



# City of New York

## OFFICE OF THE COMPTROLLER

Scott M. Stringer  
COMPTROLLER



### **MANAGEMENT AUDIT**

**Marjorie Landa**

Deputy Comptroller for Audit

Audit Report on the Staten Island Mental Health Society's Screening of Personnel through the Statewide Central Register of Child Abuse and Maltreatment

ME17-122A

**May 14, 2018**

<http://comptroller.nyc.gov>



THE CITY OF NEW YORK  
OFFICE OF THE COMPTROLLER  
SCOTT M. STRINGER

May 14, 2018

To the Residents of the City of New York:

My office has audited the Staten Island Mental Health Society (SIMHS) child care center located at 16 Osgood Avenue in Staten Island to determine whether its personnel have been properly screened through the Statewide Central Register of Child Abuse and Maltreatment (SCR). We conduct audits such as this to determine whether New York City contractors are complying with relevant statutes and regulations.

This audit reviewed the SCR-clearance status of 35 individuals who were working at the SIMHS child care center as of February 2, 2017, the date of the auditors' unannounced visit to the center, and found that for nine employees, SIMHS had obtained the most recently required SCR renewal clearances late by periods that ranged from four days to more than two years and four months (866 days). In addition, for three individuals, SIMHS had not obtained the most recently required SCR renewal clearances at all. As of the date of the visit, the three clearances were overdue by 19 days, 363 days, and 482 days (more than one year and three months), respectively. SIMHS subsequently obtained the required SCR renewal clearances for the three individuals about a year after the visit. For two employees whose SCR clearances were current as of the date of the visit, the auditors were unable to determine whether SIMHS had obtained them in a timely manner, because their personnel files did not contain evidence of the dates of their previous SCR clearances.

The audit also found other areas of concern, specifically that SIMHS did not: (1) ensure that it provides the correct current work address information to the SCR for all of its personnel; (2) prepare and maintain at each child care center location copies of appointment letters that establish the start dates for all of the new personnel at the location; and (3) obtain from the New York City Department for the Aging appointment documentation that establishes the start dates for any "foster grandparent volunteers" providing services at its child care centers.

Based on the findings, the audit made a total of four recommendations to SIMHS, including that it ensure that all of its personnel receive renewal SCR clearances within two years of their prior clearances, as required by the New York City Health Code.

The results of the audit have been discussed with SIMHS officials, and their comments have been considered in preparing this report. Their complete written response is attached to this report. If you have any questions concerning this report, please e-mail my Audit Bureau at [audit@comptroller.nyc.gov](mailto:audit@comptroller.nyc.gov).

Sincerely,

A handwritten signature in blue ink that reads "Scott M. Stringer".

Scott M. Stringer

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# THE CITY OF NEW YORK OFFICE OF THE COMPTROLLER MANAGEMENT AUDIT

## Audit Report on the Staten Island Mental Health Society's Screening of Personnel through the Statewide Central Register of Child Abuse and Maltreatment

ME17-122A

### EXECUTIVE SUMMARY

This audit determined whether personnel working at the Staten Island Mental Health Society (SIMHS) child care center located at 16 Osgood Avenue in Staten Island (16 Osgood) had been properly screened through the Statewide Central Register of Child Abuse and Maltreatment (SCR). New York City Health Code §47.19 requires that all child care center employees and volunteers undergo an SCR clearance review prior to being appointed and every two years thereafter (renewal clearances).

Child care centers provide essential services for many families, including education, recreation, and a safe and structured environment for children while their parents work. SIMHS operates an *EarlyLearn NYC* child care center for three to four year-old children at 16 Osgood (and at three other locations) under a contract with the New York City (City) Administration for Children's Services (ACS).

At a different location in Staten Island, SIMHS operates the Elizabeth W. Pouch Center for Special People (Pouch) program, which provides various educational and therapeutic support services to children with special needs. Pouch program services are also provided in two classrooms at 16 Osgood in collaboration with the *EarlyLearn NYC* program. In those two *EarlyLearn NYC* classrooms, special needs children are integrated with their mainstream peers. Finally, SIMHS maintains its headquarters elsewhere in Staten Island, where its human resources unit for all SIMHS personnel is located and the hiring of employees for the Pouch program is conducted. This audit focuses on the screening of personnel who work at the SIMHS location at 16 Osgood, including *EarlyLearn NYC* and Pouch program employees and volunteers.

### Audit Findings and Conclusions

We reviewed the SCR-clearance status of 35 individuals who were working at the SIMHS child care center at 16 Osgood as of February 2, 2017, the date of our unannounced visit to the center.

We found that for nine employees, SIMHS had obtained the most recently required SCR renewal clearances late by periods that ranged from four days to more than two years and four months (866 days). In addition, for three individuals (one employee and two volunteers), SIMHS had not obtained the most recently required SCR renewal clearances at all. As of the date of our visit, the three clearances were overdue by 19 days, 363 days, and 482 days (more than one year and three months), respectively. SIMHS subsequently obtained the required SCR renewal clearances for the three individuals about a year after our visit. For two employees whose SCR clearances were current as of our February 2, 2017 visit, we were unable to determine whether SIMHS had obtained them in a timely manner, because their personnel files did not contain evidence of the dates of their previous SCR clearances.

We also found other areas of concern, specifically that SIMHS did not: (1) ensure that it provides the correct current work address information to the SCR for all of its personnel; (2) prepare and maintain at each child care center location copies of appointment letters that establish the start dates for all of the new personnel (*EarlyLearn NYC* and Pouch program employees) at the location; and (3) obtain from the City Department for the Aging (DFTA), appointment documentation that establishes the start dates for any “foster grandparent volunteers” providing services at its child care centers.

## **Audit Recommendations**

To address these issues, the report makes a total of four recommendations, including that SIMHS ensure that all of its personnel receive renewal SCR clearances within two years of their prior clearances, as required by the New York City Health Code, and that it maintain copies of appointment letters for its new personnel.

## **Agency Response**

In its written response, SIMHS agreed with the audit’s four recommendations and stated that it has already begun to implement them. SIMHS also stated that it has developed a new tracking system to ensure that SCR clearances are renewed within two years of the prior clearance. The full text of SIMHS’s response is included as an addendum to this report.

# AUDIT REPORT

## Background

ACS is responsible for protecting the safety and promoting the well-being of children and their families. To meet these responsibilities, ACS investigates reports of child abuse and neglect, oversees foster care services, and coordinates affordable child care services at centers throughout the City. Child care centers provide essential services for many City families, including education, recreation, and a safe and structured environment for children while their parents work.

ACS coordinates affordable child care services for families who meet income-eligibility requirements by (1) issuing child care vouchers that families can use to obtain child care services from privately-run child care programs and eligible individuals; and (2) making seats available in *EarlyLearn NYC*, a program where ACS contracts with privately-operated child care centers and programs that enroll children for ACS-subsidized child care and early-education services. SIMHS operates an *EarlyLearn NYC* child care center for three to four year-old children at 16 Osgood under a contract with ACS.

City child care programs, including child care centers under contract with ACS, are licensed by the City Department of Health and Mental Hygiene (DOHMH). These programs must comply with City statutes and regulations that require specific screening procedures for current and prospective personnel, both paid and unpaid.<sup>1</sup> Under New York City Administrative Code §21-119, individuals who work or volunteer for entities that provide child care services under contract with the City must be fingerprinted and screened for criminal convictions and pending criminal actions. New York City Health Code §47.19 applies that requirement to all child care programs that need a permit from DOHMH, regardless of whether they have City contracts. In accordance with an Intra-City Agreement signed by DOHMH, ACS and the City Department of Investigation (DOI), a City-contracted child care center must send prospective personnel to DOI for such screening. The child care center must also determine whether prospective personnel have the training, education, and experience needed for specific jobs at the center.

In addition, all child care programs that are subject to licensing and oversight by DOHMH must submit clearance requests to the SCR for all prospective personnel, including volunteers, who may have unsupervised contact with children. The SCR determines whether any prospective child care center employees have been the subjects of indicated child abuse or maltreatment reports.<sup>2</sup> These clearance requests may be submitted by the center and answered by the SCR either electronically, through a web-based application, or by mail. New York City Health Code §47.19 requires that all child care center employees and volunteers undergo an SCR clearance review prior to being appointed and every two years thereafter.

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<sup>1</sup> Article 47 of the New York City Health Code applies to a "child care program," defined as "any program providing child care for five (5) or more hours per week, for more than 30 days in a 12-month period, to three (3) or more children under six (6) years of age." Title 24 of the Rules of the City of New York (RCNY), section 47.01(c)(1). Each such program requires a permit from DOHMH. 24 RCNY 47.03.

<sup>2</sup> A report is determined to be "indicated" if the investigation resulting from the report concludes that credible evidence of the alleged abuse or neglect exists.

While we were conducting an audit of ACS' monitoring of its contracted child care centers' screening of personnel, the New York State Office of Children and Family Services (OCFS), which is responsible for the operation of the SCR, determined that ACS is not allowed by New York Social Services Law §422(4)(A) to receive or review SCR clearances for child care personnel. That determination was made notwithstanding ACS' central role in contracting with the child care centers for the provision of services to thousands of children. Consequently, ACS can no longer effectively monitor its child care contractors' compliance with SCR clearance requirements.

We have continued our audit of ACS' monitoring of contracted child care centers' screening of personnel in relation to non-SCR clearance requirements, including DOI-clearance and applicable training, education, and experience standards. In addition, given ACS' now-diminished role and inability to review the SCR clearances of child care center personnel, we have chosen a sample of child care centers that provided *EarlyLearn NYC* services—including the SIMHS location at 16 Osgood—to determine their compliance with the SCR-clearance requirements.

Since 1895, SIMHS has been providing a variety of services to children, adolescents, adults with special needs, and to families of these individuals in the neighborhoods of Staten Island. SIMHS operates an *EarlyLearn NYC* program at four locations in Staten Island, including the 16 Osgood location, which is the focus of this audit. At a different location in Staten Island, SIMHS operates the Pouch program, which provides various educational and therapeutic support services to children with special needs. Pouch program services are also provided in two classrooms at 16 Osgood in collaboration with the *EarlyLearn NYC* program. In these two *EarlyLearn NYC* classrooms, special needs children are integrated with their mainstream peers. Finally, SIMHS maintains its headquarters elsewhere in Staten Island at which its human resources unit for all SIMHS personnel is located and the hiring of employees for the Pouch program is conducted.

On February 2, 2017, the date of our unannounced visit, there were 35 individuals who worked at the SIMHS child care center at 16 Osgood. These individuals included 23 *EarlyLearn NYC* employees, 10 Pouch program employees, and two volunteers. As of the date of our visit, this child care center location had a total capacity to serve 105 children in its six *EarlyLearn NYC* classrooms.

## Objective

To determine whether personnel working at the SIMHS location at 16 Osgood Avenue in Staten Island had been properly screened through the SCR.

## Scope and Methodology Statement

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objective. This audit was conducted in accordance with the audit responsibilities of the City Comptroller as set forth in Chapter 5, §93, of the City Charter.

The scope of this audit covered all of the SIMHS *EarlyLearn NYC* and Pouch program personnel who were employed by or volunteering at the 16 Osgood Avenue location in Staten Island on

February 2, 2017, the date of our unannounced visit to the center, and who had the potential of unsupervised contact with children at the center.<sup>3</sup>

During our unannounced visit, we checked the identifications of all of the personnel we observed working at the child care center on that day. For those individuals, plus any employed by the center who were not working on the day of our visit, we reviewed their personnel files to determine whether they had received the necessary initial and renewal SCR clearances. This audit did not endeavor to determine the cause of any failure to properly screen personnel through the SCR.

## Discussion of Audit Results with SIMHS

The matters covered in this report were discussed with SIMHS officials during and at the conclusion of this audit. A preliminary draft report was sent to SIMHS on March 19, 2018, and was discussed at an exit conference held on March 28, 2018. On April 23, 2018, we submitted a draft report to SIMHS with a request for comments. On May 4, 2018, we received a written response from SIMHS.

In its response, SIMHS agreed with the audit's four recommendations and stated that it has already begun to implement them. SIMHS also stated that it has developed a new tracking system to ensure that SCR clearances are renewed within two years of the prior clearance. The full text of SIMHS's response is included as an addendum to this report.

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<sup>3</sup> We primarily used an ACS dataset provided to us on October 21, 2016 to select our sample of child care centers that provided *EarlyLearn NYC* services. SIMHS, the focus of this audit, was selected as a result of our decision to include at least one Staten Island center in our series of seven SCR clearance audits. This particular Staten Island contractor was selected because it had the highest number of *EarlyLearn NYC* locations (three) in the borough during Fiscal Year 2016. The reason for choosing the 16 Osgood Avenue location was that it had the highest number of personnel of the three locations.



## FINDINGS

We reviewed the SCR-clearance status of 35 individuals (23 *EarlyLearn NYC* employees, 10 Pouch program employees, and two volunteers) who were working at the SIMHS child care center at 16 Osgood as of February 2, 2017, the date of our unannounced visit to the center. We found the following:

- SIMHS had obtained the most recently required SCR clearances on time for 21 employees.
- For nine employees, SIMHS had obtained the most recently required SCR renewal clearances late by periods that ranged from four days to more than two years and four months (866 days).
- For three individuals (one employee and two volunteers), SIMHS had not obtained the most recently required SCR renewal clearances at all. As of the date of our February 2, 2017 visit, the three clearances were overdue by 19 days, 363 days, and 482 days (more than one year and three months), respectively. SIMHS subsequently obtained the required SCR renewal clearances for the three individuals about a year after our visit.
- For two employees whose SCR clearances were current as of our February 2, 2017 visit, we were unable to determine whether SIMHS had obtained them in a timely manner, because their personnel files did not contain evidence of the dates of their previous SCR clearances.

The breakdown is shown in Table I below.

**Table I**Timeliness of Most Recently Required SCR Clearances for SIMHS Personnel

<b>Personnel Type</b>	<b>Category</b>	<b>Number of Individuals</b>	<b>Initial or Renewal SCR Clearance Obtained Timely</b>	<b>Renewal SCR Clearance Obtained Late</b>	<b>No SCR Renewal Clearance</b>	<b>Unable to Determine Whether Most Recent SCR Clearance Was Obtained Timely</b>
Employees	Recently hired (within previous two years)	5	4	---	1	---
	Worked at center two or more years	24	15	8	---	1
	Cannot determine when individuals began working at center (no appointment letters present in personnel files)	4	2*	1	---	1
Total # of Employees		33				
Volunteers	Volunteered at center two or more years	1	---	---	1	---
	Cannot determine when individual began volunteering at center (no appointment letter present in personnel file)	1	---	---	1	---
Total # of Volunteers		2				
<b>Totals</b>		<b>35</b>	<b>21</b>	<b>9</b>	<b>3</b>	<b>2</b>

\* For these two employees, the most recently required SCR clearance was a renewal clearance, which was obtained within two years of the previous clearance.

*SIMHS Obtained Required SCR Renewal Clearances Late for Nine Employees*

Of the 24 SIMHS employees who we were able to determine had worked two or more years at 16 Osgood as of our February 2, 2017 visit, SIMHS obtained the required SCR renewal clearances late for 8 employees by periods ranging from 4 days to more than two years and four months (866

days). Of the four employees whose start dates were indeterminate, the renewal clearance for one employee was late by almost six months (178 days). The nine SCR renewal clearances combined were, on average, 193 days late.

SIMHS officials stated that going forward they will ensure that “all employees and volunteers who are assigned to a specific location complete a[n] SCR renewal application form at least 60 days prior to expiration.” They further stated that a “staff document tracking form will be implemented at each location and audited monthly for compliance.”

#### *Three of the 35 Personnel Files Lacked Current SCR Renewal Clearances*

The personnel files for three individuals (one employee and two volunteers) lacked current SCR renewal clearances as of the date of our visit. The SCR renewal clearance for one employee was 19 days overdue, for one volunteer was almost one year (363 days) overdue, and for the other volunteer was more than one year and three months (482 days) overdue. The most recently required SCR renewal clearances for those three individuals were eventually obtained by SIMHS about a year after our visit. SIMHS officials stated that going forward every staff member and volunteer “must have an SCR clearance updated [every two years] with no exceptions to ensure compliance.” They further added that “volunteers will be included in the site tracking document.”

#### *SIMHS’s Records Did Not Show Whether the SCR Clearances for 2 of the 35 Individuals Were Obtained on Time*

For two employees (one who we were able to determine had worked two or more years at 16 Osgood as of the date of our visit, and one whose start date at 16 Osgood could not be determined from SIMHS’s records), we were unable to determine whether their most recent SCR clearances were obtained by SIMHS in a timely manner. Specifically, each of the personnel files for these two employees contained only one SCR clearance, one dated April 6, 2016 and the other April 7, 2016. Each clearance was still valid as of our February 2, 2017 visit. However, because SIMHS’s personnel files for the two employees contained no previous SCR clearances, we were unable to determine whether their April 2016 SCR clearances were obtained within two years of their previous SCR clearances, as required.

To protect the safety and well-being of the children receiving services at the SIMHS child care center, it is essential that all individuals who work there be properly screened through the SCR, both prior to appointment and periodically (every two years) thereafter.

#### *Related Matters*

During our audit, we noted that the child care center address on all of the most recent SCR clearance letters found for the 35 individuals working at 16 Osgood was that of the SIMHS headquarters located at 669 Castleton Avenue in Staten Island. SIMHS’s Director & Vice President of Early Childhood Services explained that the SCR clearance letters were addressed to 669 Castleton Avenue because that is the location of SIMHS’s human resources unit for all personnel (including the personnel for the *EarlyLearn NYC* and Pouch programs). However, the address indicated on a clearance letter should be for a particular child care center when an employee or volunteer is primarily assigned to work at that site. It is more appropriate for the address indicated on a clearance letter to be that of the headquarters location at 669 Castleton Avenue for an employee or volunteer whose job functions require work at multiple sites (e.g., substitute teachers, substitute custodians, or directors who oversee multiple centers). To ensure

that any allegations that are received by the SCR for employees or volunteers are sent directly to their work locations, SIMHS should provide the correct work address information to the SCR for all of its personnel.

In addition, we were initially unable to determine the dates of hire or effective start dates for 8 of the 33 employees who were working at the 16 Osgood center on the day of our visit. No appointment letters showing the individuals' employment start dates were in the personnel files for the eight employees. For one of the eight employees, a document in the file indicated that the individual was hired to work at 16 Osgood on August 30, 1999 but was subsequently terminated two years later on August 31, 2001. No other document in the file indicated when the employee was rehired. For the remaining seven employees, the dates of hire were not recorded on any of the documents in the personnel files.

During our visit to the SIMHS child care center, when we informed SIMHS that the personnel files for eight employees did not contain appointment letters, an SIMHS official explained that because the individuals in question were Pouch program employees, their appointment letters would be maintained at SIMHS headquarters at 669 Castleton Avenue rather than at 16 Osgood. SIMHS subsequently provided letters for six of the eight Pouch program employees, but two of those six letters did not specify the employees' start dates. (One was a conditional letter of appointment indicating that one employee's teaching position would begin "contingent upon receipt of all required clearances." SIMHS was unable to provide the appointment letter showing the date the employee was appointed or began working for the organization. The other letter indicated that the second employee was offered a three-month "temporary, part-time position," effective April 27, 2009 through August 11, 2009. No other document was provided by SIMHS to show when the employee was appointed to work in a permanent position.) SIMHS was unable to provide appointment letters for the two remaining employees.

SIMHS officials acknowledged that they did not always maintain appointment letters but stated that moving forward all Pouch program employees would have appointment letters indicating their effective dates of hire, which would be maintained in the personnel files at the specific locations where they are assigned to work.

We also were unable to determine the appointment date for one of the two "foster grandparent volunteers" working at the center on the date of our visit. DFTA is responsible for overseeing the Foster Grandparent Program and for evaluating and selecting volunteers to serve at designated child care centers to provide one-on-one assistance for select children. Once a volunteer has been selected, DFTA sends a welcoming letter to the designated center informing it of the volunteer's effective start date. No such DFTA letter was in the personnel file for the volunteer in question. SIMHS officials stated that moving forward they would maintain files for all "foster grandparent volunteers" working at SIMHS's child care centers, which would include "all background clearances plus an appointment letter from [DFTA] which includes the effective start date of the potential volunteer."

Appointment letters for employees and volunteers are important because, without such documentation clearly stating a date of hire, it is difficult for management or an independent reviewer, such as a DOHMH licensing inspector, to determine whether an employee's or volunteer's start date preceded the SCR clearance date.

## RECOMMENDATIONS

1. SIMHS should ensure that all of its personnel (employees and volunteers) receive renewal SCR clearances within two years of their prior clearances.

**SIMHS Response:** “SIMHS Head Start will ensure that all of its personnel (employees and volunteers) receive SCR clearances within two years of their prior clearance through the use of a newly developed tracking system.”

2. SIMHS should ensure that it provides the correct current work address information to the SCR for all of its personnel. Those employees or volunteers who are primarily assigned to one site should have the address specific to their work assignment on their SCR results. Those employees or volunteers whose job functions require work across multiple sites should have the central administrative office address on their SCR results.

**SIMHS Response:** “SIMHS Head Start will ensure that it provides the correct work address information to the SCR for all of its personnel. Since the time this audit occurred the agency has applied for and received site specific SCR accounts and all clearances are now documented in this way.”

3. SIMHS should prepare and maintain at each child care center location copies of appointment letters that establish the start dates for all of the new personnel (*EarlyLearn NYC* and Pouch program employees) at the location.

**SIMHS Response:** “SIMHS Head Start will ensure that each early childhood location has copies of appointment letters in an employee file that establishes the start dates for all new personnel assigned to that site from this time moving forward.”

4. SIMHS should obtain from DFTA appointment documentation that establishes the start dates for any “foster grandparent volunteers” providing services at its child care centers. Such documentation should be maintained at the child care center locations where the volunteers work.

**SIMHS Response:** “SIMHS Head Start will ensure that all DFTA volunteers working at our early childhood sites will have an appointment letter from the NYC Department [for] the Aging which includes the effective start date of the potential volunteer. Such documentation will be maintained at the location where the individual volunteers daily.”



## HEAD START

16 Osgood Avenue  
Staten Island, NY 10304  
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May 4, 2018

Marjorie Lander  
City of New York  
Office of the Comptroller  
Scott M. Stringer  
1 Centre St  
N.Y., N.Y. 10007-2341

Dear Ms. Landa,

I am responding to your letter dated April 23, 2018 re: the Audit Report on Staten Island Mental Health's Society Screening of Personnel through the Statewide Central Register of Child Abuse and Maltreatment ME17-122A . Attached you will find the Recommendations from your office along with this agency's comments.

If you have any question regarding this response please contact me at 718-420-6138 extension 113.

Sincerely,

A handwritten signature in cursive script that reads "Roseann Catania".

Roseann Catania  
V. P. Early Childhood Services



## HEAD START

16 Osgood Avenue  
Staten Island, NY 10304  
Phone (718) 420-6138  
Fax (718) 420-9021

### Recommendations (ME17-122A) and Comments

1. SIMHS should ensure that all of its personnel (employees and volunteers) receive renewal SCR clearances within two years of their prior clearances.

**Comments:** SIMHS Head Start will ensure that all of its personnel (employees and volunteers) receive SCR clearances within two years of their prior clearance through the use of a newly developed tracking system.

2. SIMHS should ensure that it provides the correct current work address information to the SCR for all of its personnel. Those employees or volunteers who are primarily assigned to one site should have the address specific to their work assignment on their SCR results. Those employees or volunteers whose job functions require work across multiple sites should have a central administrative office address on their SCR results.

**Comments:** SIMHS Head Start will ensure that it provides the correct work address information to the SCR for all of its personnel. Since the time this audit occurred the agency has applied for and received site specific SCR accounts and all clearances are now documented in this way.

3. SIMHS should prepare and maintain at each child care center location copies of appointment letters that establish the start dates for all of the new personnel (Early Learn NYC and Pouch Program employees) at the location.

**Comments:** SIMHS Head Start will ensure that each early childhood location has copies of appointment letters in an employee file that establishes the start dates for all new personnel assigned to that site from this time moving forward.

4. SIMHS should obtain from DFTA appointment documentation that establishes the start date for any "foster grandparent volunteers" providing services at its child care centers. Such documentation should be maintained at the child care center locations where the volunteers work.

**Comments:** SIMHS Head Start will ensure that all DFTA volunteers working at our early childhood sites will have an appointment letter from the NYC Department of the Aging which includes the effective start date of the potential volunteer. Such documentation will be maintained at the location where the individual volunteers daily.