



OFFICE OF THE AUDITOR GENERAL

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Performance Audit

Follow-Up Report

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Performance Audit of the Department of Children and Family Services Investigations of Abuse and Neglect Audit Follow-Up

The Office of the Auditor General conducted a performance audit of the Illinois Department of Children and Family Services (Department or DCFS) Investigations of Abuse and Neglect pursuant to House Resolution Number 418, of the 100th General Assembly. The audit was released in May 2019 and contained a total of 13 recommendations to the Department. The recommendations were followed up on as part of the compliance examination for the two years ended June 30, 2020. At that time, it was reported that three recommendations had been implemented, four recommendations had been partially implemented, and six recommendations had not been implemented. As part of the compliance examination for the two years ended June 30, 2022, we followed up on the status of 10 remaining recommendations and it was reported that two recommendations had been implemented, seven recommendations had been partially implemented, and one recommendation had not been implemented. As part of the compliance examination for the two years ended June 30, 2024, we followed up on the status of the remaining eight recommendations that were partially and not fully implemented. The current status of the recommendations is shown in the table below. One of the eight remaining recommendations has now been implemented while seven remain partially implemented.

STATUS OF PERFORMANCE AUDIT RECOMMENDATIONS

As of June 30, 2024

Rec. No.	Recommendation Description	Agency	Current Status		
			Implemented	Partially Implemented	Not Implemented
1	Child Abuse and Neglect Data	DCFS		X	
2	Investigator Assignments	DCFS		X	
3	Child Endangerment Risk Assessment Protocol	DCFS		X	
4	Hotline and Intake	DCFS	X		
5	Investigation Timeliness	DCFS		X	
6	Investigation Extensions	DCFS		X	
7	Assessing the Need for Services	DCFS		X	
8	Recommendations for Services	DCFS	X		
9	Intact Family Services Monitoring	DCFS	X		
10	Intact Family Services Coverage	DCFS	X		
11	Intact Family Services Referrals	DCFS	X		
12	Norman Cash Assistance	DCFS		X	
13	Community Based Services	DCFS	X		

Source: Summary of OAG follow-up.

Recommendation 1: Child Abuse and Neglect Data

The Department of Children and Family Services should continue to take steps to improve the quality of the data contained in its child abuse and neglect information systems and statistical reports. These steps should include:

- *Ensuring that proper controls are in place for SACWIS data entry, or any future child abuse and neglect information systems, in order to ensure that data is collected and is reliable; and*
- *Maintaining updated manuals including data field definitions.*

Current Status: Partially Implemented

During the current examination, according to the Department, it has taken steps to continuously improve the quality of the child abuse and neglect data in SACWIS including:

- Several SACWIS releases have made improvements to data quality; and
- Data Field definitions were assembled into a Data Dictionary.

The auditors noted the Department had improvements in data entry during FY23 and FY24. Also, the Department officials indicated it is in the process of implementing the new Comprehensive Child Welfare Information System (CCWIS) that will replace the current SACWIS to modernize child case management and data clean up. The Department has included the CCWIS Data Quality Plan in its system integrator contract for the purpose of developing a comprehensive data quality plan. However, as of June 30, 2024, the Department was in the development phase of the project.

Recommendation 2: Investigator Assignments

The Department of Children and Family Services should take steps to ensure investigator assignments are in compliance with the requirements of the B.H. Consent Decree.

Current Status: Partially Implemented

During the current examination, according to the Department, it hired 713 new investigators during FY23 and FY24. On March 12, 2021, the Department established an implementation plan to address investigator caseloads; however, this original implementation plan aiming to address investigator caseloads expired by its own terms in March 2024. On July 24, 2024, the parties in the B.H. Consent Decree filed an Extended and Revised Implementation Plan to address investigator caseloads, which the court overseeing the B.H. Consent Decree approved on that date. The extended and revised implementation plan follows the same two-phase approach used in the original implementation plan. These two phases include hiring, onboarding, and retention of child protection investigators (Phase I) and assessing whether the steps taken in Phase I have brought the Department into compliance with Paragraph 26(a) of the B.H. Consent Decree, or whether the Department must take further action to achieve compliance (Phase II).

Additionally, the auditors noted the Department submitted its annual reports in March 2023 and 2024 in relation to the original implementation plan to address investigator caseloads with the Clerk of the United States District Court for the Northern District of Illinois, Eastern Division. Based on the review of the reports, the Department has exerted efforts to comply with the requirements of the B.H. Consent decree, which includes increasing the number of case investigators, satisfaction of required meetings and reporting, as well as improving processes to effectively handle caseloads. The parties continue to meet on a monthly basis to address the Department's efforts on the strategies in the implementation plan and remain committed to achieving the goals set out in the revised and extended implementation plan.

Recommendation 3: Child Endangerment Risk Assessment Protocol

The Department of Children and Family Services should:

- *Ensure that CERAPs are completed for investigations and that they are completed in a timely manner;*
- *Ensure that CERAPs are completed and that they are completed in a timely manner when Intact Family Services are provided; and*
- *Evaluate the reliability and validity of the CERAP annually and develop written procedures related to CERAP training as is required by the Children and Family Services Act.*

Current Status: Partially Implemented

During the current examination, the auditors reviewed investigations data for FY23 and FY24 and found that 3.19 percent of initial CERAPs were not completed in a timely manner. The auditors also reviewed a sample of 25 investigations to determine if CERAPs were completed timely. The testing results indicated all the initial and final CERAPs were completed timely.

In addition, due to the nature of the changes to the current safety assessment tool, the CERAP Committee did not complete the FY23 and FY24 Annual Evaluations. The Committee asked for a pause in reporting due to the lack of data available for the new tool. The Committee plans to resume reporting in 2025, when the data becomes available. The Committee also looks forward to evaluating the new safety assessment tool.

Further, the auditors noted the CERAP training was part of the Department's Office of Learning and Professional Development training for child protection employees. Each child protection employee is required to successfully pass the CERAP examination with a minimum score of 70 percent.

Recommendation 4: Hotline and Intake

The Department of Children and Family Services should:

- *Develop formal written procedures for call backs including required timeframes for creating intakes;*
- *Ensure that the process for completing call backs is in accordance with written procedures by answering and returning hotline calls in a timely manner;*
- *Begin maintaining complete information regarding the time it takes to return the hotline calls of those reporting allegations of child abuse or neglect for an amount of time that would allow for long-term analysis; and*
- *Continue to increase the utilization of online reporting as appropriate.*

Current Status: Implemented

During the current examination, the Department had implemented procedures for call backs including employee trainings to manage call backs and creating and completing messages. The Department continued to maintain call back information in SACWIS and provided auditors with a download of call back information for FY23 and FY24. Analysis of the data provided showed significant improvements and that call backs for FY23 and FY24 dropped to 46 and 0 respectively.

The Department is also continuing to develop and use on-line reporting. According to the Department, it received 48,098 on-line reports during FY23 and 55,108 during FY24.

Recommendation 5: Investigation Timeliness

The Department of Children and Family Services should take actions to ensure that critical investigation timeframes are completed in accordance with procedures, including initiating investigations, contacting the alleged victim and perpetrator, submitting investigations for supervisory review, and completing the investigation.

Current Status: Partially Implemented

The Abused and Neglected Child Reporting Act (ANCRA) requires investigations to begin within 24 hours of receipt of the report (325 ILCS 5/7.4(b)(2)), which is defined by Department administrative rules as "the time the report was received at the State Central Register" (89 Ill. Adm. Code 300.90).

The Department's administrative rules require in-person contact with the alleged victim be made within 24 hours (89 Ill. Adm. Code 300.90).

The Department's administrative rules further require that, within seven days, there must be in-person contact with the alleged perpetrator (89 Ill. Adm. Code 300.90).

Lastly, Department policies require the Child Protection Specialist to submit the completed investigation and final determination to the Child Protection Supervisor within 55 days of receipt of the report. If a 30-day extension to complete the investigation is necessary, the Child Protection Specialist is required to submit (prior to the 55th day) an extension request to the Child Protection Supervisor who will evaluate the request (Procedures 300.50a).

During the current examination, the auditors reviewed FY23 and FY24 investigations to determine the timeliness of initiating an investigation, contacting the alleged victim and perpetrator, submitting an investigation for supervisory review, and completing the investigation. The auditors' testing results showed the following:

- 0.3 percent of all investigations had untimely initiation;

- 0.6 percent of all investigations had untimely victim contact;
- 19.4 percent of all investigations had untimely perpetrator contact;
- 38.6 percent of investigations without an extension were not submitted for supervisor review within 55 days; and
- 0.3 percent of all investigations were completed in an untimely manner.

Based on the above, the Department has established rules and procedures for timeliness requirements and made an improvement in ensuring the timeliness requirements are being met.

Recommendation 6: Investigation Extensions

The Department of Children and Family Services should comply with rules and procedures and ensure:

- *Extensions are requested prior to the 55th day of the investigation;*
- *That extensions are given only for good cause;*
- *Extensions are requested and approved by appropriate staff; and*
- *Extension requests contain all required information.*

Current Status: Partially Implemented

During the current examination, Department officials stated all requests and approvals for extensions are documented in the SACWIS. In the narrative section on the extension request, the Child Protection Specialist lists the reasons the investigation cannot be completed within 55 days, activities to be completed, who is responsible for completing each activity, and the expected date of completion. The extension requests are reviewed and approved by the Child Protection Supervisor and Area Administrator. The date and time of the Area Administrator's approval of additional extensions must be documented in a contact note.

The auditors sampled 10 FY23 and FY24 investigations that had at least one extension. The auditors' testing results noted all 10 investigations' extensions were properly approved, for a good cause, and contained all required information. However, it was also noted that for all 10 investigations, the initial extension requests were not submitted within 55 days. The testing results noted the initial extension requests were submitted 17 to 373 days after the 55-day requirement.

The auditors also reviewed the 10 investigations with the most extensions and found that:

- These 10 investigations had a total of 202 extensions at the time investigations data were received;
- None of the initial requests for an extension were submitted within 55 days; and
- All investigations were extended for a good cause and were properly approved.

Recommendation 7: Assessing the Need for Services

The Department of Children and Family Services should:

- *Make the Level of Intervention a required field in SACWIS and revise the Level of Intervention options to more accurately reflect current practices; and*
- *Include a rationale for indicated investigations in which there is a Level of Intervention of "No Service Needed."*

Current Status: Partially Implemented

During the current examination, Department officials stated the Level of Intervention is required for each investigation.

The auditors analyzed data provided by the Department regarding the Level of Intervention and found the following:

- The Level of Intervention is a required field in SACWIS, however, of 190,781 investigations completed during FY23-FY24, 15,789 (8.3%) had a blank Level of Intervention; and
- No changes have been made to the Level of Intervention options in SACWIS (Intact Family Services is not an option that can be selected and there is no rationale when "no services" are recommended).

The auditors also reviewed a sample of 25 indicated investigations and found that the rationale for the Level of Intervention was inaccurate for all (100%) investigations. Specifically, it was noted the investigations had a blank Level of Intervention.

Recommendation 12: Norman Cash Assistance

The Department of Children and Family Services should document all purchases made with Norman Cash Assistance funds. The Department should also update its cash assistance request approval policies to reflect the current organizational structure of the agency.

Current Status: Partially Implemented

During the current examination, the auditors were provided the updated procedures for the Norman Cash Assistance Program, however, the updated procedures and modifications were still pending review and final approval as of June 30, 2024. According to Department officials, the proposed changes seek to increase the amounts of Norman Cash Assistance that various positions can approve. These changes also provide more clarity on the cash assistance approval protocol and provide flexibility to assist families in a more streamlined fashion. These considerations were in review with the Office of Child and Family Policy as of the end of the auditors' fieldwork.

The Department also provided the auditors a list of 14,726 Norman Cash expenditures for FY23 and FY24. The auditors reviewed a sample of 25 Norman Cash expenditures to determine if documentation and approval of the expenditure was available. The Department provided documentation and approval forms for the 25 expenditures and the testing results indicated all expenditures were properly approved.

Follow-up was conducted as part of the Fiscal Year 2023 and 2024 State compliance examination by our special assistant auditors, Roth & Co. This was the third time follow-up has been done on the recommendations from the May 2019 performance audit.