



STATE OF NEW YORK  
OFFICE OF THE STATE COMPTROLLER

February 12, 2026

DaMia Harris-Madden, Ed.D.  
Commissioner  
Office of Children and Family Services  
52 Washington Street  
Rensselaer, NY 12144

Re: Oversight of Juvenile Justice Facilities  
Report 2025-F-15

Dear Commissioner Harris-Madden:

Pursuant to the State Comptroller's authority as set forth in Article V, Section 1 of the State Constitution and Article II, Section 8 of the State Finance Law, we have followed up on the actions taken by officials of the Office of Children and Family Services to implement the recommendations contained in our initial audit report, *Oversight of Juvenile Justice Facilities* (Report [2022-S-13](#)).

**Background, Scope, and Objective**

According to a study published in the *Journal of the American Medical Association*,<sup>1</sup> incarcerating youth in adult correctional facilities exposes them to conditions that may adversely affect psychological and physical health. In New York, youth are generally placed in a residential juvenile justice facility as an alternative. The Office of Children and Family Services' (OCFS) mission is to serve New York's public by promoting the safety, permanency, and well-being of the State's children, families, and communities. Toward this end, OCFS, through its Division of Juvenile Justice and Opportunities for Youth (DJJOY), is responsible for the operation and oversight of nine State-run residential juvenile justice facilities that serve court-placed youth. The nine facilities include three secure facilities, five limited-secure facilities, and one non-secure facility.

OCFS has the responsibility to ensure the safety of both youth and employees at its DJJOY facilities. This includes ensuring that these facilities are operated in good condition and in compliance with the DJJOY Policy and Procedure Manual, conduct regular fire safety inspections, have an emergency plan, maintain sanitary conditions, and provide health screenings upon admission. Further, OCFS must ensure that facility staff are properly trained and that, when incidents (e.g., assault, possession of contraband, self-harm, employee misconduct, restraints of youth) occur, facilities log and report them as required.

To be authorized to restrain youth at DJJOY facilities, direct care staff must, upon hire, complete a 40-hour crisis prevention and management (CPM) course that includes de-escalation skills and physical restraint techniques. Staff are also required to complete CPM

<sup>1</sup> Silver, I.A., Semenza, D.C., & Nedelec, J.L. (2023). Incarceration of youths in an adult correctional facility and risk of premature death. *JAMA Network Open*, 6(7), e2321805. doi:10.1001/jamanetworkopen.2023.21805

refresher courses annually. To be authorized to restrain youth, staff must also take an annual cardiopulmonary resuscitation (CPR) refresher training and biennial first aid training.

Between 2019 and 2022, DJJOY facilities faced a series of challenges, including the COVID-19 pandemic and phasing in of New York's Raise the Age legislation that contributed to an increase in youth placement in DJJOY facilities as well as an increased number of incidents. Also, during this period, staffing fell and, consequently, overtime increased significantly. Since the initial audit, both the number of youths placed in DJJOY facilities and the number of incidents have continued to rise. Between 2022 and 2024, the number of youth in DJJOY facilities increased by about 36%, from 398 in 2022 to 540 in 2024. The total number of incidents at DJJOY facilities increased by about 13%, from 2,469 in 2022 to 2,787 in 2024.

The objective of our initial audit, issued on April 3, 2024, was to determine whether OCFS adequately operated juvenile justice facilities for court-placed youth to ensure they met State standards and regulations for the health and safety of juveniles and staff. The audit covered the period from October 2018 through August 2023. The audit found weaknesses in several aspects of OCFS' operation of DJJOY facilities. Specifically, OCFS had not ensured that certain admission assessments and screenings, including health-related assessments, were completed and documented as required or were done within the required time frames, creating the risk of missed or delayed opportunities to identify or provide care for physical health conditions (e.g., vision or dental issues, diabetes) or mental health concerns (e.g., depression, anxiety) youth may have when admitted to DJJOY facilities. These assessments and screenings can be vital because youth entering juvenile justice programs often have a history of medical neglect. Further, OCFS did not ensure that all direct care staff were current with the training to be authorized to restrain youth. As a result, employees may not be familiar with or understand their roles in the event of an emergency. Additionally, OCFS did not always ensure the reviews of incidents were complete or thoroughly documented. We identified restraint incidents that were missing support that a complete review of the events had been conducted. OCFS officials attributed most of our findings to ongoing staffing challenges and stated they recognized the effect of those challenges on providing critical assessments, keeping staff up to date on training, and other administrative functions.

The objective of our follow-up was to assess the extent of implementation, as of October 2025, of the two recommendations included in our initial audit report.

### **Summary Conclusions and Status of Audit Recommendations**

OCFS officials have made progress in addressing the issues we identified in the initial audit. Of the initial report's two audit recommendations, both were implemented.

### **Follow-Up Observations**

#### **Recommendation 1**

*Review current administrative procedures and training curriculum and, where practicable, implement changes to enable staff to, at a minimum:*

- *Complete admission assessments and screenings on time,*
- *Meet training requirements, and*
- *Complete restraint incident review and record-keeping requirements.*

Status – Implemented

Agency Action – Since the initial audit, OCFS has reviewed its administrative procedures related to admissions and has revised two of its admission forms: the Medical and Dental Admission form and the Diet Order form. These changes were made to help ensure the timely completion of admission assessments and screenings. For example, OCFS updated the Medical and Dental Admission form to include mandatory completion of certain forms and tasks to ensure all medical needs are addressed upon admission. OCFS also updated the Diet Order form to reflect that it must be completed for all youth upon admission and submitted to kitchen staff. During our follow-up, we reviewed a judgmental sample of 10 youth case files and found that all 10 files contained complete admission assessments and screenings that were completed on time and documented as required.

During our follow-up, we reviewed samples of documentation from one facility related to incidents and staff restraint training. We did not identify any issues concerning restraint incidents and also determined that the staff sampled had completed all required training to be authorized to restrain youth.

Specifically:

- We reviewed restraint packets for a judgmental sample of 10 incidents that occurred between September 2023 and September 2025. We found that all 10 incidents were reported accurately on the restraint logs and the documentation was completed, reviewed, and filed as required.
- We reviewed restraint packets for a sample of the six most recent incidents from a facility's restraint log as of the time of our visit in September 2025 to determine whether the files contained the required forms and approvals. All six files contained the required forms and approvals.
- We reviewed the training records for a sample of 11 employees who were involved in the six most recent incidents to determine whether they had received all required training. All 11 employees' training records contained evidence of the required CPM refresher and biennial first aid training.

### **Recommendation 2**

*Determine the sufficient staffing levels necessary to adequately provide for the health and safety of juveniles and staff and increase efforts and focus resources to meet those levels.*

Status – Implemented

Agency Action – OCFS has reviewed its staffing levels and updated its policies to address staffing shortages. Officials stated that the previously established staffing ratios—one direct care staff to eight youths during waking hours and one direct care staff to 16 youths during sleeping hours—provide each facility with sufficient staffing levels. Officials said the primary challenge is with recruiting, training, and adequately preparing staff for the demands of this type of work, as well as retaining employees at the required staffing levels.

OCFS has taken steps to address these challenges through both policy changes and recruitment and retention efforts. For example, in November 2025, OCFS issued a

memo to facilities requiring Assistant Directors to work at least one evening shift and one weekend shift each week. OCFS officials believe this change provides better guidance, support, and supervision to facility staff. In addition, in May 2024, OCFS issued a new policy allowing certain required training courses to be completed virtually rather than in person. OCFS officials stated that this policy helps staff maintain compliance with their training requirements while also helping to alleviate some staffing shortages. OCFS officials also said that they plan to hire five staff mentors to assist with employee development and support staff in the facilities.

OCFS officials have also taken the following steps to fill vacancies:

- Conducting job fairs and using online advertisements and physical advertisements (e.g., flyers, posters, signs) to enhance recruitment efforts.
- Combining certain titles and changing educational requirements to create a career path for more direct care staff.
- Allowing applicants to qualify for positions based on work experience instead of formal education requirements.

Despite these efforts, DJJOY facilities continue to face significant staff shortages. According to OCFS' data available since the end of our initial audit, from October 2023 through the end of October 2025, staffing levels varied across DJJOY facilities. However, five of OCFS' nine facilities operated below the approved fill levels for at least 6 months, with two facilities operating understaffed for the entire 25-month period we reviewed. For example, one facility operated, on average, with about 111 of the 129 staff required, about 14% below the required staffing level from October 2023 through the end of October 2025. OCFS officials stated that they will continue their efforts to achieve and maintain full staffing levels.

Major contributors to this report were Raymond Barnes, Kathleen Garceau, and Frank Scaturro.

We thank the management and staff of OCFS for the courtesies and cooperation extended to our auditors during this follow-up.

Very truly yours,

Andrea LaBarge  
Audit Manager

cc: Bonnie Hahn, Office of Children and Family Services