

PROPOSAL MEMORANDUM
May 7, 2009

Subcommittee #: 1

Name: **SCR, documentation and record keeping**

General Comments/Summary:

1. Sections of the regulations that should remain:

2. Sections of the regulations where more specifics or clarification are needed:

18 NYCRR452.9(b)(5): The subcommittee recommends that OCFS clarify any appropriate limitations on the use of minors as employees or volunteers in residential or non-residential programs. For example, the subcommittee supports limitations on minors answering hotlines or engaging in direct client services. However, the subcommittee supports the use of minors with certain activities that might bring them into contact with clients, including shelter upkeep and maintenance of in-kind client donations to shelters.

3. Significant gaps in the regulation: