Pennsylvania Right-to-Know Law (RTKL) Request

To: Open Records Officer, York County / York County Children, Youth & Families (CYF)

Re: RTKL Request – Recordkeeping, Retention, Supervisory Review, QA/QI, and Complaint-Handling Policies

Request: Pursuant to the Pennsylvania Right-to-Know Law ("RTKL"), I request access to records that identify or describe the records sought with sufficient specificity. See 65 P.S. § 67.703.

Legal citation: 65 P.S. § 67.703 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-703/).

Timeframe

January 1, 2025 through February 20, 2026 (or the versions in effect during this period)

Records Requested (Policies / Procedures / Guidance / Manuals)

Please provide copies of the following policies, procedures, guidance documents, manuals, checklists, or training/QA materials that were in effect at any time during the timeframe above, including superseded versions and revision histories to the extent maintained:

1) Recordkeeping and Records Retention

• Records retention schedules applicable to CYF program records and administrative records.

• Policies governing creation, maintenance, correction, and finalization of case management system entries (including required fields and supervisory sign-off requirements, if any).

• Policies governing document version control (including use of required form versions/templates and how updates are deployed).

2) Email and Electronic Communications Retention

• Policies and retention schedules for CYF email, including retention periods, archiving procedures, and deletion policies.

• Policies governing retention of text messages or messaging platforms used for county business (if any).

3) Supervisory Review / Approval Requirements

• Policies describing when supervisory approval is required (e.g., screening decisions, jurisdiction decisions, determinations/closures, extensions), and what must be documented.

• Any supervisor review checklists or required review steps.

4) Quality Assurance / Quality Improvement (QA/QI)

• QA/QI manuals, protocols, or internal review standards used by CYF.

• Any CYF internal audit program documents, quality sampling methodologies, or corrective action tracking procedures.

5) Complaint Intake and Resolution

• Policies and procedures for receiving, logging, investigating, and resolving complaints about CYF staff, contractors, or practices.

• Templates/forms used for complaint intake, tracking, and closure.

• Any escalation or referral policies (e.g., to HR, legal, commissioners, or external oversight).

6) Conflict-of-Interest and Vendor/Oversight Policies

• Conflict-of-interest policies applicable to CYF employees and contractors.

• Policies governing oversight of outside vendors/contractors (including legal counsel), such as approval chains, review of work product, and billing review rules (if maintained as CYF policy).

Preferred Format / Database Export (If Applicable)

If any responsive policies or manuals are stored in an electronic document management system or shared drive, please provide them in the electronic format maintained (PDF preferred). This request does not ask the agency to create a record that does not exist. See 65 P.S. § 67.705.

Legal citation: 65 P.S. § 67.705 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-705/).

Redactions and Denial Requirements

If nonpublic information is intermingled with public information, the agency may not deny access if it can be redacted. See 65 P.S. § 67.706.

Legal citation: 65 P.S. § 67.706 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-706/).

For any withholding/redaction, please provide the specific reasons with supporting legal authority as required by RTKL denial rules. See 65 P.S. § 67.903(2).

Legal citation: 65 P.S. § 67.903 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-903/).

Response Time / Interim Response

Response shall not exceed five business days from receipt by the open-records officer. See 65 P.S. § 67.901.

Legal citation: 65 P.S. § 67.901 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-901/).

If an extension is invoked, please comply with RTKL Section 902 requirements. See 65 P.S. § 67.902.

Legal citation: 65 P.S. § 67.902 (https://codes.findlaw.com/pa/title-65-ps-public-officers/pa-st-sect-65-67-902/).

Thank you,

[redacted]

R000096-022326 - Right to Know Request

Message History (4)

On 3/18/2026 8:03:06 PM, York County PA Open Records Office wrote:

Subject: [Right-to-Know Records Center] R000096-022326 :: [REQUEST TYPE]:: R000096-022326
Body:

RE: Reference # R000096-022326, Right to Know Request of February 23, 2026

[redacted],

The County of York received a Right to Know Request from you on February 23, 2026. You requested the following information:

"Please see the attached request."

Based upon the information in your request, the County has performed a search and has identified documents responsive to your request. Please log in to Right-to-Know Records Center at the following link to retrieve the appropriate responsive documents.

Right to Know Request - R000096-022326

Please note that the County is providing the Records Retention (Expungement) Policy and the QA Manual/Internal Audit Policy. With regard to the Supervisory Review procedures, York County Children Youth and Families (YCCYF) follows the County's policy, which has also been provided. With regard to the Supervisory Review procedures, YCCYF follows the State regulations. Finally, YCCYF does not have an internal email retention policy or complaints policy.

You have the right to appeal the denial of any information, if applicable, in writing to Office of Open Records, 555 Walnut Street, Suite 605, Harrisburg, PA 17101-2234. Your appeal must be filed with the Office of Open Records within fifteen (15) business days of the date of this response.

Sincerely,

Jonelle Eshbach
Solicitor
Solicitor's Office

On 2/24/2026 7:39:19 PM, York County PA Open Records Office wrote:

Subject: [Right-to-Know Records Center] Right to Know Request :: R000096-022326
Body:

YORK COUNTY
PENNSYLVANIA

RE: Right to Know Request Reference # R000096-022326 created on February 23, 2026,

[redacted],

The County of York Open Records Office received a public records request from you on February 23, 2026. You requested the following:

"Please see the attached request."

Please be advised that the County of York is invoking its right to an additional thirty (30) days to respond to your Open Record Request as the extent or nature of your request precludes a response within the required five-day time period.

Thank you for your patience in awaiting this information.

Sincerely,

Jonelle Eshbach

Solicitor

Solicitor's Office

To view the full details of this request please log into the Right-to-Know Records Center

On 2/23/2026 3:34:36 PM, York County PA Open Records Office wrote:

[redacted]:

Thank you for your request to the York County Open Records Office. Your request has been received and is being processed in accordance with the Right-to-Know Law. Your request was received in this office on 2/23/2026 and given the reference number R000096-022326 for tracking purposes.

Records Requested: Please see the attached request.

Your request will be forwarded to the relevant department(s) to locate the information you seek and to determine the volume and any costs associated with satisfying your request.

You will be provided with any responsive documents after we complete our search.

PLEASE NOTE: The Right to Know Law does not require a governmental body to create new information, to do legal research, or to answer questions.

You can monitor the progress of your request at the link below and you'll receive an email when your request has been completed. Again, thank you for using the Right-to-Know Records Center.

To monitor the progress or update this request please log into the Right-to-Know Records Center

Powered by GovQA

On 2/23/2026 3:34:35 PM, [redacted] wrote:

Request Created on Public Portal

York County Office of Children, Youth & Families Policy & Procedure Manual	**Subject: Internal Case Reviews**
Policy Effective Date: 4/7/25	**Last Revised Date:** 8/27/25

Procedure for Internal Case Reviews

Purpose:

The purpose of York County Office of Children, Youth & Families policy and procedure is to set guidelines to assure ethical compliance to all agency, county, state and federal regulations guiding agency practice standards to meet the safety and well-being of our families and staff.

Policy:

This procedure is to set the standard process for the CQI Policy, Operations and Procedures (POP) team internal review of case files to assure all caseworkers are reviewed at least quarterly and all data is shared with supervisors and managers. This information is to assist in finding trends in casework practice, to prepare for the annual state licensing reviews, and to provide feedback for staff's annual performance reviews.

Procedure(s):

1. Program Specialist I (PSI) will be assigned to a specific Division Manager and will complete monthly case reviews for those teams. Each Intake Caseworker should have two referrals (one CPS and one GPS) reviewed each month. Each Ongoing Caseworker should have either one In-Home or one Placement case reviewed each month, assuring at least one of both In-Home and Placement cases are reviewed within the quarter. The Independent Living Coordinator will be assigned to the Provider teams and will review two cases per caseworker, with at least one case being a review of a youth age 14 years or older to ensure a look at independent living services being provided.
2. The ongoing cases pulled each month will be a review of the last 6 months of the case. If the currently assigned Caseworker was not the primary caseworker for the entire 6-month period, the case will be reviewed from the time the current Caseworker was assigned through present day. This will ensure that quarterly reports will accurately reflect the individual caseworker and supervisor. A Caseworker should have had the case for at least 2 months before being reviewed.
3. Referrals pulled for review, both CPS and GPS, should be recently closed (within the last 30 days) to allow for a review of the full investigation period.
4. The internal targeted licensing tools will be used in spreadsheet format for these reviews, with the current plan of correction areas being highlighted and/or added as necessary. Notes will be entered into the spreadsheet, with strengths being noted for each case. YES indicates that the citation area was completely met. NO indicates that something was missing. N/A indicates that the citation area did not apply to this

case or the review period. All NO responses should be highlighted yellow with applicable explanations entered as a note.

5. For CPS and GPS referrals in which an Emergency Duty (ED) Caseworker completed the initial investigation steps, a second column will be added for that referral to provide a look at the work completed by the ED Caseworker. This will ensure that any citation areas from the initial assessment are not attributed to the assigned Caseworker's data. In these instances, the citation area for the Caseworker will be marked N/A and the area for the ED Caseworker will be marked YES or NO.
6. The PSI will forward each manager's monthly spreadsheet to the CQI Clerk Typist (CT)3 by the last working day of the month. The CT 3 will combine the monthly data charts to produce a monthly report for each Caseworker/Supervisor. No later than the Monday prior to the weekly review, the CT3 will forward the reports to the Manager & Supervisors, including the PSI, CQI PSII, CQI Division Manager and Assistant Administrator. This report will be reviewed by the PSI during monthly meetings with the Supervisor, Manager, Assistant Administrator and CQI Division Manager to identify trends specific to each caseworker, supervisor and manager to address performance trends and process improvements.
7. Clerk Typist 3 will also create quarterly reports specific to each Caseworker, Supervisor and Manager, as well as an overall report encompassing the entire agency. The CT3 will forward these reports to the PSI, CQI PSII, CQI Division Manager, CW Supervisor, Direct Service Manager and Assistant Administrator by the 25th of the month following the end of the quarter. These reports will be reviewed briefly by the PSI during the next monthly meeting to allow for questions.
8. Internal case reviews will be conducted for 2 quarters of the year: Quarter 1 will be April, May and June. Quarter 2 will be July, August and September. The individual Caseworker's quarterly reports will then be reviewed for the top areas of concern. For Quarter 3, October, November and December, the case reviews will look only at the areas of concern. This will allow for a more succinct look at improvements made in those areas of concern. No cases will be reviewed in Quarter 4, January, February and March due to the Agency's annual licensing review being held in February.

PSI Manager Assignments

Program Specialist	Division Manager
Shelby Schaeffer	Jennah Kosmicki
Amie Gladfelter	Pat Neiderer
Nicole Fourhman	Provider Case Management Teams/Ashley Fourhman
Andrea Walling	Amanda Wilt

YORK COUNTY, PA.	POLICY MANUAL
POLICY NUMBER: GI - 3.0	EFFECTIVE DATE: July 1, 2004
SUBJECT: Conduct, Ethics and Conflict of Interest	PREPARED BY: Policy Committee
APPROVED BY COMMISSIONERS: April 14, 2004	

This policy applies to all departments and employees except if superseded by bargaining unit agreement or court-appointed policy.

I. PURPOSE

The purpose of this policy is to establish the County of York's expectations for the highest standards of personal and professional conduct by all employees, while abiding by all applicable legislation governing the ethical conduct of public officials and employees. This policy outlines basic guidelines for ethical behavior and is not to be construed as a detailed set of rules to govern every situation.

II. POLICY

It is the policy of the County of York that all employees are to maintain the highest standards of personal and professional conduct and to abide by all applicable legislation governing the ethical conduct of public officials and employees. Employees are expected to use good judgment, to adhere to high ethical standards and to avoid situations that create an actual or apparent conflict between their personal interests and those of the County. The County of York further requires that the transactions employees participate in are ethical and within the law, both in letter and in spirit.

III. DEFINITIONS

A. ***Conduct*** - behavior or actions

B. ***Conflict of Interest*** - a clash between the public obligations and personal interests of an employee; a circumstance that would cast doubt on an employee's ability to act with total objectivity with regard to the County of York's interest

C. ***Ethics*** - a system of right or good behavior

D. ***Ethical Conduct*** - conforming to accepted principles of right and wrong

IV. PROCEDURE

A. Conflict of Interest

1. Each employee is expected to avoid any action or involvement that would in any way compromise or appear to compromise his/her actions on behalf of the County of York.

2. Conflict of interest or unethical behavior may take many forms including, but not limited to, the acceptance of gifts from vendors, potential vendors or customers.
3. Employees are cautioned to examine carefully all relationships with vendors, potential vendors or customers.

B. Outside Employment

1. Employees may engage in outside business activities, provided such activities do not adversely affect the County's operations or the employee's job performance.
2. An employee may not conduct third party business during compensable County time.
3. An employee's outside employment may not present an actual or perceived conflict of interest.
4. Employees participating in outside or third party employment are not permitted to use County supplies, equipment, utilities or wear official County uniforms in the completion of said employment.
5. Employees may consult with Human Resources if they have any questions concerning outside employment activities.

C. Legal or Ethical Concerns

1. Employees are encouraged to seek assistance from their Elected Official, Executive Director or Director with any legal or ethical concerns regarding County activities.
2. Employees may also contact Human Resources to report or discuss any legal or ethical concerns regarding County activities.

RELATED COUNTY POLICIES:	Political Activity - Code of Conduct Confidentiality
RELATED FORMS:	None
ORIGINAL DATE ESTABLISHED:	April 2004
REVISION DATES:	None

York County Office of Children, Youth & Families Policy & Procedure Manual	**Subject: Expungements**
Policy Effective Date: 1/24/2024	**Last Revised Date: 8/13/2024**

Policy for Expungements

Purpose:

The purpose of York County Office of Children, Youth & Families policy and procedure is to set guidelines to assure ethical compliance to all agency, county, state and federal regulations guiding agency practice standards to meet the safety and well-being of our families and staff.

Policy:

Per Pennsylvania Child Protective Services Law (PA CPSL) the below chart provides a basic overview of the expungement timeline. The state determines the expungement dates based on the outcomes that the county submits to the state via CAPS. Once the state provides the monthly expungement list to the county, the county has 120 days to complete the expungements in CAPS and all county records storage system. The county cannot complete an expungement until being notified by the state.

Screen Outs and Supplementals	Expunged after 1 year of the referral received date
CPS – Unfounded not accepted for services	Expunged after 1 year of the referral received date
CPS – Unfounded accepted for services	Expunged at 1 year after closure or when subject child is 23 years of age; whichever is first
CPS – Founded	Expunged at youngest victim DOB + 23 years
GPS – Invalid	Expunged at the state (CWIS) 1 year after referral received date. County can maintain for 5 years after referral received date; **this information can only be used for the county CYF purposes only.**
GPS – Valid not accepted for services	Expunged at 10 years after closure or youngest child is 23 years of age
GPS – Valid accepted for services	Expunged at 10 years after closure or youngest child is 23 years of age

Procedure(s):

1. Monthly, the Continuous Quality Improvement (CQI) Clerk Typist 3 (CT3) will pull the state expungement list from Docushare. The list is also sent from the State to the Agency Administrator and given to the CQI CT3.
2. The CQI CT3 will review the list and update the internal tracking spreadsheet.
3. The CQI CT3 will assure that there are no reasons, such as pending litigation, to maintain case files that are due to be expunged.

4. The CQI CT3 will expunge all appropriate cases from the internal case systems, to include CAPS, Laserfiche, S drive and any other potential systems. Specific expungement procedures can be found in the CQI Division folder/Procedure Guides.

Cross Reference:

§ 6337. Disposition and expunction of unfounded reports and general protective services reports.

(a) General rule.--When a report of suspected child abuse is determined by the appropriate county agency to be an unfounded report, the information concerning that report of suspected child abuse shall be maintained for a period of one year. Following the expiration of one year after the date the report was received by the department, the report shall be expunged from the Statewide database, as soon as possible, but no later than 120 days after the one-year period following the date the report was received by the department, and no information other than that authorized by subsection (b), which shall not include any identifying information on any subject of the report, shall be retained by the department. The expunction shall be mandated and guaranteed by the department.

(b) Absence of other determination.--If an investigation of a report of suspected child abuse conducted by the appropriate county agency pursuant to this chapter does not determine within 60 days of the date of the initial report of the instance of suspected child abuse that the report is a founded report, an indicated report or an unfounded report, or unless within that same 60-day period court action has been initiated and is responsible for the delay, the report shall be considered to be an unfounded report, and all information identifying the subjects of the report shall be expunged no later than 120 days following the expiration of one year after the date the report was received by the department. The agency shall advise the department that court action or an arrest has been initiated so that the Statewide database is kept current regarding the status of all legal proceedings and expunction is delayed.

(c) Unfounded reports accepted for services.--Information on an unfounded report shall be retained in the Statewide database if the county agency has accepted the family for services and the report of suspected child abuse is clearly identified as an unfounded report. The county agency shall notify the department immediately upon closure of the case, and the report shall be expunged as soon as possible, but no later than 120 days after the one-year period following the date the family case was closed. If the subject child of the unfounded report becomes 23 years of age prior to the closure of the family case, the unfounded report shall be expunged when the subject child reaches 23 years of age.

(d) Expunction of valid general protective services reports.-- Information concerning valid general protective services reports shall be maintained in the Statewide database as follows:

(1) Reports that are assessed by the county agency and are determined to be valid, but are not accepted for services, shall be reported to the department and entered into the Statewide database. The reports shall be maintained for a period of ten years or until the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first. Following the expiration of ten years after the date the report was received by the department or until the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first, the report shall be expunged from the Statewide database as soon as possible, but no later than 120 days after the ten-year period following the date the report was received by the department or the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first.

(2) Reports that are assessed by the county agency and accepted for services shall be reported to the department, except as otherwise provided in subsection (f)(2), and entered into the Statewide database. The reports shall be maintained for a period of ten years after the closure of services by the county agency or until the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first. Following the expiration of ten years after the closure of services by the county agency or until the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first, the report shall be expunged from the Statewide database as soon as possible, but no later than 120 days after the ten-year period following the closure of services by the county agency or the youngest child identified in the most recent general protective services report attains 23 years of age, whichever occurs first.

(3) The expunction of information on general protective services under this subsection shall be mandated and guaranteed by the department.

(e) Expunction of invalid general protective services **reports.--**When a report alleging the need for general protective services is determined by the appropriate county agency to be an invalid report, the information concerning that report shall be maintained for a period of one year. Following the expiration of one year after the date the report was received by the department, the report shall be expunged as soon as possible, but no later than 120 days after the one-year period following the date the report was received by the department. The expunction shall be mandated and guaranteed by the department.

(f) County agency records.--Information concerning protective services reports shall be maintained by a county agency as follows:

(1) County agency records of protective services shall be used and maintained in a manner that is consistent with the use and maintenance of information in the Statewide database, as provided under this chapter, except as otherwise provided in paragraph (2). If required under this chapter to amend or expunge information in the Statewide database, the department shall notify the appropriate county agency of the amendment or expungement within ten days. The county agency shall amend or expunge its records in a commensurate manner within ten days of receiving notification from the department.

(2) A county agency may maintain information regarding protective services reports that have been expunged in the Statewide database for access by the county agency to assist in future risk and safety assessments and research.