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Child Welfare
What's on the Horizon?

Colorado Counties, Inc.
Annual Winter Conference
December 2, 2014

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Department of Human Services

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Child Welfare Hotline System Unit Manager

COLORADO
Department of Human Services

State Child Abuse and Neglect Hotline

An introduction to the new state-wide hotline for reporting child abuse and neglect

Agenda

- How Did We Get Here?
- Few Interesting Facts
- Design
- The Task
- Future Options

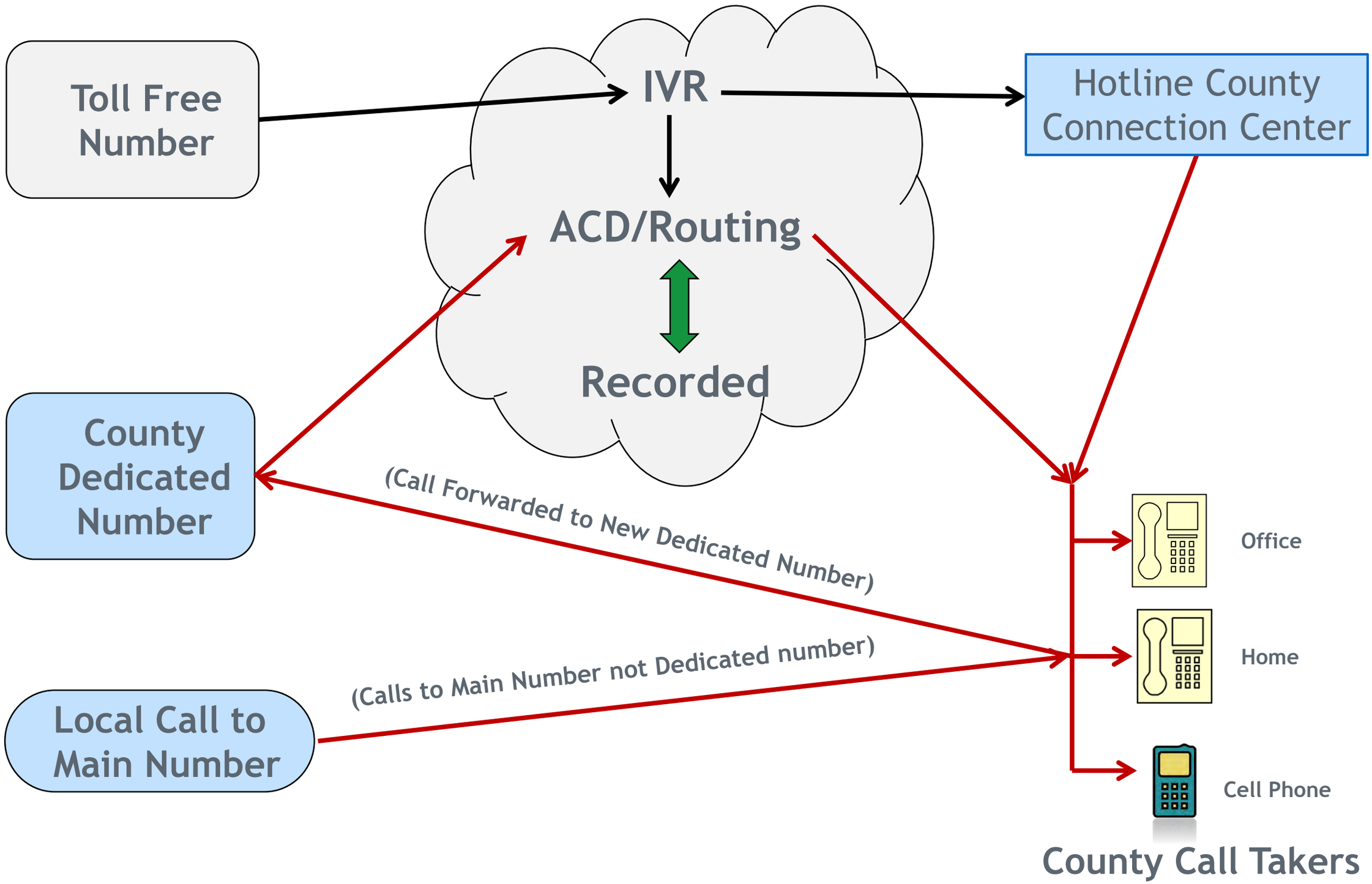
How Did We Get Here?

- 2012 Governor announces child welfare plan "Keeping Kids Safe & Families Healthy"
- 2013 - HB13-1271 & HSC Recommendations
- Ease of Public Access Toll Free #
- Recording all Calls
- Collecting Call Data
- "Live Answer"
- No Unfunded Mandates
- Training & Rules
- Awareness Campaign

Few Interesting Facts

- 147,000 calls annually
- Expect 20% Increase
- 80% Mandatory Reporters
- 21 Counties = 95% Calls/Referrals
- 17 Counties Dedicated Numbers

Design


Toll Free Number
IVR
ACD/Routing
Recorded
Hotline County Connection Center
County Dedicated Number
(Call Forwarded to New Dedicated Number)
(Calls to Main Number not Dedicated number)
Local Call to Main Number
Office
Home
Cell Phone
County Call Takers

The Task

- 64 Customized County Designs
- Compatibility Program
  - Network & Systems
- Testing & Roll-Out
- Awareness Campaign

Future Options

Answering Service

- After Hours, Weekends, Holidays, Overflow
- Live Transfer*
- Requires request by Director and agreement by CDHS

Information Gathering

- Full Screening
- Warm Transfer to County for all Decisions
- Requires request by BOCC and agreement by CDHS

Emergency Back-up

- Natural Disasters
- Outages

Colorado Child Abuse and Neglect Public Awareness Campaign

The two primary objectives of this campaign are to:

1. Increase awareness of the state's new child abuse and neglect hotline.

2. Educate mandatory reporters and the general public on how to identify and report suspected child abuse and neglect.

Colorado Child Abuse and Neglect Public Awareness Campaign

- MESSAGE DEVELOPMENT
- GRAPHIC DESIGN
- PAID MEDIA
- COMMUNITY OUTREACH
- CULTURALLY INCLUSIVE MARKETING
- PUBLIC RELATIONS
- MARKETING MATERIALS
- APRIL CHILD ABUSE PREVENTION MONTH
- PUBLIC SERVICE ANNOUNCEMENTS
- SOCIAL MEDIA
- SPECIAL EVENTS
- REPORTING AND EVALUATION

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Julie Krow

Director
Office of Children, Youth & Families

COLORADO
Department of Human Services

Office of the State Auditor County Child Welfare Workload Study

August 2014

County Child Welfare Workload Study

The workload study provides a picture of the State's county child welfare workload, case management, and staffing levels and identified estimated workload and staffing levels to accomplish child welfare goals.

Forty-nine (49) county departments participated in the study. These counties reported that they employed more than 1,800 child welfare staff or an average of 40.7 child welfare workers per county.

County Child Welfare Workload Study Recommendations

The study recommended an estimated 574 additional caseworker FTE positions, plus 122 related supervisory positions, are needed to handle caseloads.

The study also recommended improving operational efficiencies in the child welfare process to help provide more staff time and resources to counties for delivering services from current resources.

Governor's FY 2015-16 Budget

On November 3rd, the Governor delivered his budget request to the Joint Budget Committee.

$86.4 million in new funding for CDHS programs and initiatives.

FY 2015-16
Governor's Budget Request

Seven budget items, totaling nearly $26.8 million, of the $86.4 million in new funding are dedicated to programs and initiatives within the Office of Children, Youth and Families.

Components of the request that relate to county child welfare operations and/or funding include the following:

- County Child Welfare Workload Study
- Modernizing the Child Welfare Case Management System
- Collaborative Management Program
- Prevention and Early Intervention
- One Percent Provider Rate Increase

County Child Welfare Workload Study

DHS requests a total of $8,227,138 and .9 FTE to increase county child welfare staffing as a result of the findings of the recent study conducted by the Office of the State Auditor.

Request Component	Amount Request
County Child Welfare Staffing	$ 7,876,675
• Funding for 130 new county child welfare staff	
Training Development and Training Certification Specialist FTE	$ 115,463
• Funding for the development of new training for new county staff • FTE in the Division of Child Welfare Training Unit for certification of new county staff	
Monitoring and Caseload Study	$ 235,000
• Funds to further analyze caseload ratios and monitor the impact the 130 additional child welfare staff on the overall system before requesting additional funding for the remaining 520 child welfare staff recommended in the workload study	

Modernizing the Child Welfare Case Management System

DHS requests a total of $6,824,567 and 2.7 FTE to modernize the Child Welfare Case Management System and hire staff to support the project.

- See next page for table

Modernizing the Child Welfare Case Management System

Request Component	Amount Request
Professional Services	$ 3,148,588
• Funding for nineteen (19) contract staff in the Governor's Office of Information Technology to create a development team of various contracted positions. • Temporary leased office space for new development team	
Software	$ 551,000
• Funding for associated software, reports builds, and database services	
Equipment	$ 2,800,000
• Increase number of servers from thirty (30) to fifty (50)	
Contingency	$ 324,979
• Five percent (5%) contingency allowance for project costs	
Oversight of Trails Modernization	$ 191,758

• FTE in the Division of Child Welfare to provide oversight to a dedicated Trails team that will enhance and modernize Trails
  ○ FTE Budget Analyst
  ○ FTE Data Programmer/Analyst
  ○ FTE Administrative Assistant	

Collaborative Management Program

DHS requests a total of $2,139,104 to increase funding for the Collaborative Management Program, which promotes use of local community partnerships and resources to keep children out of the youth corrections and families out of the child welfare system.

Request Component	Amount Request
Collaborative Management Cash Fund Increase	$ 2,000,000
• Increase funding to support county Collaborative Management programs and ensure there is an adequate level of funds to continue service to children/youth involved with multiple agencies	
Oversight of Collaborative Management Program	$ 139,104

• FTE in the Division of Child Welfare to assure the program operates according to statutory requirements and regulations; monitor outcomes; track DCW children who are participating in and receiving CMP services; and consolidate local reports to better understand and capture how CMP are being spent.
  ○ 1.0 FTE Program Administrator
  ○ 1.0 FTE Administrative Assistant	

Prevention and Early Intervention Services for At-Risk Youth

DHS requests a total of $1,651,107 to fund a pilot program that will target two evidence-based programs, Functional Family Therapy and Multi-Systemic Therapy, towards at-risk youth. In addition, the request will fund a rigorous evaluation of the pilot program.

- See next page for table

Prevention and Early Intervention Services for At-Risk Youth

Request Component	Amount Request
Functional Family Therapy Pilot Program	$ 720,000*
• Create a pool of funding for three to six sites to implement Functional Family Therapy, which is a family therapy intervention designed to assess family behaviors that contribute to delinquent behavior, in an effort to improve family communication, train family members to negotiate effectively, and set clear rules about privileges and responsibilities.	
Multi-Systemic Therapy Pilot Program	$ 594,000*
• Create a pool of funding for three sites to implement Multi-Systemic Therapy, which is a family therapy model focused on seriously dysfunctional families and may include youth with substance abuse and mental health diagnoses	
Temporary FTE	$ 172,107

• 2.0 Temporary FTE in the Division of Child Welfare to oversee the implementation of the pilot program
  ○ 1.0 FTE Program Coordinator
  ○ 1.0 Support Staff	

Pilot Program Evaluation	$ 165,000
• Colorado-specific research on the impact of targeting Functional Family Therapy and Multi-Systemic Therapy towards at-risk youth before they enter the juvenile justice system or have extensive involvement in the Child Welfare system	
* These totals represent 6 months of service in the first year to allow for a ramp-up year.	

One Percent Provider Rate Increase

DHS requests a total of $7,206,903 for a 1.0% rate increase for contracted community providers. Provider rate increases apply to community programs and services provided by contracted providers or county staff.

Request Component	Amount Request
1.0% rate Increase	$ 7,206,903
• Increase to enable providers to address rising costs for labor and supplies	

Child Welfare Performance Audit

The Audit reaffirmed the work being conducted as part of the Governor’s child welfare plan
"Keeping Kids Safe and Families Healthy".

Keeping Kids Safe and Families Healthy

There are numerous other enhancements that we have undertaken to make Colorado the most effective 21st century health and human services system in the nation, including:

- Developing a common practice approach that includes expanding Differential Response;
- A new statewide hotline to report suspected child abuse and neglect that will launch on-time and on-budget in January;
- Creating new prevention programs to help families before they become involved in the child welfare system – SafeCare, Community Response and expansion of Nurse Family Partnership;
- Utilizing data from your County Scorecards and C-Stat to focus on positive outcomes for kids and parents; and
- Redesigning the Child Welfare Training Academy and ensuring that caseworkers, supervisors, other staff and foster parents are well trained and ready to assist children and families.

Child Welfare Performance Audit Recommendations

- On November 12, 2014, the Office of the State Auditor released their performance audit of the Department's Division of Child Welfare.
- In total, there are **16 recommendations** with 47 sub-parts.
- CDHS agreed with 31 of the sub-parts and partially agreed with 6 sub-parts.
- CDHS disagreed with 10 sub-parts.
- **We have already completed 11 Of the 37 sub-parts**, so we are have completed 30% of our findings to date.
- Our next steps will be to finalize our work plan for the 21 remaining agreed upon audit recommendations.

Recommendation 1A

The Department of Human Services should ensure that counties make appropriate child welfare referral screening decisions based on established requirements by working with the State Board of Human Services as needed to:

A. Implement guidance and training that clarifies how counties should interpret statutes and rules and use referral information, including additional insight obtained through enhanced screening, to determine if an allegation could indicate known or suspected child abuse or neglect, and meets the legal definition of abuse or neglect. The guidance and training should also be clear regarding (i) how a child not making an outcry of abuse should influence the screening decision and (ii) whether a referral can be screened out solely on the basis that one parent indicates some ability to keep a child safe. The Department should consider providing vignettes based on real-life scenarios so that counties have concrete examples from which to draw when deciding how to screen a referral.

Response to Recommendation 1A

PARTIALLY AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to provide county departments with clear guidance and training regarding factors that should be considered in making the screening decision to ensure that counties make appropriate child welfare referral screening decisions based on established requirements. This finding is consistent with the Governor's plan, "Keeping Kids Safe and Families Healthy 2.0," which led to House Bill 13-1271 requiring the creation of a statewide child abuse and neglect reporting hotline system, effective on January 1, 2015.

In anticipation of this new law, the Department initiated rulemaking relative to training, certifications, and enhanced screening requirements, which will apply to all workers who are responsible for hotline and screening decisions. This requirement includes an annual recertification for hotline workers and supervisors.

Response to Recommendation 1A

PARTIALLY AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The proposed rules will mandate enhanced screening and RED team requirements in all counties by January 2015. All counties were trained in 2014 on these protocols. Following training, CDHS staff observed each county's RED team process and provided technical assistance regarding the fidelity of their model.

The Department disagrees with the recommendation to provide vignettes based on real-life scenarios. The Department already uses vignettes in Modules 2 and 3 of the training. In addition, the new hotline will record all phone reports of child abuse and neglect to be used in trainings to be developed.

Recommendation 2B

The Department of Human Services should strengthen its performance measures and monitoring related to counties making actual contact with children within assigned response times by:

B. Developing and publicly reporting a separate performance measure that reflects actual initial contacts with children on the Community Performance Center. This could be in addition to existing performance measures.

Response to Recommendation 2B

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to develop and publicly report an additional outcome indicator that reflects actual initial contacts with children on the Community Performance Center's website.

Recommendation 3A

The Department of Human Services should ensure that children's safety and risk of abuse or neglect are assessed in a thorough and timely manner by:

A. Establishing clearer written guidance on how caseworkers should identify child safety concerns in situations that may be difficult to assess, such as those involving substance use, and determine when overrides of risk assessment scores are appropriate. This should include working with the State Board of Human Services as needed.

Response to Recommendation 3A

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to establish clearer written guidance on how caseworkers will identify child safety concerns in situations that may be difficult to assess, such as those involving substance use, and determine when overrides of risk assessment scores are appropriate.

Recommendation 3C

The Department of Human Services should ensure that children's safety and risk of abuse or neglect are assessed in a thorough and timely manner by:

C. Modifying Trails so that supervisors can clearly document their review and approval of the safety and risk assessment tools before approving closure of the overall assessment.

Response to Recommendation 3C

AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to modify Trails so that supervisors can clearly document their review and approval of the safety and risk assessment tools before approving closure of the overall assessment. While this functionality will exist in Trails by January 2015, counties will only have access to it once they have been properly trained. These trainings will occur throughout the first part of 2015.

Recommendation 3D

The Department of Human Services should ensure that children's safety and risk of abuse or neglect are assessed in a thorough and timely manner by:

D. Enforcing requirements for caseworkers to request, and supervisors to approve, extensions when assessments need to take longer than 30 days, and for supervisors to document their approval in Trails.

Response to Recommendation 3D

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees with this recommendation. The Department will propose to the State Board of Human Services to remove the 30 day case closure requirement in rule in order to align with statute. If the State Board maintains the current rule then the Department agrees to enforce requirements for caseworkers to request and their supervisor to document approval of extensions when assessments need to take longer than 30 days.

Recommendation 3E

The Department of Human Services should ensure that children's safety and risk of abuse or neglect are assessed in a thorough and timely manner by:

E. Ensuring that all Department staff who interact with county departments of human/social services for the purposes of child welfare activities understand the requirements regarding documenting sufficient assessment details in Trails and consistently communicate the requirements to counties.

Response to Recommendation 3E

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to ensure that all Department staff who interact with county departments for the purposes of child protective services understand the requirements regarding documenting assessment details in Trails and consistently communicate the requirements to counties.

Recommendation 4A

The Department of Human Services (Department) should improve its Child Fatality Review Team process by:

A. Implementing a process to (i) provide Child Fatality Review Team members written information on the county violations identified by Department staff so that members can more easily participate in the process of identifying violations of statutes and rules and (ii) allow members to review and provide feedback on all reports before they are finalized.

Response to Recommendation 4A

PARTIALLY AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department supports virtually any process that would enable the volunteer Child Fatality Review Team (CFRT) members to more easily participate. However, the Department can only partially agree with this recommendation because it would require additional resources and statutory changes to either ease the timeframes, create more than one CFRT team and secure additional staff to support those teams, or have fewer cases to review based upon changing the criteria of who or what is reviewed. Part (ii) would require statutory changes either allowing more time after the county has reviewed the report and responded and before it is released to the public, or additional CFRT teams. Additional teams would allow the volunteer CFRT members more time between meetings to read and provide feedback on draft reports. Without this additional time, it is unlikely that CFRT members would have the time necessary to both review files for new incidents while also reviewing draft reports.

Recommendation 4B

The Department of Human Services (Department) should improve its Child Fatality Review Team process by:

B. Working with the State Board of Human Services to promulgate rules in accordance with Sections 26-1-139(4)(i) and (7), C.R.S., to provide additional guidance on the Child Fatality Review Team process, including (i) what factors should be covered in reviews to comply with statute, (ii) what information should be included in annual reports to policy makers, and (iii) requiring the Child Fatality Review Team to request responses for implementing recommendations and include the responses in the final review reports.

Response to Recommendation 4B

PARTIALLY AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to work with the State Board of Human Services to promulgate rules in accordance with Sections 26-1-139(4)(i) and (7), C.R.S., to provide additional guidance on the Child Fatality Review Team (CFRT) process, including what factors will be covered in reviews to comply with statute, what information will be included in annual reports to policy makers, and requesting and including responses in the final review reports. However, the Department believes that the implementation of the recommendations should be monitored at the local level by the Division of Child Welfare, not the CFRT.

Recommendation 4C

The Department of Human Services (Department) should improve its Child Fatality Review Team process by:

C. Implementing written guidance to use performance data and other information in a consistent manner when determining whether a recommendation should be made. This should include (i) using performance data that reflect a consistent and appropriately broad time horizon, are comprehensive, and are applied consistently across reports; (ii) establishing a standard that the performance data must show performance at or above the Department's benchmarks for a pre-determined period; and (iii) establishing when it is appropriate to rely on current or planned efforts to address a deficiency.

Response to Recommendation 4C

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to implement written guidance to use performance data and other information in a consistent manner when determining whether a recommendation should be made. This will include using performance data that reflect a consistent and appropriately broad time horizon, are comprehensive, and are applied consistently across reports; establishing a standard that the performance data must show performance at or above the Department's benchmarks for a pre-determined period; and establishing when it is appropriate to rely on current or planned efforts to address a deficiency. The Department will take the written guidance to the Child Fatality Review Team (CFRT) members and seek approval of the methodology as all findings and recommendations are the exclusive responsibility of the CFRT.

Recommendation 5A & 5B

The Department of Human Services should improve county reporting of egregious incidents of abuse and neglect by:

A. Working with the State Board of Human Services to further define in rules, or implementing through other formal mechanisms, egregious incidents of child abuse and neglect that require review.

B. Providing training and guidance to county departments of human/social services on the identification and reporting of egregious incidents.

Response to Recommendation 5A

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to further define egregious incidents of child abuse and neglect that require review. Egregious incidents were created in statute in 2012, based upon a recommendation by this administration. Colorado joins Wisconsin as the only two states in the country that require review and reporting of egregious incidents. Given the lack of national precedence, Colorado moved forward with implementation with this law while gathering experience that will now go into policy guidance. This has been our intended approach since statute was enacted. The Department is conducting a policy and research analysis to examine the components of the existing statutory definition within the context of child welfare. This effort will result in written policy guidance that can be updated and refined through use with the Child Fatality Review Team and counties.

Response to Recommendation 5B

AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to provide training and guidance to county departments on the identification and reporting of egregious incidents. The guidance will be accomplished as described in part “a” above, and, was part of the intended approach since statute was enacted. Training related to the reporting of egregious incidents of abuse and neglect is already provided in Modules 2 and 3 of the Child Welfare Training Academy. This training will be enhanced based on this analysis and included in the new training contract with the Kempe Center by July 2015. It is important to note that while training and guidance will help with recognition of egregious incidents, we are not convinced that it is sufficient to resolve the problems of timeliness of egregious incidents as identified in the audit.

Recommendation 6A

The Department of Human Services should ensure compliance with the requirements for providing certain mandatory reporters with information about cases they have reported to the county by:

A. Working with the State Board of Human Services to promulgate in rule, or implementing through other formal mechanisms, guidance for counties regarding (i) what it means for a county to have “actual knowledge” that mandatory reporters continue to be officially and professionally involved with the child for whom they made a report of suspected abuse or neglect and (ii) the type of information a county may provide mandatory reporters to allow them to fulfill their professional and official roles in maintaining a child’s safety.

Response to Recommendation 6A

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to work with the State Board of Human Services to promulgate in rule, or implement through other formal mechanisms, guidance for counties regarding what it means for a county to have “actual knowledge” that mandatory reporters continue to be officially and professionally involved with the child for whom they made a report of suspected abuse or neglect, and the type of information a county may provide mandatory reporters to allow them to fulfill their professional and official roles in maintaining a child’s safety.

Recommendation 6B

The Department of Human Services should ensure compliance with the requirements for providing certain mandatory reporters with information about cases they have reported to the county by:

B. Working with the State Board of Human Services to modify the rule that requires counties to inform all reporting parties when their referrals are screened out (Section 7.202.4.C, 12 C.C.R. 2509-3) so that rules are consistent with Section 19-1-307(2)(e.5), C.R.S.

Response to Recommendation 6B

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to work with the State Board of Human Services to modify the rule that requires counties to inform all reporting parties when their referrals are screened out (Section 7.202.4.C, 12 C.C.R. 2509-3) so that rules are consistent with Section 19-1-307(2)(e.5), C.R.S.

Recommendation 6C

The Department of Human Services should ensure compliance with the requirements for providing certain mandatory reporters with information about cases they have reported to the county by:

C. Expanding the reviews conducted by the Administrative Review Division to include assessments of whether the county complied with requirements to notify mandatory reporters of case information when required.

Response to Recommendation 6C

AGREE. IMPLEMENTATION DATE: APRIL 2016.

The Department agrees to expand the reviews conducted by the Administrative Review Division (ARD) to include assessments of whether the county complied with requirements to notify mandatory reporters of case information when required. The Department agrees to monitor the limited information (checkbox) currently available in Trails. The Department would like to enhance the reviews to be more meaningful and will work with its county partners to do so. This would require resources for the modification of Trails as the system does not currently provide the ability for workers to document all of the mandated reporter notification requirements. If Trails is modified, ARD will convene a workgroup to align the review tool to the changes in Trails for notification to mandatory reporters.

Recommendation 6D

The Department of Human Services should ensure compliance with the requirements for providing certain mandatory reporters with information about cases they have reported to the county by:

D. Pursuing a modification of Trails to capture data needed to facilitate monitoring of counties' compliance with notifying mandatory reporters of case information when required and enforcing requirements for counties to document their compliance in Trails.

Response to Recommendation 6D

AGREE. IMPLEMENTATION DATE: JANUARY 2016.

The Department recognizes the importance of notifying mandatory reporters with information about cases they have reported to the county department. While the Department agrees to pursue this modification, it is contingent upon additional resources to build out Trails, as well as to collaborate with our county partners to pursue the appropriate changes.

Recommendation 6E

The Department of Human Services should ensure compliance with the requirements for providing certain mandatory reporters with information about cases they have reported to the county by:

E. Implementing a process to regularly analyze Trails data and the results of reviews conducted by the Administrative Review Division to monitor counties' compliance with notification requirements and provide technical assistance to counties based on the analysis.

Response to Recommendation 6E

AGREE. IMPLEMENTATION DATE: JULY 2016.

The Department recognizes the importance of implementing a process to regularly analyze Trails data and the results of reviews conducted by the Administrative Review Division to monitor counties' compliance with notification requirements and provide technical assistance to counties based on the analysis. The Department agrees to monitor the limited information (checkbox) currently available in Trails.

Recommendation 7

The Department of Human Services should work with child welfare and county stakeholders to assess whether Child Protection Teams are still needed and work with the General Assembly on statutory changes to either make Child Protection Teams effective as an oversight mechanism for the child welfare system or to eliminate the requirement for Child Protection Teams.

Response to Recommendation 7

AGREE. IMPLEMENTATION DATE: JUNE 2015.

The Department agrees to work with child welfare and county stakeholders to assess whether Child Protection Teams are still needed, and work with the Legislative Audit Committee and General Assembly on statutory changes to either make Child Protection Teams effective as an oversight mechanism for the child welfare system or to eliminate the requirement for Child Protection Teams.

Recommendation 8A

As long as Child Protection Teams continue in their current form, the Department of Human Services should improve their use as an oversight mechanism by:

A. Seeking legal guidance from the Office of the Attorney General on whether statute as currently written allows for counties to employ a risk-based approach for determining which cases should be reviewed by a Child Protection Team. Based on that guidance either (i) work with the State Board of Human Services to promulgate rules on how to employ a risk-based approach for selecting which cases are reviewed by the Child Protection Team, or (ii) work with the General Assembly to seek statutory change to allow for a risk-based approach.

Response to Recommendation 8A

AGREE. IMPLEMENTATION DATE: OCTOBER 2015.

The Department agrees to seek legal guidance from the Office of the Attorney General on whether statute as currently written allows for counties to employ a risk-based approach for determining which assessments should be reviewed by a Child Protection Team (CPT). The Department believes that CPTs best serve children and their communities when led at the local level; and, that counties should have sufficient flexibility to meet their unique community needs. Based on the guidance from the Office of the Attorney General, the Department will engage its county partners to either work with the State Board of Human Services to promulgate rules on how to employ a risk-based approach for selecting which assessments are reviewed by the CPT or work with the General Assembly to seek statutory change to allow for a risk-based approach.

Recommendation 8B

As long as Child Protection Teams continue in their current form, the Department of Human Services should improve their use as an oversight mechanism by:

B. Working with the State Board of Human Services to promulgate rules providing parameters for counties to determine (i) which cases should be reviewed by Child Protection Teams, (ii) when in the case the Child Protection Teams should review the case, (iii) how the results of the Child Protection Team review should be used by the counties to improve their cases and processes, and (iv) how to publicly report the results.

Response to Recommendation 8B

AGREE. IMPLEMENTATION DATE: OCTOBER 2015.

If there is no statutory change to eliminate CPTs, the Department agrees to engage its county partners, and will work with the State Board of Human Services to promulgate rules providing parameters for counties to determine which assessments will be reviewed by CPTs, when in the assessment the CPTs will review the assessment, how the results of the CPT reviews will be used by the counties to improve their assessments and processes, and how to publicly report the results. The Department believes that CPTs best serve children and their communities when led at the local level; and, that counties should have sufficient flexibility to meet their unique community needs.

Recommendation 9C

The Department of Human Services (Department) should ensure that it exercises appropriate authority when advising and overseeing counties regarding requirements for the child welfare system by:

C. Based on the opinion of the Attorney General obtained in response to PART A, as well as the Attorney General's recent guidance to the Department regarding its authority to establish and enforce policies, taking steps to communicate any changes in practice or expectations. This should include informing Department staff who provide technical assistance to counties of any new Department policies or practices and revising quality assurance review tools used by the Administrative Review Division as needed.

Response to Recommendation 9C

PARTIALLY AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department partially agrees with this recommendation. The Department disagrees and will not seek an opinion of the Attorney General as requested in part “a.”

The Department agrees to communicate changes in practice or expectations. This will include informing Department staff who provide technical assistance to counties of any new Department policies or practices and revising the review process used by the Administrative Review Division as needed.

Recommendation 11A

The Department of Human Services should promote compliance with the statutory requirement that county departments of human/social services establish cooperative agreements with the law enforcement agencies in their jurisdictions by:

A. Working with the State Board of Human Services to promulgate in rule, or otherwise provide, formal written guidance on (i) establishing effective cooperative agreements and (ii) reviewing and updating the agreements on a specified frequency.

Response to Recommendation 11A

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to work with the State Board of Human Services to promulgate in rule, or otherwise provide formal written guidance, on establishing effective cooperative agreements by March 2015 and reviewing and updating the agreements on a specified frequency by January 2015.

Recommendation 11B

The Department of Human Services should promote compliance with the statutory requirement that county departments of human/social services establish cooperative agreements with the law enforcement agencies in their jurisdictions by:

B. Implementing processes to obtain county agreements, including any time the agreements are revised; review the agreements for compliance with requirements in statute, rule, and applicable guidance; and provide technical assistance to counties that do not have adequate agreements.

Response to Recommendation 11B

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to implement processes to obtain county agreements, including any time the agreements are revised; review the agreements for compliance with requirements in statute, rule, and applicable guidance; and provide technical assistance to counties that do not have adequate agreements. This action alone may not be sufficient as neither CDHS nor any other single State agency has the authority to enforce this requirement upon local law enforcement agencies and there are no consequences should a local law enforcement agency refuse to enter into an agreement as was identified in the audit.

Recommendation 11C

The Department of Human Services should promote compliance with the statutory requirement that county departments of human/social services establish cooperative agreements with the law enforcement agencies in their jurisdictions by:

C. Providing a statewide agreement with Colorado State Patrol that counties can use, or ensuring that counties create a separate agreement.

Response to Recommendation 11C

AGREE. IMPLEMENTATION DATE: JANUARY 2015.

The Department agrees to keep its statewide agreement with the Colorado State Patrol up to date and to make it available so all county departments have the choice to sign on to the statewide agreement or create a separate agreement of their own that complies with statutes and rules.

Recommendation 12A

The Department of Human Services (Department) should improve its oversight of the Collaborative Management Program (CMP) by:

A. Establishing procedures and deadlines to comply with State Board of Human Services (State Board) rules for submitting and accepting memoranda of understanding (MOUs) or working with the State Board to revise the deadlines. The Department should then communicate the due dates to county-level programs and discontinue allocating incentive funds to county-level programs that do not submit MOUs in accordance with rules.

Response to Recommendation 12A

AGREE. IMPLEMENTATION DATE: JUNE 2015.

The Department agrees to establish procedures and deadlines to comply with State Board of Human Services rules for submitting and accepting MOUs or working with the State Board to revise the deadlines. The Department will then communicate the due dates to county-level programs and discontinue allocating incentive funds to county-level programs that do not submit MOUs in accordance with rules.

Recommendation 12B

The Department of Human Services (Department) should improve its oversight of the Collaborative Management Program (CMP) by:

B. Establishing processes to determine whether county-level programs have "successfully implemented the elements of collaborative management," working with the State Board as needed. This should include working with the Judicial Department to revise the MOU template to adequately capture statutory and regulatory requirements, including defining the target population and detailing expectations and requirements for collaborative management processes; promulgating and communicating guidance; and establishing MOU review criteria and checklists.

Response to Recommendation 12B

AGREE. IMPLEMENTATION DATE: JUNE 2015.

The Department agrees to establish processes to determine whether county-level programs have "successfully implemented the elements of collaborative management," and work with the State Board to promulgate rules as needed. This will include working with the Judicial Department to revise the MOU template to adequately capture statutory and regulatory requirements, including defining the target population and detailing expectations and requirements for collaborative management processes; promulgating and communicating guidance; and establishing MOU review criteria and checklists.

Recommendation 12D

The Department of Human Services (Department) should improve its oversight of the Collaborative Management Program (CMP) by:

D. Establishing a monitoring program to (i) determine whether county level programs have implemented collaborative management in accordance with statute, rule, and MOUs and (ii) verify the accuracy and reliability of county-level program performance data used to award incentive funding.

Response to Recommendation 12D

AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to establish a monitoring program to determine whether county-level programs have implemented collaborative management in accordance with statute, rule, and MOUs; and to verify the accuracy and reliability of county-level program performance data used to award incentive funding. However, without additional resources, the Department will only be able to monitor one collaborative per quarter.

While the Department believes that such limited monitoring is insufficient, no administrative funds are allocated to the Department for this program with the exception of funds for the statutorily required external evaluation. The Department has repurposed a 0.5 FTE from existing staff. To increase the number of Collaborative Management Programs monitored per quarter, additional staffing resources would be required.

Recommendation 12E

The Department of Human Services (Department) should improve its oversight of the Collaborative Management Program (CMP) by:

E. Revising the allocation methodology to ensure that it incentivizes and rewards performance in an equitable manner within the funds available, and uses actual data on participants served to allocate incentive payments.

Response to Recommendation 12E

AGREE. IMPLEMENTATION DATE: JULY 2015.

E. The Department agrees to work with the county departments to revise the allocation methodology to ensure that it incentivizes and rewards performance in an equitable manner within the funds available, and use actual data on participants served to allocate incentive payments.

Recommendation 13 A

The Department of Human Services should improve its management of general fund savings from the Collaborative Management Program (CMP) by:

A. Working with the State Board of Human Services to promulgate a rule to determine general fund savings resulting from the CMP as set forth in Section 24-1.9-102(2)(h)(I), C.R.S.

Response to Recommendation 13A

PARTIALLY AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department will work with the Child Welfare Allocation Committee and the State Board of Human Services to promulgate a rule to determine general fund savings resulting from the Collaborative Management Program (CMP) as set forth in Section 24- 1.9-102(2)(h)(I), C.R.S. The Department sees a conflict between Title 24 and Title 26. The conflict arises as Title 24 directs the State Board to promulgate rules regarding general fund savings from the CMP, while Title 26 empowers the Child Welfare Allocation Committee to recommend the allocation of any unexpended capped funds at close out.

Recommendation 13 C

The Department of Human Services should improve its management of general fund savings from the Collaborative Management Program (CMP) by:

C. Seeking further legal guidance on the use of surplus funds for distributing general fund savings, and proposing legislative change to establish a mechanism for distributing general fund savings, if needed.

Response to Recommendation 13C

AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to seek further legal guidance on the use of surplus funds for distributing general fund savings and proposing legislative change to establish a mechanism for distributing general fund savings, if needed.

Recommendation 14 B

The Department of Human Services (Department) should improve accountability for the Collaborative Management Program (CMP) by:

B. Developing improved data collection and reporting protocols for programmatic and expenditure data and requiring all county departments of human/social services that participate in county-level programs to comply with them. This could include requiring county departments to identify CMP participants in the child welfare system in Trails so that participant demographics, services, outcomes, and expenditures can be tracked and monitored.

Response to Recommendation 14B

PARTIALLY AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to develop improved data collection and reporting protocols for programmatic and expenditure data, and require all county departments that participate in county-level programs to comply. The Department believes that Collaborative Management Programs (CMP) best serve children and their communities when led at the local level; and, those counties should have sufficient flexibility to meet their unique community needs. The Department will partner with counties and other participating members of the CMPs to develop these new processes to be realistic and achievable . . . . *Cont.*

Response to Recommendation 14B

PARTIALLY AGREE. IMPLEMENTATION DATE: JULY 2015.

However, the Department disagrees with requiring county departments to identify CMP participants in the child welfare system in Trails. CMPs serve participants from one or more of the following domains: health/mental health, education, juvenile justice, and child welfare, some of which do not have access to Trails, the statewide automated case management system for child welfare. Therefore, having some CMP participants in one data system and others in another data system(s) does not represent an improvement in data collection and reporting protocols.

Recommendation 14 C

The Department of Human Services (Department) should improve accountability for the Collaborative Management Program (CMP) by:

C. Assessing options for implementing a single data system to maintain CMP data. This should include determining whether to acquire capacity to bring data collection and management, currently performed by the contractor, in-house or evaluating the feasibility of improving the interoperability of existing state information systems to better track CMP data.

Response to Recommendation 14C

AGREE. IMPLEMENTATION DATE: JULY 2015.

The Department agrees to assess options for implementing a single data system to maintain Collaborative Management Program (CMP) data. This will include determining whether to acquire capacity to bring data collection and management, which is currently performed by the contractor, in-house or evaluating the feasibility of improving the interoperability of existing state information systems to better track CMP data.

Recommendation 15 A

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department of Human Services (Department) should ensure successful expansion of differential response by:

A. Establishing guidance that clearly defines risk levels that influence whether a differential response assessment is appropriate and clarifies how different factors can influence a child's risk of maltreatment. This should include working with the State Board of Human Services as appropriate.

Response to Recommendation 15A

AGREE. IMPLEMENTATION DATE: AUGUST 2015.

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department agrees to establish guidance that clearly defines risk levels that influence whether a differential response assessment is appropriate, and clarifies how different factors can influence a child's risk of maltreatment. This will include working with the State Board of Human Services to promulgate rules, as appropriate.

Recommendation 15 B

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department of Human Services (Department) should ensure successful expansion of differential response by:

B. Enforcing Department policies and guidance or working with the State Board of Human Services to codify in rules all requirements that counties must follow when handling assessments and cases through differential response.

Response to Recommendation 15B

AGREE. IMPLEMENTATION DATE: AUGUST 2015.

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department agrees to enforce Department policies and guidance or work with the State Board of Human Services to codify in rules all requirements that counties must follow when handling assessments and cases through differential response. Differential response is a pilot program in Colorado, and as with all pilot programs, the Department has been testing all approaches at both the county and state levels. The Department has also contracted for an independent evaluation by the Colorado State University School of Social Work and will use the results of the evaluation to guide its policy and oversight of the program.

Recommendation 15 C

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department of Human Services (Department) should ensure successful expansion of differential response by:

C. Implementing a more robust process for monitoring differential response activities that includes modifying Trails so the Department can easily monitor the risk level of referrals undergoing differential response assessments.

Response to Recommendation 15C

AGREE. IMPLEMENTATION DATE: JANUARY 2016.

If the General Assembly enacts legislation to continue the use of differential response beyond July 1, 2015, the Department agrees to implement a more robust process for monitoring differential response activities that includes modifying Trails so the Department can easily monitor the risk level of referrals undergoing differential response.

Recommendation 16 A

The Department of Human Services should ensure that counties statewide implement the Review, Evaluate, and Direct (RED) Team process consistently and effectively by:

A. Establishing guidance that clarifies (i) instances when counties must use RED Teams and when counties have discretion to use a different referral screening method, and (ii) how counties should document RED Team discussions and supervisory approval of RED Team decisions. This should include working with the State Board of Human Services as appropriate.

Response to Recommendation 16 A

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to establish guidance that clarifies instances when counties must use RED Teams and when counties have discretion to use a different referral screening method, and clarifies how counties will document RED Team discussions and supervisory approval of RED Team decisions. This will include working with the State Board of Human Services to promulgate rules, as appropriate. The Department is already in the process of moving this practice model from a pilot to statewide implementation through standard operating procedures.

Recommendation 16 B

The Department of Human Services should ensure that counties statewide implement the Review, Evaluate, and Direct (RED) Team process consistently and effectively by:

B. Adding a component to the Administrative Review Division's quality assurance reviews that includes reviewing Trails documentation that supports RED Team decisions for referrals that are assigned for assessment.

Response to Recommendation 16 B

AGREE. IMPLEMENTATION DATE: OCTOBER 2015.

The Department agrees to add a component to the Administrative Review Division's (ARD) quality assurance reviews that includes reviewing Trails documentation that supports RED Team decisions for referrals that are assigned for assessment. The ARD initiated instrument review workgroups in October 2014. The work specific to this recommendation will be incorporated into those workgroups. The resultant instruments will be piloted in July 2015 with an anticipated effective date of October 2015.

Recommendation 16 C

The Department of Human Services should ensure that counties statewide implement the Review, Evaluate, and Direct (RED) Team process consistently and effectively by:

C. Modifying Trails so the database fields more closely align with the factors that RED Teams consider during their discussions.

Response to Recommendation 16 C

AGREE. IMPLEMENTATION DATE: MARCH 2015.

The Department agrees to modify Trails so the database fields more closely align with the factors that RED Teams consider during their discussions.

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