

# 2nd Interim Report of the Governor's Child Welfare Action Committee

Presented to:  
**Governor Bill Ritter, Jr.**  
September 28, 2009



Colorado Department of Human Services  
*people who help people*

Prepared By:  
The Colorado Department  
of Human Services

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## Executive Summary

Since July 2008, the Governor's Child Welfare Action Committee has been working on formulating recommendations for the Governor's consideration to improve the permanency, safety and well-being for children and their families. Thirteen of those recommendations were presented to Governor Bill Ritter, Jr. on October 31, 2008. The recommendations presented to him were:

- **Mandatory Reporters of Child Maltreatment**  
The Colorado Department of Human Services (Department) shall amend rules that specify how and when county departments and the State provide case progress information to mandatory reporters of specific referrals of child abuse and neglect.
- **Quality Assurance and State Leadership on Cultural Diversity Issues**  
The Department will develop and implement a program to work with counties, other agencies and communities on issues related to culture and diversity.
- **Pre-Service Training for Child Welfare Caseworkers, Supervisors and Case Aides**  
The Department will create and provide pre-service training for new child welfare caseworkers, new or promoted child welfare supervisors and new child welfare case services aides.
- **Pre-Service Training for Child Abuse/Neglect Hotline Staff**  
The Department will create and provide pre-service training for newly hired hotline staff.
- **Expansion of the Child Welfare Educational Stipend Program**  
The Department will work with institutions of higher education, which have an accredited school of social work, to expand, develop and implement an educational stipend program for 150 social work students.
- **Evaluation of Training Effectiveness**  
The Department will expand the training evaluation process to assure that the training objectives are congruent with practice standards and guidelines.
- **Domestic Violence Representation in Collaborative Management Programs**  
Require that all Collaborative Management Programs created under HB04-1451 include a domestic violence representative on the Interagency Oversight Group.
- **Assessing Domestic Violence in Child Abuse and Neglect Reports**  
Child welfare staff will collaborate and coordinate with the Colorado Works programs regarding the use of the domestic violence assessment tool available in the Family Violence Option Waiver to support victims of domestic violence in their efforts to become self-sufficient.

- **Utilizing Judicial Records**  
County staff will be required to access judicial records through existing available data systems such as LexisNexis.
- **Utilize Temporary Assistance for Needy Families Reserves to Support Domestic Violence Intervention and Prevention**  
The Department shall apply for a grant from the Strategic Use Fund. The Department will work with the Colorado Department of Public Health and Environment to implement a public education program regarding domestic violence.
- **Child Welfare Organizational Study and Workload Analysis**  
The Department will request legislation and funding strategies in order to conduct a workload analysis and codify the workload standards identified in the completed workload analysis.
- **Child Welfare Division Research and Performance Improvement Team**  
The Department will develop a decision item to add staffing and funding for a Research and Performance Improvement Team to the Division of Child Welfare.
- **Foster Care and Permanence Task Force Recommendations**  
Four of the recommendations from the Foster Care and Permanence Task Force have been integrated into the subcommittee work of the Governor's Child Welfare Action Committee: Oversight of counties compliance and workload study, youth will be adequately prepared for emancipation, provide increased support and services to kinship caregivers and children in out-of-home placements and develop a funding strategy to support casework staff training on the Colorado Safety Assessment Instrument.

Sixteen additional recommendations are presented to the Governor for consideration on September 28, 2009. The following recommendations represent increasing transparency and accountability for both the State and county departments, providing consistency in child maltreatment investigations and improving public access to services and resources in the child welfare system:

- **Centralized Call Center**  
To develop a centralized call center to receive all incoming child abuse/neglect calls for the State of Colorado on a 24/7 basis.
- **Access to Services**  
The Department shall establish protocols whereby both the county departments and the State assume accountability to ensure children and families are receiving consistent child welfare services.

- **Child Welfare System of Care**  
Colorado should create a child welfare system that incorporates and implements the following principles: Family preservation and strength; child safety; least restrictive and most appropriate service provision; accurate child service assessments; accurate identification for early intervention; single, collaborative, community-based service provision; new services are created when unmet needs of children and families are identified; ensure flexibility and require accountability at the local level; encourage public and private partnerships; and, increase interagency collaboration and family involvement.
- **Feedback to Mandatory Reporters of Child Abuse/Neglect**  
County departments who receive a referral would provide specific feedback to certain mandatory reporters within a prescribed timeframe.

The following six recommendations represent expanding evidence-based practice standards and improving resources and services for children and families in the child welfare system:

- **Differential Response**  
The Department will create and develop a differential response pilot program in no fewer than six counties. After two years, the pilot program will be subject to an independent evaluation to determine the effectiveness of the program.
- **In-Service Training for Child Welfare Caseworkers, Supervisors, Case Aides and Child Abuse/Neglect Hotline Staff**  
The Department will expand, create and provide ongoing in-service training for child welfare caseworkers, supervisors, case aides and child abuse/neglect hotline staff. The training will be provided annually on a statewide basis.
- **Use of a Family Centered Engagement Method**  
Involve the child's family in decision-making processes using a method that: Provides facilitated family meetings; documents the involvement of the family in the process; is used at various times throughout the life of a case; addresses placement options; and, addresses the cultural needs of the family.
- **Establish a Statewide Training Program to Address Concerns Around Cultural Competency**  
The Department will ensure that all child welfare training curricula addresses cultural competency issues and will evaluate the training for effectiveness.
- **Increase the Number of Kinship Care Homes and Culturally Appropriate Foster Homes**  
Recruit and train culturally appropriate foster homes.

- **Recruitment of Faith Based Resource Families**

The Department will promote partnerships with local communities of faith in order to increase foster and adoptive care recruitment and retention.

Recommendations made to increase accountability and monitor evaluation of practice as well as address issues raised by state audits include:

- **Accountability Mechanisms (Office of Child Advocate)**

An Office of Child Advocate shall be established and the Governor shall make a decision as to where to place this Office. The development of a standard grievance policy utilized consistently statewide. The existing accountability mechanisms should be reviewed with the purpose of evaluating their effectiveness.

- **Improve Child Welfare Data Quality and Evaluate Practice**

The Department will evaluate expansion of the current statewide automated reporting system capacity and related data collection policies to gather additional information to identify the race and ethnicity of Colorado children and families.

- **Corrective Action Plans and Sanctions**

The State Board of Human Services will promulgate provisions for a Corrective Action Process. The Performance Improvement Process related to federal standards will be tied to the Corrective Action Plan Process.

- **Change of Venue**

Amend Colorado Revised Statutes to set forth a specific time (30 days) by which all documents and reports must be sent to the receiving court and a specific time by which a status conference/review hearing must be held (15 days after receipt of documents by the court) when venue has transferred from one jurisdiction to another.

- **Child Welfare Quality Assurance Program**

The Department will establish an Office of Quality Improvement and Assurance within the Department of Human Services to oversee data analysis, improve transparency, determine outcome and performance measures and develop a random sampling of performance audits for county departments.

- **Organizational Structure for Delivering Child Welfare and Other Human Services in Colorado**

The State of Colorado shall adopt a state-supervised, regionally directed and regionally and locally implemented system for the delivery of social services.

## Introduction

On April 16, 2008, Governor Bill Ritter, Jr. issued an Executive Order B 006 08 creating the Governor's Child Welfare Action Committee (Committee) (Executive Order attached). The Committee began meeting in July 2008. The charge of the Executive Order is to provide recommendations on how to improve Colorado's child welfare system. Because the protection of children is the responsibility of many parties including parents, relatives, neighbors, foster parents, schools, law enforcement, courts, providers and many organizations within our communities, the members of the Committee were selected based on their knowledge, geography, experience, diversity and energy required to successfully address the challenges of the child welfare system. This document represents the second interim report, as required by Executive Order, of the policy, budgetary and legislative recommendations that have been adopted by the Committee.

The goals of the Committee were articulated in the Executive Order. The Committee has continued to focus upon making recommendations that will immediately improve the child welfare system in Colorado and assure the importance of the well-being of children. The Committee continues to be forward thinking and committed to addressing the systemic issues identified in the 2008 Interim Report.

### Governor's Child Welfare Action Committee Membership

**Karen Beye**, Executive Director Colorado Department of Human Services (Chair)

**Cyril (Skip) Barber**, Colorado Association of Family and Children Agencies

**Steve Burgess**, Lincoln County Commissioner

**Shirley Chapman**, Early Childhood Development

**Kenneth Crichlow, D.D.S.**, General Dentistry

**Katherine Delgado**, 17<sup>th</sup> Judicial District Judge

**Barbara Drake**, Director, Douglas County Department of Human Services

**Linda Fairbairn**, Director Prowers County Department of Social Services

**John Faught**, Kempe Foundation/Attorney

**Lynda Fox**, Child Advocate

**Rebecca Hobart**, Ariel Clinical Services for Children

**Mary W. Lewis**, Foster Parent/School Board Member

**James Martin**, Executive Director Colorado Department of Public Health and Environment

**Jose Mondragon**, Director, Pueblo County Department of Social Services



**Adrienne Pederson**, Denver Public Schools

**Kathay Rennels**, Larimer County Commissioner

**Patricia Schene**, American Humane Association

**Barbara Shaklee**, City and County of Denver Attorney

**Shari Shink**, Rocky Mountain Children's Law Center

**Theresa Spahn**, Office of Child's Representative

**Representative Debbie Stafford**, State Representative House District 40

**Deborah Valentine**, Colorado State University School of Social Work

**Lindy Wallace**, Colorado Department of Health Care Policy and Financing

**Kathryn Wells, M.D.**, Denver County Family Crisis Center

## **Mission and Scope**

The mission of the Governor's Child Welfare Action Committee is to provide recommendations to the Governor on improving the Colorado child welfare system. The ultimate goal is to reduce the neglect, injury and fatality rates for Colorado's children. The Committee continues to make policy, budgetary and legislative recommendations based on the following work:

- A. Analyzing the state-county organizational capacity and structure to determine whether this system is the most effective option for protecting children:
- B. Examining the quality and quantity of training that child care professionals should receive when working in the child protection field:
- C. Evaluating public access to state-county human services departments:
- D. Exploring the role that independent oversight committees can play in ensuring that human service agencies are held accountable for actions that might negatively impact families, children and the community at large:
- E. Developing recommendations as to how public/private partnerships can improve the services and care provided to children who reside within the welfare system:
- F. Reviewing evidence-based best practice standards to the extent practicable when recommending changes to the child welfare system.

## Subcommittees of the Governor's Child Welfare Action Committee

The Committee convened four subcommittees to address the scope of work outlined in the Executive Order. As the Committee's work continues, the scope and priority of subcommittee work may change. The initial four subcommittees providing recommendations to the Committee included:

- **Administrative Structure**: This subcommittee will evaluate the workforce needs of the state and counties; study the strengths and challenges of the state/county system; identify possible alternative structures; make recommendations regarding improving the current system or creating a new system; and develop a statewide workload analysis. Ms. Jenise May, Deputy Executive Director of Employment and Regulatory Affairs, is the State Lead and Commissioner Kathay Rennels, Larimer County, is the Co-Chair on this subcommittee.
- **Child and Family Outcomes**: This subcommittee will develop core outcome/performance indicators; establish an analytical framework for public child welfare; identify basic practice domains and service arrays necessary to meet the needs of children and families served by public child welfare; consider progressive incentives and sanctions based on performance, and define accountability mechanisms for consumers. Mr. Lloyd Malone, Director of Child Welfare, is the State Lead and Ms. Patricia Schene, American Human Association, is the Co-Chair on this subcommittee.
- **Cultural Competency**: This subcommittee will identify the underlying issues of disproportionate representation and disparate outcomes for children of color in the public child welfare system; identify strategies for improving outcomes for children of color, and enhance the cultural competency of caseworkers, supervisors, providers and the courts. Ms. Sharen Ford, Manager of the Permanency Unit, is the State Lead and Mr. Jose Mondragon, Director of Pueblo County Department of Social Services, is the Co-Chair on this subcommittee.
- **Training**: This subcommittee will identify core and advanced training curricula for caseworkers and casework supervisors; identify a process to recruit, train and retain a competent, credentialed workforce; and consider a Training Academy for these purposes that joins the efforts of public child welfare, public institutions of higher education, and experts in the field. Mr. Art Atwell, Director of Workforce Development Services, and Ms. Deborah Valentine, Colorado State University School of Social Work, is the Co-Chair on this subcommittee.

## Recommendations

The subcommittees have continued to identify additional issues, review data, hear expert testimony and consider incentives, benefits, efficacy and cost. Those suggestions were heard and discussed by the Committee. The following eight recommendations are presented in this report in priority order with the remaining recommendations listed in no specific order of priority:

### 14. Centralized Call Center

**Background Information:** The child abuse/neglect hotline is often the first connection for children and families with the child welfare system. There are multiple issues with the current state run/county administered system. Staff qualifications and consistent protocols for accepting information related to potential maltreatment of children vary for child abuse/neglect hotline staff. There are inconsistencies in how information is received at intake and how and when decisions for investigation are made. There is a perception that counties use subjective criteria in making decisions about which cases are accepted for investigation. Supervisory review and oversight is also inconsistent from county to county. Smaller counties do not have sufficient staff resources to provide 24/7 hotline coverage. It is difficult to determine liability for actions taken upon receiving a report of suspected abuse or neglect. There is confusion for mandatory reporters on where to report.

**Purpose:** A centralized call center would allow for greater access and less confusion statewide for persons making a referral of child maltreatment. The centralized call center staff would be responsible for making initial decisions for referring the call, the timeframe for action and determine the county department responsible. The county department to whom the referral is assigned would be required to investigate all referrals and would assume liability for its actions taken upon receiving the referral from the centralized call center.

**Recommendation:** To develop a centralized call center to receive all incoming child abuse/neglect calls for the State of Colorado on a 24/7 basis. This includes taking calls/referrals, accepting or rejecting reports and assigning referrals to counties for further investigation. Centralized intake will utilize the current statewide automated reporting system (TRAILS) to standardize protocols to collect information and make an initial assessment. The call center will refer the report to the appropriate county for investigation or for provision of other services. Counties would be required to investigate all referrals received from the call center in a timely manner.

The centralized call center will be staffed with state employees who are located in the Division of Child Welfare with adequate staffing to manage the volume of calls and reporting requirements. Call center employees will be trained and qualified as social casework staff with a bachelors degree, as a minimum qualification, complete training through the Training Academy for both intake and ongoing cases, and must have one year experience in direct provision of child protection services.

**Expected Outcomes:** Children, families and mandatory reporters will benefit from a centralized call center line in the following ways:

- Uniform processing of child abuse/neglect referrals by trained intake workers.
- Consistent use of screening protocols at intake to help determine an appropriate response priority assignment for each referral.
- Improve ability of field workers to focus on assessment, case planning and other field work.
- Ability to promulgate and implement policy and procedure changes affecting intake in a uniform and timely manner.
- Uniform recording of referral calls.
- 24/7 live coverage available statewide.
- Facilitate alternative reporting modalities such as web-based reporting.
- Demonstrate statewide, uniform compliance on the federal Child and Family Service Review (CFSR) and Performance Improvement Plans (PIP).
- Provide a single telephone number for all reporters.
- Allow the State and counties the ability to monitor for quality assurance and performance improvement.
- Ensure objectivity and reduction of bias.
- Create a model that would not restrict the type of administrative model used by the individual county.

**Information Used to Reach This Recommendation:** The Committee reviewed research done by Casey Family Programs and from other states including Texas, Arizona, Hawaii, Missouri, Montana and Washington. The Committee made direct contact with individuals from Texas and New York. Articles relating to the reporting of child abuse by clinicians from the American Academy of Pediatrics were reviewed. Personal experience and knowledge by Committee members was shared.

**Legislation/Rule/Budget Decision Item:** A budget decision item is required to secure funding to support this recommendation.

The Department shall promulgate rules establishing the centralized call center and processes used by the call center.

## **15. Accountability Mechanisms (Office of Child Advocate)**

**Background Information:** The State of Colorado does not have an Office of Child Advocate (Office) tasked with the responsibility to review community concerns, gather factual information and, if appropriate, conduct an impartial case review in an attempt to resolve the issues and provide advisory recommendations to the Department. If proffered, State and/or county departments would be expected to respond to the recommendations and present in writing what actions will be or won't be taken as a result of the review from the Office. The Office of Child Advocate would also be tasked to educate the public about who should report potential child maltreatment and the roles they play in their communities to keep children safe and to strengthen families.

**Purpose:** To provide families, mandatory reporters, state and county employees, other professionals who work with children and families and concerned citizens an alternative place to voice their concerns about the response to children in the child welfare system without fear of reprisals.

**Recommendation:** To better coordinate complaints and concerns regarding the provision of child protective services: 1) An Office of Child Advocate shall be established and the Governor shall make a decision as to where to place this Office. The Committee recommends placing this Office in the Colorado Department of Human Services but outside the Division of Child Welfare. 2) The development of a standard grievance policy utilized consistently statewide. The current statutory grievance policy will be amended and any duplicative statutes will be repealed. The grievance policy must be transparent, accessible, monitored and utilized. 3) The existing accountability mechanisms should be reviewed with the purpose of evaluating their effectiveness. The expectation is that the analysis of existing mechanisms will result in streamlining and potential elimination or statutory repeal of some of these mechanisms.

### **Expected Outcomes:**

- Enhance the accountability and transparency of the child welfare system in Colorado.
- Enhance the safety and well-being of children.
- Enhance public confidence in the child welfare system.
- Provide a voice for system change and resources.
- Provide sufficient staff in the Office of Child Advocate to review complaints, conduct inquiries, work closely with the State and county departments and issue reports on individual case recommendations.
- The Office of Child Advocate would have full access to all records including but not limited to those of the Department.

- An Advisory Committee of the Office of Child Advocate will be established consisting of representatives from the State, county departments and other relevant organizations who could contribute to the advancement of the work of the Office.
- The Office of Child Advocate shall promote best practices, evidence-based programs and advocate for the resources needed to provide quality services.
- The Office of Child Advocate shall issue an annual report identifying systemic strengths and challenges, recommending appropriate policy, statutory and funding strategies needed.

**Information Used to Reach This Recommendation:** The Committee heard presentations by staff from the American Bar Association, the Minnesota Department of Human Services, the Missouri Office of the Child Advocate and the Center on Children and the Law. The Committee also reviewed reports from the Rocky Mountain Children’s Law Center, the Adams County Department of Social Services and the Department of Human Services Administrative Review Division.

**Legislation/Rule/Budget Decision Item:** Legislation is required to establish the Office of the Child Advocate and to appropriate funding for the Office as well as to repeal any duplicative statutes.

## **16. Improve Child Welfare Data Quality and Evaluate Practice**

**Background Information:** It is essential to collect accurate data on race and ethnicity of the children in the child welfare system to allow for analysis of disproportionality and disparity issues in the state. Currently, the Colorado Department of Human Services does not have an established data collection capability to address these issues. National trends reflect African American and Native American children being the most over-represented in the child welfare system. The Hispanic population can be either under or over-represented depending on the reporting county.

**Purpose:** To collect and report consistent information related to client ethnicity in a manner that allows county departments and the state to address issues of ethnic disproportionality and disparity for children and families.

**Recommendation:** The Department will evaluate expansion of the current statewide automated reporting system (TRAILS) capacity and related data collection policies to gather additional information to identify the race and ethnicity of Colorado children and families. This data will be mandatory and collected at the point of referral and continue at designated points throughout the life of the case including, but not limited to, assessment. Ethnicity data will be collected at referral, at assessment and will be confirmed when a case is opened. A method for reporting and evaluating county specific and aggregate data using TRAILS will be developed.

### **Expected Outcomes:**

- Data will provide clarity and specifics on ethnic disparity and disproportionality throughout Colorado.
- Data will inform and identify how decisions, practice and service delivery are affected by ethnic disparity and disproportionality.
- Increase favorable outcomes for children.

**Information Used to Reach This Recommendation:** The Committee enlisted the assistance of various groups that are utilizing data to raise awareness regarding disparity and evaluate their initiatives, including presentations from the Colorado Department of Human Services, Colorado Social Services Directors Association, Denver County Department of Human Services, Jefferson County Department of Human Services, Adams County Department of Social Services, Texas Department of Family and Protective Services, Casey Family Programs and the Annie E. Casey Foundation.

**Legislation/Rule/Budget Decision Item:** A budget decision item is required to secure funding for the changes to TRAILS.

The Department shall promulgate rules to define the criteria for data collection and subsequent evaluation.

## 17. Differential Response

**Background Information:** Current screening practice treats all reports of alleged child maltreatment in the same manner. Because current practice is viewed as being adversarial there is limited voluntary engagement with families resulting in a cooperative assessment and intervention process. A caseworker assigned to investigate a report must decide if the allegations of child maltreatment can be substantiated and whether to open the case for services. Early alternative intervention to prevent future incident is often not pursued. There is no statutory or regulatory requirement that investigative and subsequent alternative decision making occur; yet it is routinely performed by county departments.

**Purpose:** Encourage families to participate in programs that provide skills to responsibly protect their children. Provide training to county staff on alternatives to traditional approaches to understand and respond to the underlying causative factors in all cases. Promote expedited delivery of services to families and vulnerable children.

**Recommendation:** The Colorado Department of Human Services (Department) will create and develop a differential response pilot program in no fewer than 6 counties. Counties participating in the pilot program will offer child protection services based on the severity of allegations, repeated reports of child maltreatment in the same family or child(ren) and, the willingness of families to participate in voluntary services. The differential response may be to conduct a traditional assessment and investigation, or to engage the family to participate in select, voluntary services.

After 2 years, the pilot program will be subject to an independent evaluation to determine the effectiveness of the program. If the evaluation data warrants, the pilot program may expand statewide in 5 years. The Department will provide training to casework staff on the different methods of responding to allegations of child maltreatment and make the necessary changes to the TRAILS database.

### **Expected Outcomes:**

- Fewer repeated reports of abuse.
- More families served in the child protection system.
- Fewer cases of child maltreatment will require the full assessment of cases.
- Increased integration and collaboration among community service providers.
- More thorough and comprehensive assessments.
- Over time, cost savings.
- Higher levels of satisfaction among caseworkers and families.



**Information Used to Reach This Recommendation:** The Committee reviewed the data of the level of services available to children when not placed in out of home care, and the data on the number of subsequent reports identifying these same children and their families. The experience of small Colorado counties and other states that have implemented differential response was considered. The Committee also researched various national studies on differential response.

**Legislation/Rule/Budget Decision Item:** Legislation is required to establish and provide funding for a differential response pilot program and an independent evaluation.

The Department shall promulgate rules to define the criteria that will be used in defining the parameters of the program.

## **18. In-Service Training for Child Welfare Caseworkers, Supervisors, Case Aides and Child Abuse/Neglect Hotline Staff**

**Background Information:** Training has been proven to be a significant factor in the reduction of county staff turnover. Stability of the workforce is essential, as the professional relationships formed by child welfare workers with children and families is the cornerstone for the work needed in order to make informed decisions in the best interests of a child. Regionalizing the training will ensure that best practices are utilized consistently throughout the state

**Purpose:** The goal of in-service training is to deliver competency-based, family-centered training that provides the participants with the knowledge, skills, attitudes and behaviors to ensure the permanency, safety and well-being for children and their families.

**Recommendation:** The Department will expand, create and provide ongoing in-service training for child welfare caseworkers, supervisors, case aides and child abuse/neglect hotline staff. The training will be provided annually on a statewide basis. The Department will also develop a selection of other acceptable training sources which may be used to meet the ongoing training requirements.

At a minimum training should include:

- Caseworkers, 40 hours annually.
- Supervisors, 40 hours annually.
- Case Aides, 16 hours annually.
- Child Abuse/Neglect Hotline Staff, 16 hours annually.

### **Expected Outcomes:**

- Uniform interpretation, integration and implementation of federal and state statutes, federal and state regulations and generally accepted best practice standards.
- The training will be focused on knowledge, skills and abilities that workers need in order to provide quality services to children and their families.
- Delivering the training on a regional basis will assure county workers are able to attend.

**Information Used to Reach This Recommendation:** Research of national studies and an investigation of how other states are responding to the educational needs of employees were conducted. The number of hours of required in-service training ranged from 27 to 110. In addition, the Committee conducted a survey of Colorado counties and reviewed job descriptions submitted by the counties.

**Legislation/Rule/Budget Decision Item:** Legislation is required to establish training requirements and appropriate funding to increase existing training for caseworkers and supervisors as well as to develop in-service training for case aides and child abuse/neglect hotline staff.

The Department shall promulgate rules to set minimum qualifications for in-service training.

## **19. Use of a Family Centered Engagement Method**

**Background Information:** There is a need to increase the active participation of families in the child welfare system when children are removed from and returned home. The involvement of family assures preservation of cultural identity and kinship placements.

**Purpose:** Promote family involvement and kinship placements in culturally appropriate case planning for children involved in the child welfare system.

**Recommendation:** Involve the child's family in decision-making processes using a method that:

- Provides facilitated family meetings.
- Documents the involvement of the family in the process.
- Is used at various times throughout the life of a case, such as, but not limited to, at case open, at placement, placement moves and return home.
- Addresses placement options.
- Addresses the cultural needs of the family.

### **Expected Outcomes:**

- Reduce the barriers to increase kinship placements.
- Shorten the length of stay in out of home placements.
- Expedite reunifications.
- Maintain children in their community, school, faith based and extracurricular activities.
- Provide culturally appropriate treatment planning for children and families.
- Reduce the number of moves for children in out of home placements.
- Increase the comfort and well-being of children.

**Information Used to Reach This Recommendation:** The Committee reviewed the Colorado Department of Human Services Rules and Regulations, Volume 7, Colorado Revised Statutes, Title 19 – Children's Code and Public Law 110-351. The Committee also listened to presentations on the Texas model, the Hampton, Virginia model as well as testimony from child protection workers.

**Legislation/Rule/Budget Decision Item:** A budget decision item is required to secure funding to support this recommendation.

The Department shall promulgate rules requiring counties to identify the family engagement method used. The rule will require that treatment plans be provided to families in their native language. The Department will also investigate adding this method to the Core Services Program.

## **20. Access to Services**

**Background Information:** Child welfare services are inconsistent throughout the state including the availability of services to all families, provision of services to promote safe reunification of children with their families, inconsistency in the State's achievement of permanency for children and a lack of independent living services. Smaller county departments often do not have the resources to provide a full range of services and families must travel outside the county to access services. The Department is unable to ensure consistency of services provided throughout the 64 counties as required in Volume 7 of the Department's rules and regulations.

**Purpose:** To promote consistent delivery of services in all 64 county departments statewide.

**Recommendation:** In an effort to promote consistent child welfare services throughout the state, the Department shall establish protocols whereby both the county departments and the State assume accountability to ensure children and families are receiving consistent child welfare services. The allocation of child welfare funding to the county departments shall include a provision that counties agree to accountability protocols and assessment as a condition of receiving the funds.

### **Expected Outcomes:**

- Consistent provision of services across county departments.
- Improve safety, permanency and well-being for children involved in the child welfare system.
- Promote accountability and transparency through reporting enforcement and support mechanisms.
- Aggregate data may be available to designated entities.

**Information Used to Reach This Recommendation:** The Committee reviewed the Child Maltreatment Fatality Report 2007 issued by the Department, a report from PSI/American Humane and data from the Department Administrative Review Division. Individuals from Pennsylvania and Minnesota were interviewed and the Illinois Service Appeal Rule was reviewed. Personal experience and knowledge of Committee members was shared.

**Legislation/Rule/Budget Decision Item:** Legislation is required to amend the Children's Code to implement accountability measures statewide.

The Department shall promulgate rules to establish protocols for the county departments and the State to assume accountability for consistency of services.

## **21. Establish a Statewide Training Program to Address Concerns Around Cultural Competency**

**Background Information:** The Colorado child welfare system has been unable to consistently respond to the cultural needs of families of color. This inconsistency can have devastating consequences for children and their families. Some counties in Colorado are attempting to address this topic. In order to expand the response statewide and mitigate these concerns, all state and county workers should be required to participate in training to provide cultural competency education as it relates to children and families of color in the child welfare system.

**Purpose:** Promote basic awareness, knowledge and a skill set related to cultural competency of workers providing services to families of children in the child welfare system.

**Recommendation:** The Department will ensure that all child welfare training curricula address cultural competency issues and will evaluate the training for effectiveness.

### **Expected Outcomes:**

- Increase the cultural competency service provision for all state and county staff.
- Families and children will receive services from staff trained in culturally responsive practices.
- Modifications will be made to the training curricula based on the evaluation of training effectiveness.
- Increase in customer satisfaction.

**Information Used to Reach This Recommendation:** The Committee reviewed information from subject matter experts and data presentations.

**Legislation/Rule/Budget Decision Item:** Not applicable.

The following recommendations are listed in no specific order of priority:

## **22. Child Welfare System of Care**

**Background Information:** Access to services is inequitable and fragmented among public and private service agencies in Colorado. The Colorado child welfare system does not mandate quality assurance efforts. Outcomes for children and families in the system are not consistent. Families are not always included in the assessment and planning for the services they receive. Services are not consistently available throughout Colorado. Consequently, children are placed in homes outside their communities and often in institutions that do not meet their treatment or permanency planning needs. Because children and families are not getting appropriate services locally, children are staying in the system longer than necessary. This results in poor safety outcomes, inadequate permanency planning and high rates of recidivism.

In the state of Colorado, mental health, child welfare and juvenile justice systems operate separately and children are often shuffled from one program to another without consistency. HB04-1451 encouraged counties to establish a collaborative system among public and private sectors to provide consistent, conjoined services to families and children. Despite legislative efforts, children in many communities do not receive services because the definition of who is responsible to serve a client is vague and program services continue to overlap.

**Purpose:** To ensure services provided through the public welfare system are designed to improve the safety, permanency and well-being of children and are provided consistently across Colorado.

**Recommendation:** Colorado should create a child welfare system that incorporates and implements the 10 following principles:

1. Family's preservation and strength.
2. Child safety.
3. Least restrictive and most appropriate service provision.
4. Accurate child service assessments.
5. Accurate identification for early intervention.
6. Single, collaborative, community-based service provision.
7. New services are created when unmet needs of children and families are identified.
8. Ensure flexibility and require accountability at the local level.
9. Encourage public and private partnerships.
10. Increase interagency collaboration and family involvement.

The programs provided in the child welfare system will be child-centered, family focused, culturally proficient and community or regionally based.

**Expected Outcomes:**

- Decrease rates of recidivism through thoughtful, collaborative efforts that ensure appropriate assessment and services are provided to children in the system.
- Increase rates of reunification of children and their families.
- Decrease lengths of stay in out of home care.
- Reduce the use of higher cost systems.
- Increase permanent placements with relatives.
- Decrease the number of child maltreatment reports in institutions.
- Address disparities for families and children of color.
- Increase access to local services.
- Increase reports of satisfaction by families and community stakeholders in services provided and received.
- Enhance the capacity of counties to provide culturally and linguistically competent services.
- Increase blended and braided funding for child welfare services.
- Enhance local flexibility and accountability.
- Increase collaboration and partnerships among agencies and providers.
- Increase funds for local efforts directed toward prevention and early intervention.

**Information Used to Reach This Recommendation:** The Committee reviewed HB04-1451, documents from the National Child Welfare Resource Center for Organizational Improvement and resources from the National Association of Public Child Welfare Administrators (NAPCWA). The Committee also listened to a presentation given by staff from Hampton, Virginia.

**Legislation/Rule/Budget Decision Item:** The Department shall promulgate rules to define the criteria that will be used in defining the parameters for enhanced and consistent programs for child welfare services.



### **23. Increase the Number of Kinship Care Homes and Culturally Appropriate Foster Homes**

**Background Information:** There is a need to preserve the cultural identity and promote the best interests of children and families in the child welfare system by increasing the use of kinship placements and culturally appropriate foster homes.

**Purpose:** Increase the number of culturally appropriate out of home placements for children in foster homes.

**Recommendation:** To recruit and train culturally appropriate foster homes by:

- Review and assess current foster parent training curriculum to ensure cultural competency is included.
- Require cultural sensitivity training for caseworkers and child placement agency placement workers.
- Encourage counties to share foster care resources, utilize kinship placements whenever possible and recruit families of color to become foster parents.
- Develop recruitment strategies to increase the number of culturally diverse foster homes.
- Require the use of the Child Support Enforcement mechanisms to locate absent parents to further assist in identifying kinship placement resources for children.

#### **Expected Outcomes:**

- Kinship and foster parents will provide an environment to promote cultural identity.
- Reduce the number of moves for children and decrease the length of stay in out of home placements.
- Increase the cultural connections and well-being of children.
- Increase placement resources.
- Increase retention of foster homes.

**Information Used to Reach This Recommendation:** The Committee reviewed the Colorado Department of Human Services Rules and Regulations, Volume 7, Colorado Revised Statutes, Title 19 – Children’s Code and Public Law 110-351. The Committee also listened to presentations on the Texas model, the Hampton, Virginia model as well as testimony from child protection workers.

**Legislation/Rule/Budget Decision Item:** A budget decision item is required to secure funding to support this recommendation.

The Department shall promulgate rules requiring county foster care coordinators and child placement agency workers to attend cultural competency training.

## **24. Feedback to Mandatory Reporters of Child Abuse/Neglect**

**Background Information:** Colorado law provides that certain persons known as mandatory reporters must make a report to the county human services department or local law enforcement agency if there is reasonable cause to know or suspect that a child has been subjected to abuse/neglect or has observed a child being subjected to circumstances or conditions that would reasonably result in abuse/neglect. Certain mandatory reporters have expressed concern that they have made reports, but they were not made aware of the actions taken. These reporters typically have an ongoing relationship with the child and/or family, such that it might be productive for them to have such feedback. These reporters further believe that they could provide useful service to the child and the family as well as contribute to the child's protection if they had some information concerning the action taken based upon their report.

**Purpose:** To provide specific feedback to mandatory reporters of child abuse/neglect.

**Recommendation:** County departments who receive a referral would provide specific feedback to certain mandatory reporters within a prescribed timeframe. The mandatory reporter would not be required to make a formal request for the information and would not have a right to appeal the Department's actions concerning the referral.

### **Expected Outcomes:**

- County departments will provide specific information regarding a referral to the following mandatory reporters:
  1. Hospitals
  2. Behavioral health organizations
  3. Managed service organizations
  4. Referring physicians
  5. Dentists
  6. Psychologists or psychotherapists
  7. Licensed professional counselor or marriage and family therapist
  8. School
  9. Social worker or worker in any facility or agency that is licensed or certified pursuant to part 1 of article 6 of title 26, C.R.S.
  10. Probation Officer
- The information given to mandatory reporters is strictly confidential and shall not be disclosed to any other person.

- Within 30 days of receiving the report, the initial response from the county to the mandatory reporter shall include:
  1. Victim's name.
  2. Identification of any person who may pose a safety risk or safety concern to the child.
  3. Whether the case is closed.
  4. Whether the county department has made an investigation of the case and has not taken any further action.
  5. Whether the victim was returned to the victim's home.
  6. Whether the victim was placed in care outside the victim's home, and the type of placement.
  7. A brief description of any safety plan and/or treatment plan that has been developed by the county department, including information concerning other agencies, if any, who will be providing services under the plan.
  8. The caseworker's name and telephone number.
  9. The date the report is prepared.
  10. Notice that if the mandatory reporter requires additional information he/she may request such information within 90 days of the date the report is prepared. The notice will provide the procedure for requesting the information, as well as the contact information for doing so.
  11. Notice and a contact telephone number so that the mandatory reporter can obtain information whether the family's case remains open with the agency, if such information is needed for case management or treatment purposes.
- The mandatory reporter's authority to request a review of the agency's actions is limited to the conflict resolution process provided by C.R.S. 19-3-211.
- The mandatory reporter has no authority to give input into decision making, unless requested by the agency to do so.

**Information Used to Reach This Recommendation:** The Committee reviewed the statutes of Colorado as well as eight other states including Alabama, Indiana, Minnesota, New Mexico, North Carolina, Ohio, Utah and Virginia.

**Legislation/Rule/Budget Decision Item:** Legislation is required to provide specific information to mandatory reporters. This requirement will have a moderate fiscal impact on county agencies.

The Department shall promulgate rules to outline how and what information can be provided to mandatory reporters.

## 25. Corrective Action Plans and Sanctions

**Background Information:** The Department has statutory responsibility to provide supervision to the county departments. This responsibility includes ensuring that the county departments comply with requirements provided by state statute, the State Board of Human Services, Executive Director rules, federal laws and regulations and contract and grant terms. However, neither rule nor statute specifically addresses how the Department validates compliance with such requirements or what remedies can be taken to enforce compliance.

Specifically, with regard to child welfare, the State has no comprehensive system to correlate the results of the Administrative Review Division's findings with those of the Division of Child Welfare, or to measure performance of individual counties with the goal of ongoing quality improvement. Without analysis of the data collected by various oversight entities, there is no structured approach to the examination of effective practice, necessary training or needed improvements. It is difficult, if not impossible, to identify the reason for substandard performance. The assumption is that there are insufficient resources and the way to fix the system is to increase the resources by hiring more staff, placing more children or doing more investigations. As a consequence, the data that are generated tend to emphasize the failures and not the successes achieved.

**Purpose:** To establish a process for assuring that any findings of rule violations incurred by county departments through reviews completed by the Department are reported to the county in a timely manner. Counties are given the opportunity to review the findings and have the opportunity for rebuttal should they not agree. Once agreement is reached, county departments are compelled to develop and implement corrective measures. The Department is empowered to take necessary steps against county departments that fail to come into compliance.

Specifically, the Department will establish a process for assessing quality service delivery provided by county departments by establishing performance measurements that are based upon activities directed at achieving at a minimum, outcomes of safety, permanency and the well-being of children and families.

**Recommendation:** The State Board of Human Services will promulgate provisions for a Corrective Action Process in Volume 1 as outlined in Attachment C.

The Department will request the State Board of Human Services to amend Volume 7 to tie the Performance Improvement Process related to the federal standards, at a minimum, to the Corrective Action Plan Process in Volume 1.

### **Expected Outcomes:**

- Improve safety, permanency and well-being for children involved in the child welfare system.
- Improve compliance with federal and state requirements.
- Improve fiscal performance and accountability.

**Information Used to Reach This Recommendation:** The Committee reviewed the Colorado Department of Human Services Rules and Regulations, Volumes 5 and 7 as well as the Department Corrective Action Handbook. Data on the quality assurance practices in other states, including Oregon was also reviewed.

**Legislation/Rule/Budget Decision Item:** The Department shall promulgate rules to amend both Volume I and Volume 7.

## 26. Change of Venue

**Background Information:** Practices regarding a change of venue in the courts are not implemented consistently throughout the state. Delay in the transfer of court records impedes the court's ability to docket cases and monitor the provision of services. When venue changes from one jurisdiction to another, children and families often experience lengthy gaps in the provision of services or in some circumstances, a lack of continuity of services due to a lack of available resources in the venue to which a case is transferred.

**Purpose:** To ensure consistency in the provision of child welfare services during a change of venue in the courts.

**Recommendation:** Amend Colorado Revised Statute § 19-3-201(3) to set forth a specific time (30 days) by which all documents and reports must be sent to the receiving court and a specific time by which a status conference/review hearing must be held (15 days from receipt of documents by the court) when venue has transferred from one jurisdiction to another. The court of original jurisdiction shall keep the case open until the first hearing and confirmation of a change in venue by the receiving court.

**Expected Outcomes:**

- Improve the safety, permanency and well-being of children whose cases are transferred from one jurisdiction to another.
- Children and families will experience more continuity in the provision of services when venue is transferred from one jurisdiction to another.
- Improve implementation of service plans.

**Information Used to Reach This Recommendation:** Personal experience and knowledge by Committee members was shared.

**Legislation/Rule/Budget Decision Item:** Legislation is required to amend Colorado Revised Statute § 19-3-201(3).

The Department shall promulgate rules to require the timely transfer of records from one county department to another.

## **27. Recruitment of Faith Based Resource Families**

**Background Information:** It is an ongoing challenge to recruit and retain foster and adoptive parents throughout the state. Public and private partnerships within local communities of faith can greatly increase the number of foster and adoptive parents in a community.

**Purpose:** To promote faith based community outreach to recruit, train and retain foster and adoptive parents.

**Recommendation:** The Department will expand partnerships with local communities of faith in order to increase foster and adoptive care recruitment and retention.

### **Expected Outcomes:**

- Each county department shall establish a goal, if needed, to recruit foster and adoptive parents.
- The Statewide Strategic Use Fund Committee shall make faith-based foster and adoptive care a funding priority.
- If approved, a copy of this recommendation shall be provided to all Statewide Strategic Use Fund grantees.
- The Department shall provide training for faith-based foster and adoptive care recruitment.

**Information Used to Reach This Recommendation:** The Committee consulted with various communities of faith, the Denver Department of Human Services CASA as well as numerous county directors throughout the state. Personal experience and knowledge by Committee members was shared.

**Legislation/Rule/Budget Decision Item:** A budget decision item may be required to secure funding to support training for faith-base foster and adoptive care.

## 28. Child Welfare Quality Assurance Program

**Background Information:** The Child Maltreatment Fatality Report (2007), and the subsequent September 2007 State Auditors reports, identified that state oversight and supervision are areas needing to be improved. The Department currently has over 20 assessment mechanisms in place conducted by various Divisions and Units that are not adequately coordinated for evaluating and enhancing the child welfare system of practice/care for the betterment of children and families.

**Purpose:** To provide oversight of the child welfare system that promotes accountability, positive outcomes, and a state compliance mechanism, when needed, for the betterment of children and families. The State Department has oversight of the counties, which requires objectivity and the ability to establish and enforce standards. This independence is currently evident in the State Department's practices, such as the Child and Family Service Review (CFSR) monitoring, child fatality reviews, ARD reviews, various audits and other oversight activities.

**Recommendation:** The Department will establish an Office of Quality Improvement and Assurance (OQIA) within the Department of Human Services that includes but is not limited to the following responsibilities:

- Data analysis, trend analysis and performance analysis for each administrative unit delivering services directly to families and children using standards of performance that are uniformly applied to all counties.
- Data are made available to county commissioners or the governing entity for county child welfare departments.
- Improve transparency in the OQIA in partnership with counties and other stakeholders that will determine outcome measures, performance measures and reporting methods.
- Results of the OQIA will be used by the State and county departments to develop a performance improvement plan both for individual county departments and statewide.
- County departments that fail to improve their performance will be subjected to corrective actions and/or sanctions.
- The State will develop a random sampling of performance audits to ensure that every county in the state has a performance review conducted no less than annually and that county departments who are identified to be out of compliance are subject to field review of performance on a quarterly basis.
- Coordinate with other quality improvement and assurance efforts within the Department related to child welfare services defined in CSR 26-5-101 (3).



**Expected Outcomes:**

- Improve Colorado's performance on the federal Child and Family Service Review Program Improvement Plan.
- Advance best practices and evidence-informed programs.
- Increase county departments' accountability regarding child welfare program performance.
- Enhance and ensure a mechanism for reviewing and resolving child welfare complaints.
- OQIA shall coordinate with the ARD Quality Assurance Program and other quality assurance endeavors operating at the state and county levels to identify roles, avoid duplications and identify gaps and opportunities to work collaboratively toward the best interests of children.

**Information Used to Reach This Recommendation:** Review of the current system in Colorado, other state systems, written reports and practitioners in the field of child welfare.

**Legislation/Rule/Budget Decision Item:** The Department shall promulgate rules to change and/or establish increased functional coordination of state oversight activities and county accountability.

## **29. Organizational Structure for Delivering Child Welfare and Other Human Services in Colorado**

**Background Information:** The public social service system in Colorado is "state supervised and county administered". Both the State and county human service departments provide vital services to children and families in need. County departments provide direct services and the State provides supervision and oversight to the county departments. This dual system creates challenges in assuring that there is consistency across counties in decision making, supervision, and training in county departments. Consistency refers to the successful provision of social services that results in the positive outcomes for children and family. It is this same system, however, that allows each individual county to tailor assistance specifically to meet the needs of their community.

With the assistance of organizational studies conducted by Policy Studies, Inc. and the American Humane Association, the Committee discovered a wide variance in the child welfare services families and children received, depending on where the family lived. Other challenges were revealed, for example, the span of supervision for the Department is too large, with 64 separate entities to be supervised. A more manageable system can be achieved by reducing the number of entities to whom the State provides supervision. Counties were not consistently using available tools to help provide information for decision making and case planning. Performance data were difficult to interpret due to variability of county practice and small sample sizes across some counties. Though the sample size was more significant in larger counties, current review methods did not reach the totality of child welfare activity.

**Purpose:** To determine the most effective state-county organizational capacity and structure to protect children.

**Recommendation:** Hybrid Structure for Human Services Delivery System

The State of Colorado should adopt a state-supervised, regionally directed, and regionally and locally implemented system for the delivery of social services.

Child Welfare services cannot be isolated from the many other services provided under the supervision of the Department. This recommendation, therefore, contemplates that all social services programs under the auspices of the Department will be included in the regional structure that is recommended here.

The hybrid structure includes two new types of entities for delivery of social services programs: State Regional Offices (SRO) and County Regional Offices (CRO). As the names imply, an SRO is staffed and directed by Department personnel, and a CRO is staffed by county personnel, but operates under the supervision of the Department pursuant to a memorandum of understanding. Further details concerning both entities are included below.

State Regional Offices (SRO) will be established by the Department to implement the regional social services structure. A Regional Director, hired under the state personnel system, would head regional offices. Staff of the Regional Offices would

be employees of the State. The Department will establish "satellite" offices within regions to address geographic distances and/or geological barriers.

- Subject to further fiscal analysis, counties within an SRO shall be required to contribute funds equal to 5% of the base year funding (for which the counties currently contribute a 20% county share), operated under the auspices of the Department. The county would retain existing Social Services Fund Balance.
- Should an SRO overspend its allocation, the county departments are held only to the 5% match. Any federal penalties will be charged to the State.

Any county with a child and adolescent population of 30,000 or more may elect to become a County Regional Office. Upon implementation of this hybrid structure any of the counties listed below may elect to become a CRO.

- As of the date of this report, the following counties qualify for the opportunity to elect CRO designation:
  1. Adams
  2. Arapahoe
  3. Boulder
  4. Denver
  5. Douglas
  6. El Paso
  7. Jefferson
  8. Larimer
  9. Mesa
  10. Pueblo
  11. Weld
- A CRO operates under the supervision of the Department.
- Subject to further fiscal analysis, county departments in a CRO operate pursuant to a Memorandum of Understanding (MOU) provided each county department contributes an estimate of 25% of the total funding for which the county currently contributes approximately a 20% county share.
  1. Counties who select this option may have to raise the county mill levy.
  2. The county department's funding contribution would remain unchanged during the period that the county is seeking to raise the mill levy (if required). The mill levy increase process must be successfully completed within two years after declaring its intention to elect to operate as a CRO.
  3. For county departments making good faith efforts, but experiencing difficulty in raising the necessary funding, the Department, at its

discretion, may choose to extend additional time for raising funding through a waiver process. During this time, county departments need to comply with performance requirements set forth below.

- The CRO must adopt a regional/satellite office structure similar to the SRO that is being implemented by the Department.
- Every CRO must achieve specified outcomes and comply with all policies, rules and regulations of the Department and is subject to sanctions as provided in Volume 1 of the Department's rules for failure to comply.
- In addition to supervision by the Department, the Department will provide CROs with technical assistance, training, peer consultation, culturally sensitive practices and management tools to ensure effective and timely delivery of social services and the achievement of specified outcomes. CROs will also participate in the decision-making process regarding statutory, rule and policy changes.
- A county that had elected to be a CRO may decide to become an SRO through an appropriate transition process. Such a decision will be permanent, and the county will be treated as or incorporated into a region, operated under the auspices of the Department.
- The Department may assume the administration of the social services program of any CRO that fails to achieve accepted performance outcomes. Before assuming management, the Department will follow rules for corrective action found in Volume 1 of the Department's Rules and/or established through the MOU.
- For counties not identified as eligible to operate as a CRO or an eligible county who chooses not to operate as a CRO, the Department shall adopt a regional social services structure administered by state employees (SRO).
- Should a CRO overspend its allocation, it is 100% county funds. Any federal penalties will be charged to the CRO.

Leaders of both CRO and SRO programs will meet at least quarterly with Department program directors to discuss the following:

- Initial meetings: Develop Strategic Plan to be presented to Governor's Office
- Subsequent meetings: Review and monitor Strategic Plan
  1. CRO responsibilities.
  2. SRO responsibilities.
  3. Department responsibilities.
  4. Accountability measures.
  5. Resource planning for all areas of the state.

Every SRO and CRO must participate in best practices as determined by the Department, such as:

- Differential Response (if statewide pilots are sustainable).
- Facilitated family engagement strategies.
- Identified system of care model.
- Collaborative Care Management (guidelines and definitions to be developed, to reflect principles now found in HB04-1451).

Every CRO and SRO must be in compliance with performance measures prescribed by federal, state and county requirements of the specific program.

The Executive Director of the Department would establish a State-level advisory committee comprised of the SRO Directors, CRO Directors, representatives of local governments, stakeholders and consumers of social services to advise the Executive Director on policies and practices for the delivery of social services programs in Colorado.

Each SRO and CRO will establish a Regional Advisory Council (RAC) comprised of representatives of local government(s), stakeholders and consumers of social services. The Council serves in an advisory role to the Regional Director and as a vehicle for coordination and collaboration of expertise and services within the region. Local representatives and stakeholders outlined below shall enter into MOUs that are designed to promote a collaborative system of local level interagency collaborative groups to coordinate and managed provision of services for children and families.

- Representatives and Stakeholders should include, but not be limited to:
  1. Local governments
  2. Local judicial districts, including probation services
  3. Health Department, whether a county, district or regional health department
  4. Local school districts
  5. Community mental health centers
  6. Mental health assessment and service agencies
  7. Substance abuse programs
  8. Family violence programs
  9. Developmental disabilities programs
  10. Division of Youth Corrections
  11. Faith Based Representative
  12. Parent (formerly involved with the Child Welfare System)
  13. Former Foster Child

14. Law Enforcement
15. Medical and dental representatives
16. Private Providers

- The Memorandum of Understanding must address:
  1. Risk-sharing
  2. Resource-pooling
  3. Performance measures
  4. Monitoring
  5. Staff-training
  6. Retained funds
- Each Memorandum of Understanding must achieve the following goals:
  1. Safety, permanence and well-being of children and families;
  2. Reduce duplication and eliminate fragmentation of services provided to children or families;
  3. Increase the quality, appropriateness and effectiveness of services delivered to children and families to achieve better outcomes for these children and families;
  4. Encourage cost-sharing among service providers;
  5. Economic self-sufficiency;
  6. Adult independence;
  7. Culturally proficient practice.

Each SRO and CRO will be funded by a pool of funds established by the State including State and federal funds, cash funds, and the appropriate county contributions.

- Distribution of funds will be according to a methodology determined by a planning group during the planning year. The planning group will also make recommendations regarding ongoing allocation processes to include representatives from CROs and appropriate stakeholders.
- Each SRO and CRO that achieves its performance outcomes will be entitled to retain general/local funds not used in a fiscal year. Such retained funds will be used as determined by the RAC, but must be spent on the provision of human services to the public.
- Each SRO and CRO as provided in the MOU shall retain any additional funds secured with local efforts or collaboration. Local governments may invest more in social services than is provided by state funding consistent within the policies, rules, regulations and practices of the Department.

Following is a suggested timeline for the implementation of the hybrid model:

- December 2009 – Legislative Process Group (LPG)
  1. Identify possible rule changes needed to implement the recommendations outlined above.
  2. Outline legislation necessary to implement recommendations.
  3. Identify sponsors for legislation.
- January 2010 – Introduce legislation.
  1. Legislation shall provide for an advisory group and a process for the development, further planning and implementation of the proposed social services system structure. The process shall include at a minimum the issues listed below.
  2. Issues:
    - (a) Appropriate designation of regions.
    - (b) Review of funding.
    - (c) Authority of the State.
    - (d) Expected outcomes.
    - (e) Identify stakeholders who represent a cross section similar to the composition of the Child Welfare Action Committee.
    - (f) One-year planning period and one-year implementation phase to regions.
    - (g) Include all social service programs in the delivery model developed.
    - (h) Address the migration of employees from individual county merit systems to a State merit system.
    - (i) Analyze if adjudicated juvenile delinquents and the safety of the community are best served in the child welfare system.
    - (j) Analyze if children with developmental disabilities who do not have allegations of abuse/neglect are best served in the child welfare system.
    - (k) Analyze the fiscal analysis restructuring the social services system.
    - (l) Evaluation.

**Recommendation: Organizational Operating Principles**

The Committee recommends adoption of the following recommendations that were presented by Policy Studies, Inc. and the American Humane Association in their "Organization Assessment and Recommendations for Improvement for the Colorado Division of Child Welfare, Final Report" dated February 19, 2009.

- Recommendation 2: Fully staff the Division with responsibilities assigned to positions based upon functions.
- Recommendation 3: Establish clear operational boundaries.
- Recommendation 4: Articulate and model leadership culture.
- Recommendation 5: Establish value proposition of the Division to the counties.
- Recommendation 6: Establish outcomes-based performance measurement program.
- Recommendation 7: Develop formal communications and feedback protocol.
- Recommendation 8: Conduct and communicate formal strategic plan.
- Recommendation 9: Initiate change management program.

**Recommendation: Practices and Processes**

The Committee recommends adoption of the following recommendations that were presented by Policy Studies, Inc. and the American Humane Association in their “Child Welfare Organizational Structure and Capacity Analysis Project” report presented June 30, 2009.

- Recommendation 1: Balance consistency with responsiveness to local needs and resources.
- Recommendation 2: Provide specific service and practice models for use by the SROs and CROs.
- Recommendation 3: Emphasize threats to child safety along with risk assessment and family assessment.
- Recommendation 4: Invest in client points of entry.
- Recommendation 5: Make data a decision driver.

**Recommendation: Evaluation**

The State of Colorado and the Executive Director of the Colorado Department of Human Services shall develop a plan to evaluate the implementation of all of the recommendations made by the Governor’s Child Welfare Action Committee including evaluating the process to develop the recommendations.

**Expected Outcomes:**

- Establish a system of care and practices to ensure effective and timely delivery of social services and the achievement of specified outcomes.
- Provide regional and community teams and local governments with technical assistance, training, peer consultation, culturally sensitive practices and management tools.



- Identify policy, program and fiscal issues facing regional and community teams and local governments; collaborate with policy experts from other state agencies to connect regional and community teams with resources and to facilitate communication and problem solving on policy and program implementation issues.
- Deploy state resources and coordinate effective exchange of programs and expertise among and between regions and counties.
- Form inter-agency partnerships.
- Coordinate with local governments.
- Facilitate communications between the State's SRO and CRO regions and communities, and from the regions and communities to State.

**Information Used to Reach This Recommendation:**

- Child Welfare Organizational Structure and Capacity Analysis Project, Policy Studies Inc. and American Humane, June 30, 2009.
- HB-1451 Subgroup Recommendation, May 27, 2009.
- Human Services Restructuring Proposal, Barbara Drake, Director of Douglas County Human Services, June 23, 2009.
- Administrative Structure Recommendation, John Faught, February 27, 2009, revised April 14, 2009.
- Hybrid Approach, Lynda Fox, July 21, 2009.
- Issue Briefing, Linda Fairbairn, July 2009.
- Organization Assessment and Recommendations for Improvement for the Colorado Division of Child Welfare, Final Report, Policy Studies Inc. and American Humane, February 19, 2009.
- Child Welfare Action Committee Interim Report to the Governor, October 2008.
- Report of a Reconnaissance Management Study of the Department of Social Services, December 1, 1988.
- Hampton Virginia Presentation.
- Larimer County, Regional State Offices in Partnership with County Administered Child Welfare.

**Legislative/Rule/Budget Decision Item:** Legislation is necessary to adopt these structural changes. Legislation shall provide for a planning period as well as an implementation period. It should also designate the persons to be involved in the planning and implementation in both decision-making and advisory capacities.

The planning group designated in the proposed legislation will establish the number of SROs that will exist in the state according to the most effective delivery of services

for children and families. When creating the SROs, the planning group is urged not to divide judicial districts and will consult with other agencies when determining the appropriate characteristics of regions.



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**Bill Ritter, Jr.**  
Governor

**B 006 08**

## **EXECUTIVE ORDER**

### **Creating the Governor's Child Welfare Action Committee**

Pursuant to the authority vested in the Office of the Governor of the State of Colorado, I, Bill Ritter, Jr., Governor of the State of Colorado, hereby issue this Executive Order creating the Governor's Child Welfare Action Committee ("Committee").

#### **I. Background and Purpose**

The protection of children from abuse and neglect must be one of Colorado's highest public policy priorities. It is our responsibility to assure that Colorado's youngest citizens have the opportunity to be safe and nurtured and to achieve their full potential. If even one child dies due to neglect or abuse it is one too many. We must commit ourselves to continually improving our child welfare system, assuring that efforts are made to better assess and serve this at risk population of children and their families.

To put our care of vulnerable children in context, it is important to look at the numbers of families that are currently involved in the child welfare system:

- In 2007 the child welfare system received 70,216 referrals for abuse and neglect;
- Of those, 57,545 cases were opened for assessment; and
- Of those assessed, 41,536 cases were opened by the county departments for full review.

A spike in the number of child fatalities statewide led to the Colorado Department of Human Services' recent review of child fatalities due to child abuse or neglect. This review identified several ways in which Colorado's child welfare system can be improved. My administration is taking steps to immediately implement many of these necessary improvements. This review also identified issues that will involve longer term planning and solutions.

The protection of children in Colorado is the responsibility of many parties including parents, relatives, neighbors, foster parents, schools, law enforcement, courts, providers,

guardians *ad litem*, and many other organizations within each of Colorado's communities. In Colorado we have a public social service system that is "state supervised and county administered." This means that both the state and county departments of human services provide vital services to children and families in need. The county departments directly provide the services that aid children and families everyday. The State department provides the supervision and oversight to the counties as they administer the child welfare programs. This dual system creates challenges in assuring that there is consistency across counties in decision making, supervision, and training in human service offices. It is this same system, however, that allows each individual county to specifically tailor assistance to meet the needs of their community.

It is urgent that we examine the State's child welfare system so that we can better protect children from abuse and neglect. We also need to enhance the public confidence in the child welfare system. The system must be more transparent in order to provide assurance to the public that when they have concerns about a child's well being and they report these concerns to authorities that the situation will be responded to in a timely manner by highly trained professionals.

## II. Mission and Scope

The mission of the Governor's Child Welfare Action Committee shall be to provide recommendations to the Governor on how to improve the Colorado Child Welfare System. The Committee must be guided by data and must rely upon evidence of best practices when available. The ultimate goal will be to reduce the neglect, injury, and fatality rates for Colorado's children. I am establishing this Committee for eighteen months. It is expected that the committee will make policy, budgetary, and legislative recommendations.

The Committee's work shall include, but not be limited to:

- A. Analyzing state-county organizational capacity and structure to determine whether this system is the most effective option for protecting children:
  1. Define the role of the Colorado Department of Human Services in monitoring, oversight, consultation, and technical assistance with child welfare staff in county departments of social/human services;
  2. Consider an array of progressive incentives and sanctions to be utilized with county departments and providers to assure they are in compliance with legal rules and regulations;
  3. Assess county workload, caseload and staffing levels to determine what level of resources are required to ensure the safety of children; and

4. Investigate child welfare models throughout the country and whether there are other organizational structures that would better ensure the safety of Colorado's children.
- B. Examining the quality and quantity of training that child care professionals should receive when working in the child protection field:
1. Define basic qualifications and training requirements for staff and supervisors who are part of the state-county funded child welfare system;
  2. Consider the benefits of a worker certification program for child welfare workers and supervisors; and
  3. Consider the efficacy, cost and benefits of a State Training Academy for Child Protection.
- C. Evaluating public access to state-county human services departments:
1. Assess how human services agencies can be more accessible and responsive to community members who want to report child maltreatment; and
  2. Make recommendations for systems, protocols, and programming that allow the public to make reports more easily and to develop a tracking system in which citizens can be assured that their concerns will be followed up in a responsible and timely manner.
- D. Exploring the role that independent oversight committees can play in ensuring that human service agencies are held accountable for actions that might negatively impact families, children, and the community at large:
1. Evaluate the effectiveness of agencies like the Child Ombudsman Office in which an independent body is authorized to intervene when an agency's action or inaction may be placing a child at risk;
- E. Developing recommendations as to how public/private partnerships can improve the services and care provided to children who reside within the welfare system:
1. Develop forums that encourage state agencies and divisions to collaborate across systems to improve child welfare resources and practice. These departments should include but be not limited to the Colorado Department of Public Health and Environment and

the Colorado Department of Health Care Policy and Financing, as well as the Judicial Branch; and

2. Include business partners from the private sector who serve families in a wide array of programs. These individuals should bring expertise on how to change and improve business practices by incorporating effective management skills and efficiency methodologies.
- F. Reviewing evidence-based best practice standards to the extent practicable when recommending changes to the child welfare system.

### III. Membership

The Committee shall be composed, as follows:

- A. The Committee shall consist of up to twenty-five (25) voting members who shall be appointed by and serve at the pleasure of the Governor.
- B. The following individuals shall serve as members of the Committee:
  1. The Executive Director of the Department of Human Services, who shall serve as chair of the Committee;
  2. The Executive Director of the Department of Public Health and Environment, or his designee; and
  3. The Executive Director of the Department of Health Care Policy and Financing, or her designee;
- C. Other members of the Committee shall include:
  1. County commissioners and county social services representatives;
  2. Individuals with judicial experience;
  3. Individuals with experience in early childhood development and/or K-12 educational representatives;
  4. Children's representatives serving in a private or non-profit entity dedicated to the protection of children;
  5. Families or children who are current and/or former recipients of child welfare services in Colorado; and

6. Members from the business community who bring management and business planning experience.
- D. The Committee shall be appointed to assure broad-based regional, ethnic, and professional distribution of membership.
- E. The Committee shall meet regularly at the direction and discretion of the chair.
- F. The Committee may establish working groups or subcommittees from within its membership or outside its membership to assist it in its work or to address specific issues.

#### IV. Directives

The Governor's Child Welfare Action Committee is hereby created. The Committee shall prepare and submit to the Governor an interim and a final report. The interim report shall be submitted by October 31, 2008, and a final report shall be submitted by December 31, 2009. In its interim report, the Committee shall report on its progress and, to the extent that any recommendations are finalized, make its recommendations regarding any policy changes, including but not limited to recommendations for legislative changes. In its final report, the Committee shall make its final recommendations regarding any policy changes, including but not limited to recommendations for legislative changes. The Committee shall make every effort to reach consensus on its interim and final reports. Recommendations contained in the Committee's reports shall only be adopted upon a two-thirds vote of the Committee members.

#### V. Staffing and Resources

The Committee shall have the power to accept money and in-kind contributions from public and private entities, but only to the extent such donations are necessary to cover its expenses. These donated funds may be used for the purpose of providing administrative support for the Committee, which may include retaining a consultant to assist with the Committee's work, as well as paying for the Committee's actual expenses. Any money contributed to the Committee shall be directed to the Office of the Governor and deposited with the Treasurer of the State of Colorado in an account within the Office of the Governor's budget. Members of the Committee shall serve without compensation, but may, at the discretion of the co-chairs and upon the approval of the Office of the Governor, be reimbursed for any actual expenses incurred.

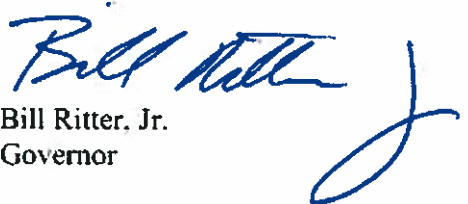


VI. Duration

This Executive Order shall remain in force until December 31, 2009, at which time the Committee shall be dissolved.



GIVEN under my hand and the  
Executive Seal of the State of  
Colorado this sixteenth day of  
April, 2008.

  
Bill Ritter, Jr.  
Governor



Attachment B

**Governor's Child Welfare Action Committee  
Recommendation Matrix  
September 28, 2009**

	Recommendation Title	Legislation	Rule	Budget Decision Item
14.	Centralized Call Center		X	X
15.	Accountability Mechanisms (Office of Child Advocate)	X		
16.	Improve Child Welfare Data Quality and Evaluate Practice		X	X
17.	Differential Response	X	X	
18.	In-Service Training for Child Welfare Caseworkers, Supervisors, Case Aides and Child Abuse/Neglect Hotline Staff	X	X	
19.	Use of a Family Centered Engagement Method		X	X
20.	Access to Services	X	X	
21.	Establish a Statewide Training Program to Address Concerns Around Cultural Competency			
22.	Child Welfare System of Care		X	
23.	Increase the Number of Kinship Care Homes and Culturally Appropriate Foster Homes		X	X
24.	Feedback to Mandatory Reporters of Child Abuse/Neglect	X	X	

Attachment B

**Governor's Child Welfare Action Committee  
Recommendation Matrix  
September 28, 2009**

25.	Corrective Action Plans and Sanctions			X	
26.	Change of Venue	X		X	
27.	Recruitment of Faith Based Resource Families				X
28.	Child Welfare Quality Assurance Program			X	
29.	Organizational Structure for Delivering Child Welfare and Other Human Services in Colorado	X			

DEPARTMENT OF HUMAN SERVICES  
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### 1.100 CORRECTIVE ACTION PROCESS FOR THE COLORADO DEPARTMENT OF HUMAN SERVICES

#### 1.101 PROGRAM DEFINITION

The corrective action process provided in this Volume 1 applies to all programs and services under the supervision of the Department of Human Services. The corrective action process is intended to be a collaborative process between the State and the county departments of human/social services to ensure that county departments achieve compliance with applicable statutes, regulations and rules within specified time frames. Identification of issues of noncompliance can occur through reviews and monitoring with the county department, routine monitoring by State staff or through specially scheduled Program or Management Reviews.

#### 1.102 AUTHORITY

Colorado Revised Statutes, 26-1-111.

#### 1.103 DEFINITIONS

The following are definitions of commonly used terms in this Volume 1:

- A. "Corrective Action Plan (CAP)" means a written plan to correct areas of noncompliance that clearly identifies the areas of noncompliance, action steps to be taken for each area, dates by which action steps are to be implemented, indicators of progress towards compliance, outcome measures for identifying compliance, dates for progress reports and a date for achieving compliance.
- B. "CAP Form" means the state designed format to be used by the county to submit a written correction action plan, as may be required.
- C. "Disallowance" means to prohibit funds paid retrospective to the date the ineligibility or noncompliance occurred, or such later date as determined by the State Department.
- D. "Noncompliance" means not meeting requirements provided by State statute, State Department of Human Services Board rules, Executive Director rules, Federal laws or regulations or contract and grant terms.
- E. "Sanction" means an action taken by the State Department pursuant to a written order of the Executive Director upon a confirmed finding that a county department has not met the requirements of a Corrective Action Plan approved in accordance with this Volume 1. Sanctions may include, as determined by the State Department, one or more of the actions provided in this Volume 1 pursuant to Colorado Human Services Code, 26-1-109, CRS, 1973.

#### 1.104 STATE DEPARTMENT OBJECTIVES

The State Department objectives in implementing the corrective action process are:

- A. Improve service delivery to clients;
- B. Ensure fiscal accountability; and
- C. Strengthen the management and supervision capabilities of the State Department and the county departments.



## Attachment C

### 1.105 CORRECTIVE ACTION PROCES COMPONENTS

The components of the corrective action process are:

- A. Scheduling of audit/review
- B. Entrance conference
- C. Audit or review
- D. Presentation of preliminary findings
- E. County Department response
- F. Follow up conference
- G. Final Report
- H. Corrective Action Plan submittal and approval
- I. Corrective Action Plan monitoring

#### 1.105.1 SCHEDULE THE AUDIT/REVIEW

State staff shall notify the County Director, Board of County Commissioners and other executive local officials, in writing of a scheduled audit/review. Notification should be provided in a manner that allows the county department sufficient time to prepare, but shall not occur any closer than 2 weeks prior to the audit/review. The notification shall provide guidance as to information and resources required for the audit/review.

If the county department has scheduling conflicts that would preclude its staff from being able to participate in the audit/review, it must immediately notify the State staff coordinating the review in order to establish a new audit/review date.

#### 1.105.2 ENTRANCE CONFERENCE

State staff shall schedule an entrance interview with the County Director and/or staff selected by the County Director. State staff shall notify the Board of County Commissioners and other executive local officials, in writing of the scheduled entrance interview. The purpose of the entrance interview is to introduce the staff, explain the reason for the audit/review, review the schedule/process, establish procedure for gathering additional information/documentation during the review, review the tools used to monitor and evaluate compliance with the standards and answer any questions.

#### 1.105.3 AUDIT/REVIEW

The audit/review will be planned to minimize disruption to the normal activities of the county department. This component includes the on-site review and data collection. The county department will provide access to staff and records required to achieve audit/review objectives. Discrepancies identified during the audit/review shall be discussed with county staff to determine if all relevant data has been considered.

#### 1.105.4 PRESENTATION OF PRELIMINARY FINDINGS

Upon completion of the on-site monitoring activities, the State staff will, within 20 working days of the completion of the audit/review, draft a Preliminary Report and provide a copy of the report to the county department. The Preliminary Report shall include the audit/review findings based on the review instrument or tool(s) used. If a county department is found to be in noncompliance in any area, such area shall be specifically identified in the preliminary report.

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### 1.105.5 COUNTY DEPARTMENT RESPONSE

The county department shall, within 20 working days of the date the Preliminary Report was mailed, respond in writing to State staff. The response should include information regarding agreement or disagreement with the findings, any identified areas of non-compliance, requirements for CAP's, or any objection to specific wording. The County's response shall be addressed during the follow up conference.

If the County Department does not respond in writing within 20 working days of the date the Preliminary Report was mailed, the Preliminary Report shall be considered the Final Report.

### 1.105.6 FOLLOW UP CONFERENCE

State staff, within 20 working days of the date the county department mailed its response, shall schedule a follow up conference with the county department in order to discuss the Preliminary Report and the county department's response. State staff shall notify the Board of County Commissions and other executive local officials, in writing of the scheduled follow up conference. The following, at a minimum, shall be invited to participate in the follow up conference by the State staff responsible for the audit/review: the County Director and/or their designees, State Department Program Staff with responsibility for any rules reviewed, State staff who conducted the review, and Field Administration.

### 1.105.7 FINAL REPORT

Within 20 working days of the follow up conference, State staff shall prepare a Final Report and provide a copy of the report to the county department and the Board of County Commissioners or other executive local officials.

### 1.105.8 COUNTY DEPARTMENT APPEAL

Within 20 working days of the date the Final Report was mailed, the County Director may appeal the findings of the Final Report by the Executive Director of the State Department of Human Services. The County's appeal shall identify the specific findings disputed and provide statements and data or other evidence to support the appeal. The Executive Director of the State Department of Human Services, or her/his designee, shall respond in writing to the County Department within 30 working days of the date the appeal letter was mailed. The Executive Director's response also shall be mailed to the Board of County Commissioners and other executive local officials. All decisions by the Executive Director or their designee shall be considered the final decision of the Department.

If the Final Report required the county department to complete a CAP, the timeline for submitting the CAP does not begin until after the appeal has been heard and formal notification of the Executive Director's response has been mailed to the county department.

### 1.105.9 CORRECTIVE ACTION PLAN SUBMITTAL AND APPROVAL

Upon receiving the Final report, and if the report requires the submittal of a Corrective Action Plan, the county department shall prepare and return a Corrective Action Plan to the State Department within 20 working days of the date the Final Report was mailed. If the county department filed a formal appeal to the Executive Director of the Department Human Services that was denied, the CAP must be submitted within 20 working days of the date the formal notice of denial was mailed.

## Attachment C

The written CAP shall be completed on the CAP Form provided by the State Department staff and shall identify the areas of noncompliance, action steps to be taken for each area, dates by which action steps are to be implemented, indicators of progress towards compliance, outcome measures for identifying compliance, dates for progress reports and a date for achieving compliance.

The State Department has 20 working days from the date the county mailed the CAP to notify the county department of approval or denial of the CAP and request modifications deemed necessary.

If a county department chooses not to submit a Corrective Action Plan within the 20 working days, the State Department may impose sanctions as defined herein.

If the county department needs additional time to meet any of the deadlines provided in this Volume 1, the county director may submit a request in writing to the Department, providing the reasons that an extension of time is necessary and a proposed date for the submittal of required document or plan. The Department will respond to the request for an extension within five working days of the date the request was received by the Department. If the request for an extension is denied, the required document or plan shall be due within five working days of the date the denial was mailed to the county department.

If the county department needs to modify a Corrective Action Plan, the county director may submit a request in writing to the Department, providing the reasons that a modification is necessary and a proposed date for the submittal of a revised Corrective Action Plan. The Department will respond to the request for modification within five working days of the date the Department received the request. If the request for a modification is denied, the Corrective Action Plan shall remain as previously approved. If approved, the county will be required to submit a modified CAP Form to the Department by the proposed date. If the county does not submit the revised CAP Form within the timeline approved, the original CAP will continue to be in force.

### 1.105.10 CORRECTIVE ACTION PLAN MONITORING

Monitoring of the Corrective Action Plan shall begin within 20 working days following State approval of the plan and continues through the completion of the plan. Monitoring may include, but not be limited to, case and record reviews, onsite conferences, staff interviews, data analysis, and direct observation. At any time during the monitoring process, but no later than the agreed end of the Corrective Action Plan timeframe, the state department shall notify the county department the status of final compliance. If compliance has been achieved, written notification shall be provided to the County Director, Board of County Commissioners and other executive local officials. If the county department remains in noncompliance, sanctions may be imposed upon written notification to the County Director, Board of County Commissioners and other executive local officials.

### 1.105.11 COLLABORATION

The corrective action process is intended to be a collaborative process through which the State Department and the county departments work cooperatively to resolve challenges and problems to achieve compliance with statutes, regulations and rules. To that end the State Department will advise the county departments as to resources and other means available to assist in achieving compliance.

## Attachment C

### 1.105.12 SANCTIONS

If a county department does not meet the requirements of this Volume 1 or fails to comply with an approved Corrective Action Plan, the State Department may impose Sanctions as provided in this Volume 1.

- a. Disallowance of State funds for reimbursement of the salary of the County Director of Human/Social Services;
- b. The State Department to undertake the administration the public assistance or welfare program for which the county department has not met the requirements of a Corrective Action Plan: and
- c. Any other action which may be necessary or desirable for carrying out the provisions of the Colorado Human Services Code, 26-1-101, et seq., CRS 1973.

Notwithstanding the provisions of this Volume 1, if the circumstances of Noncompliance, as defined herein, creates or has the potential to create a risk of imminent harm to a person or damage to property, the State Department may take action, as it deems appropriate, consistent with Colorado Human Services Code, 26-1-101, et seq., CRS 1973.

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