

November 11, 1996

Members of the Human Services Interim Committee
State Capitol Bldg
Salt Lake City UT 84114

Subject: A Review of the Bureau of Services Review (Report #96-09)

Dear Legislators:

As required by **Utah Code** (62A-4a-118) we have completed our review of the Bureau of Services Review (BSR) within the Department of Human Services. Utah's child welfare system has been subject to much public interest and legislative reform. As part of that reform effort, the Legislature established the Bureau of Services Review within the Department of Human Services to monitor compliance with legislative and legal mandates. Our office conducted a previous audit of BSR (Report #95-07). In our prior review we found that BSR was doing a good job of monitoring the Division of Child and Family Services (DCFS) but was not specifically reporting on how well the system was protecting children from abuse or neglect and preserving families. In this audit, the Legislature wanted us to not only report on BSR's performance but also on whether the state's child welfare system is improving. Our current audit found that BSR is accurately reporting compliance in most cases with requirements of the David C. et al. v. Leavitt lawsuit settlement agreement, current legislation, and DCFS policy. BSR has also incorporated performance aspects into their review as recommended in our previous audit. However, we note areas where BSR's ratings need more definitions and clarifications. Finally, we found that some child welfare system outcome measures have shown improvement since our 1993 audit of that system (Report #93-06).

BSR was established to monitor compliance with legislative, policy and legal requirements in the state's child welfare system. To accomplish this monitoring function, BSR reviews a random selection of cases from the system. BSR has developed a review instrument which is based on the Child Welfare Reform Act, the division's policies and procedures and the David C. et al. v. Leavitt lawsuit settlement agreement. The settlement agreement is a legal agreement between the state of Utah and the National Center for Youth Law. In this agreement, the state agrees to adhere to a number of requirements. To test how well DCFS

caseworkers are following legislation, policy, and the settlement agreement, BSR reviews selected case files and rates how well the workers comply with the requirements. In addition, as recommended in our previous audit, BSR also rates the overall performance of the caseworker in such areas as protecting the child and providing the child a permanent family situation on a timely basis. BSR has issued two reports on its findings in these areas.

In order to test how effectively BSR is monitoring the child welfare system, we reviewed a sample of BSR cases. As explained in more detail below, all disagreements encountered in our review were reviewed twice by members of our staff, discussed with a second BSR reviewer, and discussed again by our staff prior to being recorded as a disagreement. In addition, we also conducted a detailed follow-up of how well the recommendations from our 1993 child welfare audit have been implemented.

BSR Appears to Effectively Monitor Compliance

Our evaluation of BSR's 1996 review concluded that BSR appears to be effective in monitoring most cases for compliance with child welfare requirements by DCFS. To make this conclusion, we evaluated BSR's methodology for developing their review instruments (assessment questionnaires), for selecting the cases to be reviewed and for rating cases. We found that BSR's methodology for developing the assessment questionnaire and selecting cases appears sound. In addition, we found that BSR accurately applied assessment questionnaires to case file information.

Methodology Used by BSR to Review Cases Appears Sound

The assessment questionnaires used by BSR cover the main points of legislation, policy and procedure and the settlement agreement. Requirements contained in these documents are quite extensive. It would be impractical for BSR to attempt to monitor compliance with every requirement contained in these documents. Nevertheless, we believe BSR has included the most important compliance issues from each document in their assessment questionnaire. In addition, we consulted an expert in statistical methodology who reported that the sampling methodology used by BSR to select cases for review appeared to be sound and statistically valid. Lastly, our independent review of case files for compliance with requirements of the settlement agreement, Legislation, and DCFS policy concluded that BSR is correctly applying their assessment questionnaires to the information contained in DCFS case files.

BSR's Assessment Questionnaires Appear to Cover Compliance Requirements. The assessment questionnaires used by BSR to review case files appear to cover the major compliance requirements contained in the settlement agreement, current Legislation, and DCFS policy. Each of these documents contain numerous procedural requirements which must be adhered to by DCFS caseworkers in the areas of foster care and child protective services (CPS). The assessment questionnaires measure compliance with eight requirements in "Unaccepted" referrals; 31 requirements in the "Intake" process; 15 preliminary requirements in the "Investigation" process and up to 62 requirements if the allegations are substantiated; and 175 requirements in "Foster Care."

Many requirements contained in the settlement agreement, legislation, and DCFS policy overlap. For example, both the settlement agreement and DCFS policy require that a child removed from a home by the state receive a comprehensive medical assessment within 30 days. However, a number of other requirements contained in these documents do not overlap. Many requirements are unique to each document. Because the number of requirements contained in these documents is so great, it would be practically impossible (or at least inefficient) for BSR to devise an assessment questionnaire to cover every requirement. In our opinion, BSR has done an acceptable job of covering most of the requirements contained in each document. The following figure illustrates a few of the requirements covered in BSR's assessment questionnaires.

Figure I
Examples of Compliance Requirements Monitored by BSR

BSR Assessment Question: CPS	Requirement Source
Was the investigation initiated (child seen) within the appropriate time frame?	Settlement Agreement IA.1 DHS-DCFS policy 202 B.1.i
If the Child was not seen within the appropriate time frame, was the regional director informed in writing?	Settlement Agreement IA.1 DHS-DCFS policy 202 B.1.i.4
Did the CPS worker conduct a face-to-face interview with the child outside of the presence of the alleged perpetrator?	Settlement Agreement IA.4 DHS-DCFS policy 202 C.1.c
Did the CPS worker make an unannounced home visit to address allegations and observe home conditions?	DHS-DCFS policy 202 C.1.c.4
Was an interdisciplinary team meeting convened within 24 hours of the child being taken into protective custody?	Utah Code 62A-4a-202.3 DHS-DCFS policy 202 E.5.a.b
BSR Assessment Questions: Foster Care	Requirement Source
Did the agency ensure that the following hearings were held: 6 month review hearing; 12 month review hearing?	Utah Code 78-3a-311(2)(c) DHS-DCFS policy 313 .1.d & e
Was the child placed in a licensed placement?	Settlement Agreement IV A.8 DHS-DCFS policy 303 .1.a.2
Were the child's health care, treatments, and follow-ups provided according to the schedule recommended by the child's health care professionals?	Settlement Agreement V A.6.e
When the permanency goal is adoption, does the treatment plan include specific steps for termination of parental rights?	Settlement Agreement VIII A.4
After the child's initial month in care, did the worker visit the child at least twice per month with at least one of these visits being in the child's out-of-home placement?	Settlement Agreement IV A.13 DHS-DCFS policy 312(1)(n)(3)

BSR's Methodology for Selecting Cases is Reasonable. The method used by BSR to select cases for review is statistically reliable. BSR reported conducting 661 reviews on 454 cases in their 1996 review. Categorization of the cases reviewed were as follows: 207 CPS intake reviews, 207 CPS investigation reviews, 47 unable to locate reviews, 103 unaccepted referral reviews, and 97 foster care cases. (97 cases were reviewed in foster care and 357 cases were reviewed in CPS. 207 of the 357 CPS cases were reviewed for compliance in both intake

and investigation, which explains how 661 reviews were conducted on 454 cases). According to BSR officials, cases chosen for review were determined by random selection. Each month a specified number of cases were selected using a computerized random number program. The cases selected were then reviewed by members of BSR for compliance with legal, legislative, and policy requirements over an 8-month period. (BSR's review period started in September 1995 and ran through April 1996). In order to evaluate BSR's review, it should be noted that DCFS reported investigating a total of 16,114 CPS cases during 1995 and that 2,118 foster care cases were open at year's end. This means BSR conducted a review of 2.2 percent of the total CPS cases and 4.6 percent of the foster care cases open during the year.

In order to determine whether BSR's methodology for reviewing cases was sound, we interviewed several specialists in statistical sampling. We contacted a specialist from the Department of Health. This individual indicated that BSR's reporting of compliance and performance results is statistically valid. In addition, we contacted a professor from Brigham Young University who is a specialist in statistical sampling methodology. He indicated that the method used by BSR to select cases for review appeared to be statistically reliable, meaning the data was gathered in a way as to produce valid results.

BSR Accurately Applies Assessment Questionnaires to Most Case Files

In addition to having a sound methodology, BSR reviewers accurately apply the assessment questionnaires to the case file information. Overall, we found a high level of agreement between our review and BSR's 1996 review with respect to the requirements of the settlement agreement, current legislation, and DCFS policy covered in BSR's assessment questionnaires. In foster care, we agreed with BSR's assessment 92 percent of the time (8 percent disagreement). In CPS, we agreed with BSR's assessment 94 percent of the time (6 percent disagreement). BSR's assessment questionnaires are written to review caseworker compliance in Foster Care and CPS investigations, Intake, Unable to Locate, and Intake-Unaccepted referrals. In order to determine the accuracy of BSR's review in these areas, we selected a statistically valid random sample of case files reviewed by BSR during the year. Case files selected in our random sample were then reviewed by members of our audit team for compliance. Case files were selected from each area, with the exception of unable to locate files. In total we reviewed 134 case files. (A total of 3,174 compliance questions were reviewed). After completing our review, we compared our answers with those of BSR to measure the level of agreement. We found a high level of agreement in most cases, concluding that BSR reviewers interpret information in the case file correctly and score assessment questionnaires appropriately.

Whenever a disagreement was found with BSR's review, the case was reviewed again by another member of our audit team. All disagreements received at least two reviews. We then asked a member of BSR (other than the original reviewer) to look at the case. If the second BSR reviewer agreed with our position, the case was counted as a disagreement. If the second BSR reviewer disagreed with our position, the case was discussed again by the audit team and a decision was made whether to accept or reject BSR's position. Lastly, in order to document the accuracy of the information contained in BSR's files, we visited a number of field offices and compared the documentation contained in the original case file with the documentation contained in BSR's file. We found no significant differences between the documentation in the original file and the documentation in BSR's files.

Figure II shows the number of disagreements with BSR recorded in our review. Column I identifies each review category. Column II shows the total number of questions we reviewed in each category. Column III lists the number of disagreements recorded in each category. And, Column IV calculates the percentage of disagreement in each category.

Figure II			
Evaluation of BSR's 1996 Compliance Review			
Type of Evaluation	Total Questions	Number of Disagreement with BSR Evaluation	Percent of Disagreement
Foster Care	1,169	92	8%
CPS			
CPS Intake	1,170	77	7
CPS Unaccepted	295	12	4
CPS Investigation	<u>540</u>	<u>36</u>	<u>7</u>
CPS Total	2,005	125	6%

As noted above, there were a few instances where we disagreed with BSR's compliance review; however, for the most part, our response agreed with BSR's response. It should be noted that most of the disagreements we had with BSR were not substantive but relatively minor disagreements consisting primarily of differences in interpreting and scoring information. As shown above, we disagreed with BSR in 6 percent of the CPS compliance requirements reviewed and 8 percent of the foster care compliance requirements reviewed. Of the 125

disagreements in CPS, 6 were deemed to be significant disagreements. Of the 92 disagreements in foster care, 1 was deemed to be a significant disagreement. A significant disagreement was defined as noncompliance with a requirement where child safety was in question. If child safety was not an issue, the disagreement was not considered significant. The next paragraph shows a disagreement where we felt child safety was at issue.

The following example of a significant compliance disagreement involves a case where the mother of a 6 year old girl reported that her daughter and two friends had been sexually abused by a pair of teenagers in the neighborhood. The mother reported that the daughter had previously been sexually abused by an older brother, now in foster care, and that the daughter and a younger brother had recently been involved in sexual acts together. She reported witnessing at least one incident between the two siblings. The CPS worker assigned to investigate the case called and talked to the mother over phone. During the conversation, the mother declined to have her daughter interviewed, stating that her daughter had been through enough already. The mother said she was going to take her daughter to a therapist for treatment. The caseworker then discussed the situation with a supervisor who recommended that the alleged perpetrators (teenagers) be interviewed on the chance that they might admit to abusing the girls. During the interview, both teenagers denied the allegations. Based on the results of the interview and the refusal of the mother to allow her daughter to be interviewed, the CPS worker determined the alleged abuse to be unfounded.

Our disagreement in this case is with compliance question number 13 on BSR's assessment questionnaire which reads: "Did the CPS worker complete the case closure form, addressing each allegation in the referral and actions taken (or needed) to address any protection/risk issues?" The BSR reviewer scored this question "Yes" compliance standard met. We disagree. Our disagreement is over the fact that the CPS worker did not address each allegation on the case closure form. The allegation involving sexual abuse between the victim and her younger brother was not investigated by the worker and not addressed on the closure form. In addition, we question whether appropriate actions were taken to address the protection/risk issues involving the victim because the CPS worker failed to conduct a face to face interview regarding the sexual abuse allegation involving the teenagers. As a result, we feel the caseworker could not adequately document whether appropriate actions were taken in this case. We discussed our concern with another BSR reviewer who agreed with our position, indicating that while the case closure form was filled out, the allegations were not properly addressed. In fairness, it should be noted that the original reviewer of this case scored the caseworker's performance as "poor" in each performance category. Excerpts from the reviewer's case report document the reviewer's criticism of the caseworker's performance.

When the mother refused to allow CPS to interview the daughter, CPS took no further action in assessing the daughter's situation. This is problematic for two reasons. First, CPS had information that the daughter was previously abused by her brother who is in foster care. It

was also known that the daughter has, in turn, sexually abused a younger sibling in the home. Given the prior history of sexual abuse in this family, the bureau would expect the agency to be more diligent in obtaining an interview with the daughter. And, although, the mother refused to allow the daughter to be interviewed, the agency and the police should have staffed the case with the Deputy Attorney General to determine if action should be taken to compel the mother to allow the daughter to be interviewed. The second problem with CPS's handling of the case is that when CPS was declined an interview with the daughter, CPS did not make an unannounced home visit to document the conditions of the child and the child's home.

It is unclear why the reviewer indicated that the case closure form had been completed properly, addressing all allegations of abuse, when the reviewer documented such poor performance in the caseworker's investigation of the allegations. However, we again emphasize that this example is an exception. We found very few instances of significant disagreements with BSR's 1996 review of DCFS cases.

BSR Appears to Effectively Monitor Performance

Our evaluation of BSR's 1996 review also concluded that in most cases BSR appears to be effective in monitoring for caseworker performance in achieving the mission of DCFS. BSR's 1996 report indicates that DCFS caseworkers are performing at acceptable levels in most aspects of providing child welfare services. However, BSR did identify areas where caseworkers could improve. Unlike the compliance section, BSR's review of performance is not specifically related to the settlement agreement, legislation, or policy but resulted from our 1995 review of BSR. In that review, we recommended that BSR could improve their review of DCFS by incorporating performance based questions into the assessment questionnaires. We felt that by expanding the review to include a conclusion regarding whether the child was protected, if adequate services were provided to preserve the family, and whether a permanent family was provided for foster children in a timely manner, that BSR's review could be used for more than just scoring compliance/noncompliance. It could also be used as a tool to assist regional managers and supervisors in training caseworkers. We commend BSR for incorporating meaningful performance questions into their assessment questionnaires and identifying areas where improvement is needed. Overall, BSR reported a high level of acceptable performance.

In CPS, the bureau has developed performance indicators to assess a caseworker's ability to gather sufficient information regarding referral allegations, correctly prioritize cases accepted for investigation, provide adequate documentation supporting the decision to accept a case for investigation, take the action necessary to protect the child at risk, assess risk correctly at case closure, provide documentation supporting the decision to substantiate or not substantiate

allegations, and offer adequate and appropriate services to preserve families. In foster care, the bureau has developed performance indicators to assess a caseworker's ability to achieve permanency for a child in a timely manner, ensure that the child is being appropriately served by the agency, and provide adequate and appropriate services to preserve the family.

Overall, BSR reported acceptable performance was achieved by caseworkers in 92 percent or more of the CPS cases reviewed and in 96 percent or more of the foster care cases reviewed. However, BSR did identify areas where performance could be improved. For example, in the intake area, BSR reported that, "Although the majority of intake work was viewed as acceptable, there are workers who could improve the legibility of their work by using a word processor to generate reports". And, in CPS investigations, BSR reported that workers were making accurate assessments of the risk to children in the majority of the cases reviewed, but noted, "There are cases in which a worker may fail to make collateral contacts with family, neighbors, or witnesses to alleged abuse or neglect and may reach a premature conclusion about a case before he has acquired all necessary information to accurately assess risk". BSR had similar recommendations for improvement in most of the performance areas monitored in their 1996 review.

In order to determine the accuracy of BSR's review, we conducted a performance review on the 134 cases selected in our random sample. (A total of 315 performance questions were reviewed). In each case, we made a determination as to whether the caseworker's performance was acceptable or unacceptable in achieving the mission of DCFS. We used BSR's performance assessment questionnaires to evaluate the caseworker in the performance areas listed above. Cases were reviewed in each category, with the exception of unable to locate files. Disagreements were recorded after double readings by our audit staff and by another BSR reviewer. Overall, we found a high level of agreement between our performance review and BSR's performance review. In foster care, we agreed with BSR's assessment 96 percent of the time (4 percent disagreement). In CPS, we agreed with BSR's assessment 92 percent of the time (8 percent disagreement). As in the compliance review, we found BSR reviewers were quite accurate in applying the performance assessment questionnaires to the case file information.

Figure III shows the number of disagreements we recorded in our performance review. Column I identifies each review category. Column II shows the total number of questions we reviewed in each category. Column III lists the number of disagreements recorded in each category. And, Column IV calculates the percentage of disagreement in each category.

Figure III			
Evaluation of BSR's 1996 Performance Review			
Type of Evaluation	Total Questions	Number of Disagreement with BSR Evaluation	Percent of Disagreement
Foster Care	45	2	4%
CPS			
CPS Intake	86	10	12
CPS Unaccepted	40	3	8
CPS Investigation	<u>144</u>	<u>9</u>	<u>6</u>
CPS Total	270	22	8%

The above figure shows that we agreed with BSR's performance assessment in most cases. However, one area with somewhat higher disagreement is in the intake area where we disagreed with BSR's rating in 12 percent of the cases reviewed. It should be noted that most of these disagreements were not significant disagreements. A number of the disagreements in the intake area occurred over the reviewer rating the intake worker's performance as "Fair" when we felt it should have been rated as "Poor". Later in the report we will discuss our concern with BSR's use of "Fair" as a rating to indicate acceptable performance and our recommendation that they consider implementing a rating of "Needs Improvement". If a rating of "Needs Improvement" was currently used by BSR to identify cases where the worker's performance met the minimum standard of acceptability but still needed improvement, a number of our disagreements with performance rating in the intake area and other areas would be eliminated.

BSR Accurately Reports Problems In DCFS

Besides reviewing the case files appropriately, we also found no evidence to suggest that BSR fails to report noncompliance or poor performance by DCFS caseworkers. It is important that BSR accurately identify and report problems discovered during their review in order for DCFS to take appropriate corrective action. The high level of agreement between our review and BSR's review indicates that BSR reviewers are finding the same deficiencies we found. For example, during our review we noted instances of incomplete, sketchy, or missing worker activity logs and other integral documents in CPS. Many times hand-written logs and reports were illegible making it practically impossible to accurately discern the events and

circumstances of the case. In addition, we found a wide variety of different reporting forms being used by workers throughout the state. While some forms were quite useful for collecting and gathering essential information, others were not. Some forms were vague and lacked the detail needed for the worker to properly compile needed information. BSR reported a similar finding in its 1996 compliance review:

BSR identified incomplete documentation of caseworker activities as the single greatest obstacle to the accurate analyzation of services provided to the public by the state child welfare system. The bureau found that case record documentation frequently failed to accurately represent the efforts of caseworkers and other staff in behalf of DCFS clients. Often the problem of incomplete file documentation necessitated that reviewers conduct collateral interviews with clients, caseworkers, supervisors, court personnel, attorneys, substitute care providers, mental health workers, and school staff. In many cases these collateral sources provided independent supporting corroboration of case-management activities.

Our review of foster care case files found some instances where caseworkers failed to meet the requirement of visiting with every foster child twice each month. In a number of cases we noted that required signatures were missing from key documents. Also, practically none of the foster care files we reviewed contained sufficient documentation showing that service plans developed for foster children were distributed according to policy. BSR reported similar procedural problems in its compliance review of foster care case files.

BSR staff found that only a small percentage of caseworkers (34%) are meeting the requirement of two monthly visits with the foster child. There were Service Plan requirements that were bypassed, including missing signatures from caseworkers, supervisors, parents and foster parents and insufficient documentation showing that Service Plans were being distributed to parents, providers, Assistant Attorneys General, Guardians ad Litem and the court...

In addition to accurately reporting system-wide problems in their 1996 review, BSR also documents and reports problems discovered in each case. In the next section, we will discuss how BSR's case reports are used by regional directors to train staff in problem areas. We commend BSR for identifying and accurately reporting problems found in their review of DCFS cases.

DCFS Management is Being Informed of BSR's Findings

After conducting each case file review, BSR writes a case specific report that is sent to each regional director. The case report lists the compliance errors and performance deficiencies identified by the reviewer. In order to determine the effectiveness of BSR's case reports, we

contacted each regional director concerning how the reports are being used in their region. Each regional director indicated that every BSR case report is reviewed with the respective caseworker involved and their supervisor. In addition, region-wide training on problem areas is also developed as a corrective measure. Supervisors from each region were also contacted and they reported identical activities as those reported by the regional directors. This indicates that the corrective process is known and understood by all levels in each region.

The process for taking corrective action is similar among the regions, although it is not identical. The most important element that the regions have in common is the fact that a system is in place for taking corrective actions that is also well known and understood by the staff. In one region we contacted, supervisors are required to discuss deficiencies with caseworkers and a plan is developed for the caseworker to come into compliance with the standards. If there are any pervasive errors then training for the entire region will be organized to correct the problems. This region then reports back to BSR on the corrective measures taken in response to their report. Only one region did not report corrective action back to BSR.

BSR Reviews Can Be Strengthened

In our opinion, some fine-tuning of definitions and methods used in scoring BSR's assessment questionnaires would strengthen the bureau's review. As noted above, we found a few disagreements with BSR's 1996 review of DCFS. However, most disagreements were relatively minor. In the compliance review, most disagreements occurred over the definition and proper use of what constitutes a "Documented Exception" versus a "Not Applicable" response. Better definitions are needed and BSR reviewers need training on when to apply each response. Implementation of these changes will result in more consistency among BSR reviewers. In the performance review, most of our disagreements occurred where the rating did not match the shortcomings documented in the case. We found instances where BSR reviewers documented serious problems with a caseworker's performance, but were hesitant to assign a "Poor" rating. We believe if BSR would develop a rating classification which identifies cases meeting the minimal level of acceptability but needing improvement, their review process would be strengthened. We also found cases that did not technically meet compliance standards, but were still given points for compliance by BSR because of the current method used to score some compliance areas. We think BSR should reconsider the scoring method used in these areas. Lastly, a few case files were discovered missing in DCFS offices and were, therefore, unavailable for BSR to review. We recommend that BSR develop a section in their next review to report missing case files. We also recommend that DCFS review its record keeping system and develop procedures to ensure that case files are not misplaced.

Better Definitions are Needed

BSR's review process would be strengthened if better definitions were developed for some of their scoring indicators. A number of disagreements we had with BSR resulted from inconsistent use of the scoring indicators "Documented Exception" and "Not Applicable". We found some instances where requirements in cases of similar circumstances were scored as a "Documented Exception" by one reviewer and scored as "Not Applicable" by another reviewer. Several of our disagreements with BSR resulted from inconsistency in this area. The problem stems from not having a clear definition of what constitutes a "Documented Exception" and when a requirement is considered "Not Applicable" to the case. Inconsistency between the reviewers in this area translates into inconsistent reporting by BSR. This is because questions scored as "Not Applicable" are not counted in the final scoring tally whereas "Documented Exceptions" are counted. As a result, caseworkers may not be given credit for proper case work in some instances and be credited for doing improper case work in other instances.

One example of a disagreement where a "Not Applicable" rating occurred involves an instance where it was not properly documented if the case was assigned to a CPS investigator according to policy. Because of the lack of documentation, the BSR reviewer scored the question on the assessment form pertaining to whether the case was assigned according to policy as "Not Applicable". We disagree. In our opinion, the assessment form should have been scored as "No" the compliance standard was not met. DCFS policy requires that priority one and two cases must be assigned to an investigator immediately and that priority three cases be assigned within in 24 hours. In our opinion, a lack of documentation does not make this requirement "Not Applicable" to BSR's review. It is the responsibility of the caseworker to adequately document their work and maintain proper records. It is the responsibility of the BSR reviewer to determine whether that documentation satisfies policy requirements. If adequate documentation is not in the file, the requirement should be scored as "No" the compliance standard was not met. We asked a second BSR reviewer to examine this case and they agreed with our position that the question was applicable and that the question should have been scored as "No" the compliance standard was not met.

In our opinion, BSR needs to develop clear definitions including examples of what constitutes a "Documented Exception" and when circumstances make a requirement "Not Applicable" to a case. Without adequate definitions we interpreted a few questions differently than BSR which caused some relatively minor disagreements. We recommend that every member of the BSR's staff receive training in the proper use of these responses.

More Consistent Scoring is Needed

Another concern we identified involves some instances where we believe the BSR reviewer's performance rating did not correspond with problems identified with the caseworker's performance. We found occasions where the BSR reviewer documented significant problems with a case and criticized the caseworker's performance but elected to score the performance as "Fair" or acceptable instead of "Poor" or unacceptable. Under BSR's current procedures, all performance questions receiving scores of "Excellent," "Good," and "Fair" are counted as acceptable performance. Only cases scored as "Poor" are counted as unacceptable performance. In most cases given a "Fair" performance rating, the reviewer found significant problems with the caseworker's performance. However, in cases given "Excellent" or "Good" performance ratings, the reviewer generally praised the caseworker's performance. We disagree that cases with documented shortcoming should receive essentially the same score (acceptable) as cases in which truly good work is performed. We suggest that BSR consider the categories of "Acceptable" "Needs Improvement" and "Unacceptable" in the performance review. The following are examples of cases where we disagree with the reviewer scoring the caseworker's performance as "Fair" instead of "Poor".

The first example of a significant performance disagreement involves an allegation of physical abuse. A friend of the family called in a referral reporting that the victim, a 13 year-old girl, said her mother had been beating her since the girl told her that she was pregnant. The referent said her daughter, a friend of the victim, reported seeing the mother hit the victim in the side of the face. The CPS worker assigned to the case visited the victim at school. During the interview she documented that the victim had a bruise on her cheek which the victim said happened when her mother hit her. The victim also stated that whenever she did something her mother didn't like, her mother would hit her with a fist on the face, bottom, arms, and legs. A few days later, the CPS worker interviewed the mother regarding the allegation of physical abuse. The mother denied hitting her daughter, but did say that she grabbed her hair. Later in the interview, the mother said that the last time she hit her daughter in the face was last Christmas but she had not done it since. Based on these two interviews, the caseworker determined that the allegation of physical abuse was unfounded.

Our disagreement is with all four of BSR's performance assessments on this case. In each assessment, the reviewer documents significant shortcomings in the caseworker's performance. However, instead of rating the caseworker's performance as "Poor" the reviewer chose to rate the performance as "Fair" or acceptable. We disagree. In our opinion, a rating of "Fair" does not adequately reflect the seriousness of the shortcomings in the caseworker's performance. We believe the caseworker did not conduct a thorough investigation of this case. We feel the caseworker could have interviewed neighbors and relatives regarding activities in the home. It is also unclear why the worker chose to accept the mother's denial of physical abuse and disregard the daughter's statements that physical abuse occurred.

BSR's performance assessment questionnaire for CPS investigations evaluates a caseworker's performance in the following areas: (1) Was the risk to the child assessed correctly at closure; (2) Does the worker's documentation support the outcome decision; (3) Was the child protected; and (4) Were adequate and appropriate services provided or offered to preserve the family? Excerpts from the reviewer's report document concerns with the caseworker's performance in these areas.

CPS worker assessed risk at closure as low. Child has behavioral problems. Mother admitted to slapping child in the past and to grabbing child by the hair during recent incident. Mother and child in counseling, but child continues to act out. Past history and current problems suggests risk should have been assessed higher at closure.

Child's statements were inconsistent and, in some instances incredible. Child does not appear to be a credible witness. However, CPS worker never documented an explanation for the bruise on child's face. Reviewer feels allegation of abuse should have been substantiated.

The child does not appear to have been protected to the best of DCFS ability.

Reviewer believes case should have been referred for short-term protective services ordered by the court (PSC) to assist in bringing services into this family.

We agree with the observations of the BSR reviewer in this case. However, we believe the reviewer should have scored the caseworker's performance as "Poor" or unacceptable in each category. It is difficult to justify how the performance rating could be anything but unacceptable in a case that was not substantiated by the caseworker but which the reviewer believes should have been substantiated.

The next example of a significant performance disagreement involves allegations of physical abuse, physical neglect, and medical neglect of an 18 month-old boy. A relative of the family in question called DCFS to report that the mother sleeps in until 1:00 or 2:00 in the afternoon which results in the neglect of the toddler. The referent reported that the little boy was very hungry, eats out of the trash, and that the mother feeds him inappropriate food which he does not like. The referent also stated that the victim was thin, always sick, and that the mother rarely takes him to the doctor. Lastly, the referent said the mother hits the child often, that this was the primary form of discipline. The CPS investigator assigned to the case made an unannounced visit to the home and discovered that the mother was an illegal alien and that there were 12 people (cousins, in-laws, etc.) living in the home. During the interview, the mother denied all allegations. She admitted that she did not have health insurance but claimed that her Medicaid application was pending. The mother signed a release form so the worker could contact the toddler's doctor. A few days later, the caseworker received a call from one of the

individuals living in the home who said she overheard some of the interview with the mother and wanted to correct a few things. She said the mother lied about her pending Medicaid status and that the mother yanks the boy around by the arm and yells constantly. This referent later called back a second time and left a message that she had more information. The caseworker indicates that she contacted the doctor's office and was informed by a co-worker of the doctor that the mother had missed several appointments for the boy in the past. The co-worker said that a home health nurse would be provided to check up on the boy if the mother began missing appointments again. At this point, the caseworker determined that the allegations were unsubstantiated and the case was closed.

Again, our disagreement is with all four performance evaluations. In our opinion, it does not appear that the caseworker did enough to ensure the safety of the child and based on the documentation in the case file, it is unclear whether the child was protected. As in the previous case, the BSR reviewer scored the caseworker's performance in each category as "Fair". We disagree. We believe the performance should have been scored as "Poor" or unacceptable. Also, as in the previous case, the reviewer's report clearly documents the shortcoming of the caseworker's performance. The following excerpts illustrate the reviewer's concerns.

The bureau is concerned that CPS did not cover all the necessary bases with this investigation. Issues noted by the bureau are as follows:

- Although there were allegation of physical abuse, the caseworker did not document if she checked the toddler for bruises or injuries. Although there were allegations of physical neglect involving the toddler's diet, the caseworker did not document if she asked the parent to show her the food available in the home. Although there were allegations of medical neglect, CPS did not assess whether the family had the resources to get the child the necessary medical care.*
- Although there was a witness, the mother's sister-in-law and referent, CPS discounted the referent's information, rather than ask the referent if she, or anyone else, would be willing to testify about the alleged abuse/neglect. Also following the unannounced home visit by CPS, a relative of the mother called CPS and said she was concerned about the child because his mother yanked him around by the arm, and yelled constantly. This same relative subsequently called the caseworker and left a message that more information was available, but the caseworker did not return the call. This information was apparently discounted when the decision was made to close the case as unfounded...*

The issues identified above are very troubling to the bureau. We are concerned that the investigation was too brief, and did not go far enough to investigate the referral allegations and to ensure that the child was protected.

We agree with the concerns voiced by the BSR reviewer in this case. However, we believe the reviewer should have gone one step further and scored the caseworker's performance as "Poor" or unacceptable in each category. It seems inconsistent to score a caseworker's performance as "Fair" or acceptable when there is a definite question as to whether the child was protected and the family received needed services.

In our opinion, BSR reviewers should be less hesitant to assign "Poor" ratings when deficiencies are documented in a caseworker's performance. BSR should also consider replacing the "Fair" rating currently used and develop a more appropriate rating for cases where the caseworker's performance meets the minimum standard of acceptability but clearly needs improvement. A number of our disagreements in the performance area would not have occurred if they were rated as "Needs Improvement" and scored some percentage points less than full credit.

We are also concerned over the inconsistent approach by which BSR scores some questions in their compliance review. With most questions compliance can be measured with a simple yes or no answer. However, some questions review multiple occurrences of an event, such as caseworker home visits to children in foster care, quarterly summary reports, and activity log entries. The inconsistency is that in some cases, these multiple event questions are answered as yes or no (compliance/non-compliance) while in other questions a partial credit scoring technique is used which gives points for accomplishing the event and deducts points when the event is not accomplished. For example, question 21 in the foster care assessment checks to see if a child in foster placement is visited by the caseworker once a week in the foster home during the first month of placement. If four visits in the foster home are not accomplished, the worker is evaluated as being in non-compliance. In one of the cases we reviewed we found that the worker conducted the four visits, but only three were in the foster home. Because this question reflects a simple yes or no the worker was found to be in non-compliance. This approach conflicts with the approach in questions 74 and 78, which are also multiple event questions. Question 74 asks: "*Were quarterly progress summaries completed every 90 days from the date of removal*"; and question 78 asks: "*Were activity logs completed each month.*" BSR scores one point for each quarter a progress summary is completed and one point for each month an activity log is completed. This method of scoring allows caseworkers to receive points when they have not totally complied with the policy requirement. For example, if a caseworker completed three of the four quarterly progress summaries during the year, BSR would give three positive "Yes" scores and one negative "No" score, thus the caseworker would net a positive two "Yes" scores. We believe BSR should develop a scoring system that is consistently applied to requirements where multiple occurrences are involved.

BSR Should Report Missing DCFS Case Files

We documented four instances where cases selected for our audit could not be found in BSR's files. We learned that these cases had not been reviewed by BSR although they were listed as files having been reviewed by BSR during the year. When we brought this to the attention of BSR officials, they reported that there were seven files in total that were selected by BSR for review during the year that could not be located by the DCFS field offices. (It should be emphasized that the missing seven files were not included in BSR's count of 454 cases reviewed.) When asked why the field offices were sending case files directly to reviewers, BSR officials reported that their normal procedure requires reviewers go directly to the field offices and pull the original case file for review. However, during the past year, one of BSR's staff moved to California. Because it was midway through the review year and it would take too much time to properly train another reviewer, BSR elected to retain the reviewer and have files copied by the field office and mailed to her.

We were concerned over the fact that DCFS workers were unsupervised by anyone from BSR when case files were copied and sent to the reviewer in California. Good audit practice requires that a member of the audit team be present when files are selected for review. Allowing DCFS to pull and copy files selected for review without a member of BSR being present increases the chances of files being "cleaned-up" before being sent to the reviewer. BSR officials acknowledge this problem, but point out that it would be very difficult for DCFS workers "clean-up" case files, suggesting that if an attempt were made to alter documents it would likely be discovered in the reviewer's examination of collaborating documents and interviews with individuals involved in the case. Nevertheless, they do not anticipate this being a concern in the future because the reviewer in California has been replaced. We agree that this situation was probably an isolated incident caused by the reviewer moving out of state and do not foresee any future problems in this area.

Lastly, we recommend that BSR report all occurrences of missing files discovered during their review. Missing files are a "red flag" indicator of fraud and abuse. Proper record keeping is essential to maintaining an efficient and effective child welfare system. In our opinion, it is inexcusable for case records to be missing from the system. BSR officials agree and indicated that they will begin reporting missing case files beginning with their 1997 review.

In conclusion, we believe that BSR is effective in monitoring DCFS for compliance with requirements contained in the settlement agreement, current legislation, and DCFS policy. We also believe that BSR is effective in monitoring caseworker performance in achieving the mission of DCFS. We found a few disagreements with BSR in both the compliance and performance ratings. However, most disagreements were not significant in nature. A number of disagreements could be reduced through BSR developing better definitions and explanations

of how reviewers should rate the questions. Also, the scoring should be more representative of what actually happened in the case. Lastly, BSR should also report missing case files in DCFS.

This concludes our evaluation of BSR's 1996 review. In the next section we will examine outcome measures in the state's child welfare system in an attempt to determine whether improvement has been made in the system since our audit in 1993.

System Outcome Measures In DCFS Suggest Improvement has Been Made in Some Areas

Our evaluation of DCFS indicates that significant progress has occurred in implementing the 37 recommendations made in our 1993 review of the state's child welfare system. In order to make this determination, we interviewed DCFS administrators, reviewed policy, and reviewed the case files audited as part of our BSR review. In addition, we compared six outcome measures cited in our 1993 report with BSR's case file review results. Results of this comparison also suggests that progress has been made.

Nearly all Prior Recommendations Have Been Implemented

Of the 37 recommendations presented in our 1993 audit of Utah's Child Welfare System, we found that all but three have been adequately incorporated into policy or otherwise implemented. Two of the three exceptions are related recommendations that deal with conducting home visits during the CPS investigation. These two recommendations are addressed in policy, but not adequately. The third exception is a recommendation to train new workers on the elements needed to substantiate a referral. Despite incorporating our recommendations into policy and training, there are nonetheless some instances where the policy is not being observed or practiced. These shortcomings should be the source of further review and emphasis by DCFS.

However, we do not want to portray an impression that there are major deficiencies in the child welfare system. In fact we have seen improvements in many areas. For example, a major concern in our past audit and the subject of one of our recommendations dealt with conducting timely investigations and providing services for sex abuse victims. Staff at the Children's Justice Center reported that improvement has been realized in this area, reducing the average number of days to conduct a joint DCFS and law enforcement interview from nearly 30 days in June 1994 to as low as 4.4 days in February 1995, in the Salt Lake City area. Several factors contributed to this improvement. Most notably, the improvement appears to be stemming from

agreements between law enforcement agencies and DCFS as well as a procedure that makes use of centralized scheduling and coordinating of appointments between on-call law enforcement agents and DCFS workers.

Additional Policy Guidance is Needed

We found that unscheduled home visits were not accomplished or not documented in 11 percent of the cases we reviewed. Elements of that overall deficiency relate to three of our recommendations. We believe that rewriting the policy stated in the Child Welfare Manual regarding the conduct of home visits during CPS investigations would be beneficial in ensuring that workers understand the significance of conducting these visits. The current policy as quoted from the Child Welfare Manual states: *“An unscheduled home visit shall be made to address the allegations of the abuse/neglect or and to observe home conditions that may contribute to the child victim’s risk when a child is placed in protective custody. When a child is not placed in protective custody, a **scheduled or unscheduled** home visit **may** be made by the worker to observe home conditions which could contribute to the child victim’s risk, when/if conditions of the home are included in the referral as an allegation of risk”*. (Emphasis added).

The second sentence of this policy allows workers the option of giving advance notice of a home visit--in essence, tipping off the alleged perpetrator of an impending investigation. Such a practice, if employed, certainly could lead to invalid findings. Perhaps even worse, the implication is that workers have the option of not conducting a home visit when the child is not in protective custody even if it is warranted. We recognize that unscheduled home visits are not necessary or appropriate for all abuse or neglect investigations. However, we suggest that the appropriate policy be very simple and direct. That policy should be stated clearly that a home visit with documentation of that visit shall be considered for every investigation. If a home visit is not necessary or appropriate, that point must be documented in the case file. Interestingly, the CPS Quality Assurance form has a question that asks if an unscheduled home visit and conditions in the home are documented. This form is intended to be used as a review, then signed by workers and supervisors. Likewise, the Bureau of Services Review evaluation guide asks the same question.

We also found that our recommendation to train workers on the elements needed to substantiate or not-substantiate a case has not been enacted. However, a recent proposal from the CPS Steering Committee would incorporate guidelines regarding the substantiation decision into training and policy and will fulfill our original recommendation. We recommend that this proposal be incorporated into DCFS policy and training.

More Compliance With Established Policy is Needed

In total, we found a degree of performance deficiency or lack of compliance in 14 of the 37 recommendations we made. From this, we conclude that even though the recommendations are

for the most part addressed formally in policy, training, or through other practices, non-compliance or a degree of non-compliance in some areas is still a concern. It should be noted however, that in several cases non-compliance relates to multiple recommendations. For instance, as pointed out above, we found a deficiency in conducting home visits during some CPS investigations. Elements of that overall deficiency relate to three of our recommendations. Similarly, two of our recommendations relate to a deficiency wherein workers are not conducting all required home visits with children in foster care placements.

In the following paragraphs, we will present those shortcomings we observed where it appears that a good foundation in policy exists, but that the policy is not being followed in part or in total. Our findings are categorized and presented in three functional areas - Intake, CPS, and Foster Care.

Intake. We disagreed with the priority that was assigned in 16 percent of the cases we examined during our BSR review. Policy guidance regarding priority assignment as contained in the Child Welfare Manual is adequate if the intake workers are appropriately trained on that guidance and then their performance is monitored to ensure they follow that guidance. Regions handle intake differently. In some areas of the state, workers may fulfill multiple duties including intake as well as being an investigator and/or a foster care worker. In other offices, the intake function is accomplished by rotating protective services or foster care workers into the function on a short-term basis. Even in the large Central Region of DCFS where intake is centralized during normal business hours, the after-hours intake is accomplished by a rotating on-call worker. Such practices can lead to a lack of compliance with established policy since those doing intake may lack experience or knowledge in that function. Indeed, half the cases where we disagreed with the priority fit the examples cited here. A centralized intake function has been used in other states and may help resolve some of the problems noted.

Child Protective Services. In addition to the concerns previously expressed about home visits, we have concerns in four other areas: First, collateral contacts were not made in 14 percent of the cases reviewed. As in the case of home visits, collateral contacts are not always necessary or appropriate. However, it is a practice that should be considered on every investigation and documented when accomplished or justified in the case file when it is deemed unnecessary. In this area we found that in 4 of 5 cases where a collateral contact should have been accomplished but was not, it was because the parent or caretaker of the abused or neglected child was not interviewed by the worker. Second, addressing and documenting every allegation of abuse or neglect should be accomplished in every case file but was not accomplished in 14 percent of the cases reviewed. Third, 19 percent of the time, a face-to-face interview with the victim child or children was not accomplished by the DCFS worker. Finally, 6 percent of the time a risk assessment was not completed by the worker.

Foster Care. Our review of foster care files revealed that shortcomings still exist in four areas: In the first area, we found that one or more specific details were omitted in the service plans in 2 of 15 cases. Specifically, the service plan did not identify the services to be provided to accomplish the service plan. Expected changes in the behavior of either the parent or child that would allow for successful completion of the service plan were not included in 5 of 15 cases. Consequences for failure to comply with the service plan was lacking in 3 of 15 cases reviewed.

Our second area of concern regards visits with children in out-of-home placements where we found, as mentioned previously, that none of the cases reviewed were in total compliance with the DCFS policy requirements. In 4 of 15 cases workers did not accomplish weekly visits in accordance with policy during the first month of out-of-home placement, while in 13 of 15 cases the worker failed to make the required twice monthly visits after the child's initial month in care.

Third, we found where in 27 percent of the foster care cases reviewed, the service plan did not include required case history information pertinent to case planning, including prior referrals and service history. Although we cannot state with certainty that caseworkers did not review all prior files upon receiving these cases, the lack of documents in the case file related to prior history is an indication that this may not have occurred.

Finally, the DCFS Corrective Action Plan indicates that recruitment of foster care providers has been out of compliance in the past. Our audit did not allow sufficient time to pursue this area thoroughly. However, conversations with DCFS personnel indicate that recruiting and maintaining foster care placement sites is a problem that needs to be reviewed with steps taken to rectify the apparent inadequacies in this area.

Six Outcome Measures From 1993 Show Improvement

In addition to reviewing implementation of our 1993 audit recommendations, we also compared outcome measures from our 1993 report with similar outcome measures in BSR's 1996 report. Six outcome measures were selected for comparison. Results of the comparisons, shown in Figure IV, suggest that improvement has been made with the level of compliance in each area. During our previous audit, we reviewed 100 CPS investigations and 100 foster care cases in order to determine how well DCFS was accomplishing its goal of protecting children from abuse or neglect, preserving families wherever possible, and finding a permanent home for foster children as soon as possible. We found room for improvement in foster care with workers establishing permanency for children in a timely manner. In CPS investigations, we found room for improvement with investigators not conducting home visits, not conducting timely investigations, and not collecting enough evidence to support substantiation decisions.

We also found room for improvement in the intake process where adequate documentation was not taken to support the decision not to accept referrals for investigation.

It should be noted that while the performance indicators compared in this section suggest that improvement has been made by DCFS workers, it does not necessarily mean that the overall system has improved or that incidents of non-compliance do not exist in other areas. Trying to determine the overall condition of a complex system like child welfare is extremely difficult. Case file review based on statistical sampling only provides a “point in time” view of select performance indicators and may not fully capture the condition of the overall system. The indicators compared in this section show that caseworkers appear to be doing a better job in the specific areas indicated. However, extending that judgment beyond those specific areas would not be appropriate.

Moreover, it should also be remembered that our 1993 audit was not intended to represent a statistically valid depiction of state’s entire child welfare system. One hundred cases reviewed in both foster care and CPS were intended to provide a “snapshot” of what was going on with select cases within the system. In order to provide a statistically valid analysis of the entire system, we would have had to extract a larger audit sample and conduct a more extensive review. Figure IV summarizes our comparison of outcome measures.

**Figure IV
 Comparison of Outcome Measures**

Outcome Measure	Percent Non-compliance Reported by:	
	Legislative Auditors 1993	BSR 1996
Permanency not established in a timely manner	19%	3%
Caseworker did not conduct a home visit	12	11
Caseworker did not conduct a timely investigation (Was child seen within the priority time frame?)	24	16
Caseworker did not collect enough evidence to support a substantiation decision	19	8
Caseworker made wrong substantiation decision. (Was the child protected?)	14	8
Does documentation adequately support decision not to accept referral?	23	8

Indicators from 1993 showed that 19 percent of the foster cases reviewed did not establish a permanent family for the child in a timely manner because DCFS did not follow good permanency planning principles. Caseworkers often did not make timely decisions or service plans were not goal-directed and time-limited. Children involved in these cases averaged 3.1 years in foster care compared to 1.5 years in cases where we had no concerns over the timeliness by which permanency was established. BSR reviewed performance in this area by evaluating whether DCFS acted in a timely manner to obtain permanency for the child, whether it be to return the child home, free the child for adoption or place the child in permanent foster care. BSR reported only 3 percent non-compliance in this area.

In 12 percent of the CPS investigations reviewed in 1993, the caseworker did not visit the home of the alleged victim of abuse or neglect. Without an assessment of home conditions, we felt the caseworker was incapable of making an accurate assessment of the risk to the child. BSR reviewed performance in this area by evaluating whether caseworkers made an unannounced home visit to observe the home conditions. BSR reported 11 percent non-compliance in this area.

Twenty four (24) percent of the CPS investigations in 1993, were not conducted in a timely manner. Criteria for evaluating the timeliness of an investigation was taken from the Child Welfare Manual which directs that caseworkers shall respond to Priority I, II, and III referrals within 1 hour, 24 hours, and 3 working days respectively. BSR reviewed performance in this area by evaluating whether the investigation was initiated and the child seen within the priority time frame. BSR reported 16 percent non-compliance in this area.

Nineteen (19) percent of the CPS investigations we reviewed did not contain enough documented evidence to support the substantiation decision. Evidence collected by the caseworker did not support the decision to substantiate the allegation of abuse or neglect. The substantiation decision is important because it directly impacts child safety and could be valuable in court proceedings. Furthermore it provides an indication as to the extent of abuse or neglect in the state. The Child Welfare Manual indicates that the decision to substantiate should be based on "credible evidence" collected during the investigation. BSR reviewed performance in this area by evaluating whether the CPS worker's documentation supports the outcome (substantiated versus unsubstantiated) decision. BSR reported 8 percent non-compliance in this area.

In 14 percent of the CPS investigations in 1993, the caseworker made the wrong substantiation decision. While considerable debate exists as to when a referral should be substantiated, we determined, based on policy outlined in the Child Welfare Manual and discussions with the state's child protection specialist, that evidence contained in the case file supported a different outcome decision than the one made by the CPS investigator. BSR reviewed performance in this area by evaluating whether the CPS workers' actions resulted in adequate protection of the child; specifically, BSR asks if the child was protected. BSR reported 8 percent non-compliance in this area.

Lastly, our 1993 audit found that 23 percent of the referrals not accepted for investigation by DCFS should have been investigated. Determining which referrals should be accepted for investigation and which should be rejected is an important responsibility of the intake worker. The intake worker typically receives telephone calls alleging abuse or neglect. This worker determines which referrals should be accepted for investigation based on whether the caller is reporting conditions that fall within the definitions of child abuse or neglect and whether DCFS has an appropriate role to play with the family. BSR reviewed performance in this area by evaluating whether documentation collected during the intake process adequately supports the decision not to accept the referral. BSR reported 8 percent non-compliance in this area.

We again stress that our conclusions are based on the six indicators listed above. Extending that judgment beyond those specific areas would, in our opinion, be inappropriate. Nevertheless, the indicators shown above do seem to indicate that some improvement has been made.

Recommendations:

1. We recommend that BSR clearly define the criteria for “Documented Exception” and “Not Applicable” in the compliance review.
2. We recommend that BSR clearly define the criteria for evaluating performance. We suggest that BSR consider the categories of “Acceptable” “Needs Improvement” and “Unacceptable” in the performance review. Regardless of the categories chosen; however, BSR needs to clearly define and train reviewers on the proper use of ratings.
3. We recommend that BSR develop a scoring system that is consistently applied to policy requirements involving multiple occurrences.
4. We recommend that DCFS change the Child Welfare Manual policy regarding home visits during the CPS investigation to reflect that a home visit with documentation of that visit shall be considered for every investigation. If a home visit is not necessary or appropriate, that point must be documented in the case file.
5. We recommend that DCFS continue to investigate the alternative of establishing a centralized intake process.
6. We recommend that DCFS adopt the current proposal of the CPS Steering Committee regarding criteria to follow in making the substantiation decisions.

We hope this letter responds to your concerns about BSR’s 1996 review process and provides you with adequate information regarding improvements that have been made in DCFS. A letter of response from the Bureau of Services Review and from the DCFS is attached. Please contact us if we can assist you further.

Sincerely,

Wayne L. Welsh
Auditor General

WLW:KDB:lm

Agency Response