DEPARTMENT OF HUMAN SERVICES – FOLLOW UP ON CHILD AND FAMILY SERVICES AUDIT

LFA LEGISLATIVE FISCAL ANALYST
SOCIAL SERVICES APPROPRIATIONS SUBCOMMITTEE
STAFF: STEPHEN JARDINE

ISSUE BRIEF

SUMMARY

The audit of the Division of Child and Family Services (Report 2011-02: *A Performance Audit of the Division of Child and Family Services (DCFS)* found at http://le.utah.gov/audit/ad_2011dl.htm) was heard by the Social Services Appropriations Subcommittee in the 2011 General Session. The subcommittee passed intent language to have DCFS report back on the progress and status of the audit's recommendations during the 2012 General Session with special emphasis on certain recommendations affecting the DCFS budget (SB 2, item 87, 2011 General Session). The Office of the Legislative Fiscal Analyst did an in-depth budget review of the Department of Human Services, including DCFS, in conjunction with the Legislative Auditor General's performance audit (see the separate issue brief *DHS – Follow Up on Human Services In-depth Budget Review*). The Analyst recommends the Legislature adopt intent language requiring DCFS to report its progress to the Social Services Appropriations Subcommittee during the 2013 General Session in order to track continued progress regarding the audit's recommendations. Fiscal Analyst recommendations are also included.

LEGISLATIVE ACTION

The Analyst recommends the Legislature:

1. The Fiscal Analyst recommends the Legislature adopt intent language requiring the department and DCFS report its progress to the Social Services Appropriations Subcommittee during the 2013 General Session in order to track continued progress regarding the audit's recommendations with special emphasis on certain recommendations affecting the DCFS budget.

BACKGROUND

The Office of Legislative Auditor General (OLAG) did a performance audit on the Division of Child and Family Services (see Report 2011-02: *A Performance Audit of the Division of Child and Family Services (DCFS)* found at http://le.utah.gov/audit/ad_2011dl.htm) and subsequently reported to the Social Services Appropriations Subcommittee. The subcommittee heard the audit and passed intent language requiring DCFS report during the 2012 General Session on its actions and progress regarding the audit's recommendations with special emphasis on certain recommendations affecting the DCFS budget (SB 2, item 87 2011 General Session).

Concurrently, the Office of the Legislative Fiscal Analyst (LFA) did an in-depth budget review on the Department of Human Services, including the Division of Child and Family Services (*Human Services In-depth Budget Review* found at http://le.utah.gov/interim/2010/pdf/00001613.pdf). Both OLAG and the Office of the Legislative Fiscal Analyst coordinated efforts around DCFS. The in-depth budget review included 15 major recommendations and 14 additional recommendations, a number of which applied to DCFS. Status and implementation for all 29 recommendations is reported in the issue brief *FY2013 – DHS – Follow Up on Human Services In-depth Budget Review*.

LEGISLATIVE INTENT LANGUAGE

The Legislature passed the following intent language in its 2011 General Session:

Senate Bill 2, Item 87 (for FY 2012):
The Legislature intends the Department of Human Services and the Division of Child and Family Services (DCFS) report back during the 2012 General Session actions and progress regarding the following items from the Auditor Generals audit of DCFS and the affect of these items on the DCFS Fiscal Year 2012 appropriated budget: 1) the mixture of in-home services compared to out-of-home services; 2) progress on policies, training, and implementation of enhancements to in-home services; 3) funding by program as shown in audit figure 1.2 with enhanced information regarding annual numbers served and the cost per individual served; 4) trends of in-home and foster care services as shown in audit figures 2.1 and 2.3; 5) cost and utilization of foster care services by

region as shown in audit figures 3.1 and 3.2; 6) inter-region placements and use of courtesy worker visits by region as shown in audit figure 5.1; 7) number of full-time equivalent (FTE) positions that staff all child protective services, in-home, and foster care cases on the last day of the fiscal year as a percentage of all FTEs shown by region; 8) annualized subsidy cost per adoption by region as shown in audit figure 6.6; 9) regular review, monitoring, and reevaluation of the appropriateness of all foster care placements; 10) review of staffing practices among the divisions five regions to ensure accurate caseload calculations; and 11) adoption subsidy policies and funding practices to bring more consistency to regional practices.

LEGISLATIVE ACTIONS TAKEN FOLLOWING THE DCFS PERFORMANCE AUDIT

Legislative actions on the DCFS Performance Audit recommendations have been taken in the following four general ways:

1. Intent language included in 2011 appropriations bill (SB 2, items 87) to have DCFS report its actions and progress on the audit's recommendations during the 2012 General Session,
2. Performance audit recommendations incorporated into budget reductions or budget actions during the 2011 General Session,
3. Specific motions or requests from the Social Services Appropriations Subcommittee to DCFS for follow up, and
4. Specific follow up on the audit by the Child Welfare Legislative Oversight Panel at its November 29, 2011 meeting.

SPECIFIC REQUESTS FROM THE AUDIT CONTAINED IN INTENT LANGUAGE

The Social Services Appropriations Subcommittee passed intent language in the 2011 General Session requiring DCFS to report back on specific items as follows:

Division of Child and Family Services Response:
(1) The mixture of in-home services compared to out-of-home services:

COMPLETE

The Division has focused significant effort towards reducing the number of children in foster care and strengthening the in-home services program. Most of the in-home services work has been preparatory, so has not yet impacted the in-home trends. There has been some reduction of the number of children in foster care. See Attachment 1 for specific data as follows:

- Figure 2.1: Comparison of in-home services cases (families) to foster care cases (individual children)
- Figures 2.1-A (new): Comparison of numbers of children served in in-home services and foster care
- Figure 2.3: Historical numbers of children entering, exiting, and remaining in foster care statewide
- Figure 2.3-A (new): Foster Care entry rate for Federal Fiscal Year 2009, number of children in foster care per 1000 in the population, comparing Utah to other states
- Figure 2.3-B (new): Foster Care entry rate for point in time 9/30/09, number of children in foster care per 1000 in the population, comparing Utah to other states
- Figure 2.3-C (new): Median length of stay (months) for children in foster care for point in time 9/30/09, comparing Utah to other states
- Figure 2.3-D (new): Median length of stay (months) for children in foster care for Federal Fiscal Year 2009, comparing Utah to other states

(2) Progress on policies, training, and implementation of enhancements to in-home services

IN PROCESS:
The Division has made significant progress in developing enhancements for in-home services. This is a multi-year effort, with components to be implemented in phases. Key accomplishments and plans include:

- Established design for in-home services enhancement, using existing practice model with new evidence-based tools assessing risk and service needs, and in-home services matrix/resource development.
- Developing in-home services matrix to include evidence-based interventions, resources, programs; contracted services; and caseworker home visiting activities. Target completion date for the matrix is March 2012.

- Developing evidence-based safety and risk assessment and reassessment tools and updating practice guidelines for implementing tools and matrix.
- Training for the safety and risk assessment tools for pilot sites will occur in January 2012 with implementation in pilot sites in February 2012. Training for remaining staff and legal partners scheduled from April to July 2012, with implementation following training.
- Reallocated grant funding to increase funds for in-home services.
- Reallocated a portion of personnel funding between regions to balance caseworker capacity for core services, including in-home services.
- Key next steps:
    - Develop another evidence-based, structured decision making tool, Family Strengths and Needs Assessment starting in September 2012, with a goal for completion by the end of 2012.
    - Identifying current availability, including funding, for specific services and resources that are components of the matrix, on a regional and community level.
    - Identifying available funding that may be used to contract for or provide services or resources that are components of the matrix that are not currently available.
    - Prioritizing needs for contracting for or developing services or resources that are components of the matrix but that are not currently available in specific regions and/or communities and establishing new contracts to the extent that funding is available.
    - Identifying new ways to use existing funding and seeking additional funding to more fully make matrix of services available statewide. This will include applying for a Title IV-E waiver under newly passed Federal legislation, "The Child and Family Services Improvement and Innovations Act."

(3) Funding by program as shown in audit figure 1.2 with enhanced information regarding annual numbers served and the cost per individual served

COMPLETE
Note: Upon further review, DCFS modified the method of allocating costs to programs using Random Moment Sample (RMS) data to more accurately distribute general caseworker and SAFE data system costs to each program area.

Figure 1.2 Direct Costs of DCFS programs for Fiscal Year 2011

Program and State Office Administration	Expenditures	Percent
Foster Care (Out of Home)	$ 84,130,000	56%
Adoption Services	$ 18,857,600	12%
Child Protective Services	$ 12,591,300	8%
In-Home Services	$ 11,603,600	8%
Domestic Violence	$ 6,918,200	5%
Child Abuse Prevention	$ 3,682,100	2%
Subtotal Programs	$ 137,782,800	91%
Administration	$ 13,189,900	9%
Total Expenditures	$ 150,972,700	100%

Figure 1.2-A Enhanced Data for DCFS Direct Service Programs FY 11(new)
(Note: Adoption Services Data is reported below.)

Program Area	Total Expenditures^	Total Cases Served*	Average Cost Per Case^
Foster Care (Out of Home)~	$84,130,000	4,664	$18,038
Child Protective Services	$12,591,300	19,544	$ 644
In-Home Services	$11,603,600	6,069	$ 1,912

**Foster Care/Out of Home is per child; In-home services are per family; CPS is per case that has been closed.*
~Ave cost per case for foster care is based on an average of 215 days per case. If annualized, cost is $30,593 per child/year.
^Amounts are rounded

(4) Trends of in-home and foster care services as shown in audit figures 2.1 and 2.3

COMPLETE
Refer to Item #1 above. Figures 2.1 and 2.3 are included in Attachment 1.

(5) Cost and utilization of foster care services by region as shown in audit figures 3.1 and 3.2

COMPLETE

Figure 3.1 Foster Care Daily Rates and Expenditures by Placement Structure

Placement Level	Total Spent	Days of Service	Wt. Ave. Daily Rate
Foster Care Level 1	$ 4,355,350	296,715	$ 14.68
Foster Care Level 2	$ 1,744,098	106,544	$ 16.37
Foster Care Level 3	$ 2,047,012	73,458	$ 27.87
Subtotal DCFS Foster Homes	**$ 8,146,459**	**476,717**	**$ 17.09**
Proctor Home	$ 8,267,634	167,196	$ 49.45
Subtotal Proctor	**$ 8,267,634**	**167,196**	**$ 49.45**
Residential-Moderate	$ 3,991,043	38,949	$ 102.47
Residential – High	$ 6,361,391	39,415	$ 161.40
Residential - Individualized	$ 8,820,330	32,096	$ 274.81
DSPD Waiver*	$ 955,083	30,547	$ 31.27
Subtotal Residential	**$ 20,127,846**	**141,007**	**$142.74**
Grand Total	**$ 36,541,939**	**784,920**	**$ 46.55**

**These costs only include foster care maintenance for those on the DSPD waiver. The treatment portion is paid by Medicaid.*

Figure 3.1-A Foster Care Expenditures by Placement Structure and Region (new)

Placement Type	Northern	Salt Lake	Western	Eastern	Southwest	Total
Foster Care Level 1	1,380,563	1,303,854	623,008	516,010	531,915	4,355,350
Foster Care Level 2	252,727	755,236	400,085	174,908	161,141	1,744,098
Foster Care Level 3	439,904	248,908	1,057,659	213,422	87,119	2,047,012
Proctor Home	1,957,054	3,609,041	1,002,528	890,841	808,170	8,267,634
Residential - Moderate	1,116,527	1,306,310	937,832	432,310	198,064	3,991,043
Residential - Intensive	1,159,658	3,530,947	786,016	464,424	420,345	6,361,391
Residential - Individual	1,173,973	3,942,618	1,881,937	984,346	837,455	8,820,330
DSPD Waiver	164,674	435,608	145,326	126,828	82,647	955,083
TOTAL	**7,645,081**	**15,132,523**	**6,834,391**	**3,803,088**	**3,126,856**	**36,541,939**

Figure 3.2 Comparison of Use of Level 3 (formerly Structured) Foster Homes and Proctor Homes Point in time Placement on 6/30/11

Region	Level 3 (Structured) Foster Homes	Level 3 as a % of Total	Proctor Homes	Proctor Homes as a % of Total	Total Placements
Eastern	21	31%	47	69%	68
Northern	31	21%	115	79%	146
Southwest	8	16%	42	84%	50
Salt Lake	16	8%	192	92%	208
Western	86	62%	52	38%	138
Statewide Total	162	27%	448	73%	610

Note: DCFS has been working on new processes to strengthen use of Level 3 foster homes. Practice guidelines are expected to be completed by April 2012, with implementation no later than the beginning of FY 13.

(6) Inter-region placements and use of courtesy worker visits by region as shown in audit figure 5.1

IN PROCESS

Figure 5.1 Inter-Region Placements and Use of Courtesy Workers.

This figure shows the number of placements outside each region within Utah as well as the number of courtesy workers assigned outside each region as of 1/3/12.

Region	Inter-region Placements	Number Courtesy Workers	Utilization Rate
Northern	147	11	7.5%
Salt Lake Valley	161	7	4.3%
Western	84	3	3.6%
Eastern	122	6	4.9%
Southwest	41	9	22%
Statewide Total	555	36	6.5%

Figure 5.1-A (new) Where Region Case Placements Are

Region With Case Jurisdiction	**Region of Child's Placement**						
	Northern	Salt Lake Valley	Western	Eastern	Southwest	Other*	Total
Northern	555	83	45	5	14	17	719
Salt Lake Valley	42	634	87	5	27	43	838
Western	12	40	446	5	27	7	537
Eastern	14	35	57	137	16	2	261
Southwest	6	16	19	0	221	12	274

**Other includes children on the run and placed out of state that are not considered inter-region placements.*

After careful review of Performance Audit recommendations, DCFS administration concluded that a child's best interest should first be taken into account when considering use of a courtesy caseworker. The decision to use a courtesy caseworker will be made on a child by child basis and not as a standard across regions; however, there are times when use of courtesy caseworkers is appropriate. Updated protocol for requesting a courtesy caseworker and creation of a formal agreement for courtesy caseworkers, including expectations, are in the process of being drafted for inclusion in administrative guidelines. This is expected to be completed by April 2012.

(7) Number of full-time equivalent (FTE) positions that staff all child protective services, in-home, and foster care cases on the last day of the fiscal year as a percentage of all FTEs shown by region

IN PROCESS
Compilation of this data is still in process. It will be available by January 20, 2012.

(8) Annualized subsidy cost per adoption by region as shown in audit figure 6.6

COMPLETE

Figure 6.6 Costs for New Adoptions by Region for FY 11

Region	Annualized Subsidy Costs	Number New Adoptions^	Cost Per New Adoption
Western	$129,060	71	$1,818
Eastern	$114,792	48	$2,392
Northern	$250,200	179	$1,398
Southwest	$ 65,664	55	$1,194
Salt Lake Valley	$179,040	221	$ 810
Statewide	**$738,756**	**574**	**$1,287**

^Includes all new Adoption Maintenance (AAM) Cases

(9) Regular review, monitoring, and reevaluation of the appropriateness of all foster care placements

COMPLETE
DCFS has implemented a regular assessment for all foster children that is evidence-based and that also addresses placement needs. SAFE prompts workers to complete this assessment based on time periods specified in practice guidelines and to evaluate placements based on assessment findings. Regions conduct regular screening of higher cost placements. SAFE programming is under development for documentation that screening has been completed.

(10) Review of staffing practices among the division's five regions to ensure accurate caseload calculations

DCFS is in the process of completing an internal, in-depth review of staffing among the division's five regions. The following actions have been taken:

- Met with each region administrative team separately to gather information about existing staffing practices for both administrative and service functions.
- Compiled region information by position/function for comparison across regions.
- Analyzed each regional administrative and service position/function in State Leadership Team meetings held over a six month period of time.
- Identified inconsistencies in utilization of some positions and evaluated/prioritized for need for consistency.

- Are in process of developing recommendations for changes in staffing in some program and geographic areas, with the goal to create additional capacity for in-home services and ensure that caseloads are more balanced between regions.
- Transition plans and time frames will be developed in the coming months, with implementation during FY 13.

(11) Adoption subsidy policies and funding practices to bring more consistency to regional practices

IN PROCESS
DCFS is in the process of making modifications to adoption subsidy policies and funding practices to being more consistent among regions. The following actions have been taken:

- Completed review of monthly subsidy policies in multiple settings with state and regional level staff to assess for language ambiguity and to identify inconsistencies in interpretation of policies. Obtained a range of recommendations and options to address inconsistencies and ambiguity.
- Reviewed detailed adoption subsidy data by region to better assess patterns of inconsistencies.
- Analyzing policy recommendations and options received from regional and state office staff. Developing recommendations for consideration by State Leadership Team by March 2012.
- Process put in place for periodic review of regional adoption subsidy data being by the Adoption Program Administrator to determine if inconsistencies are corrected.

TWO ATTACHMENTS PROVIDED BY THE DIVISION OF CHILD AND FAMILY SERVICES:

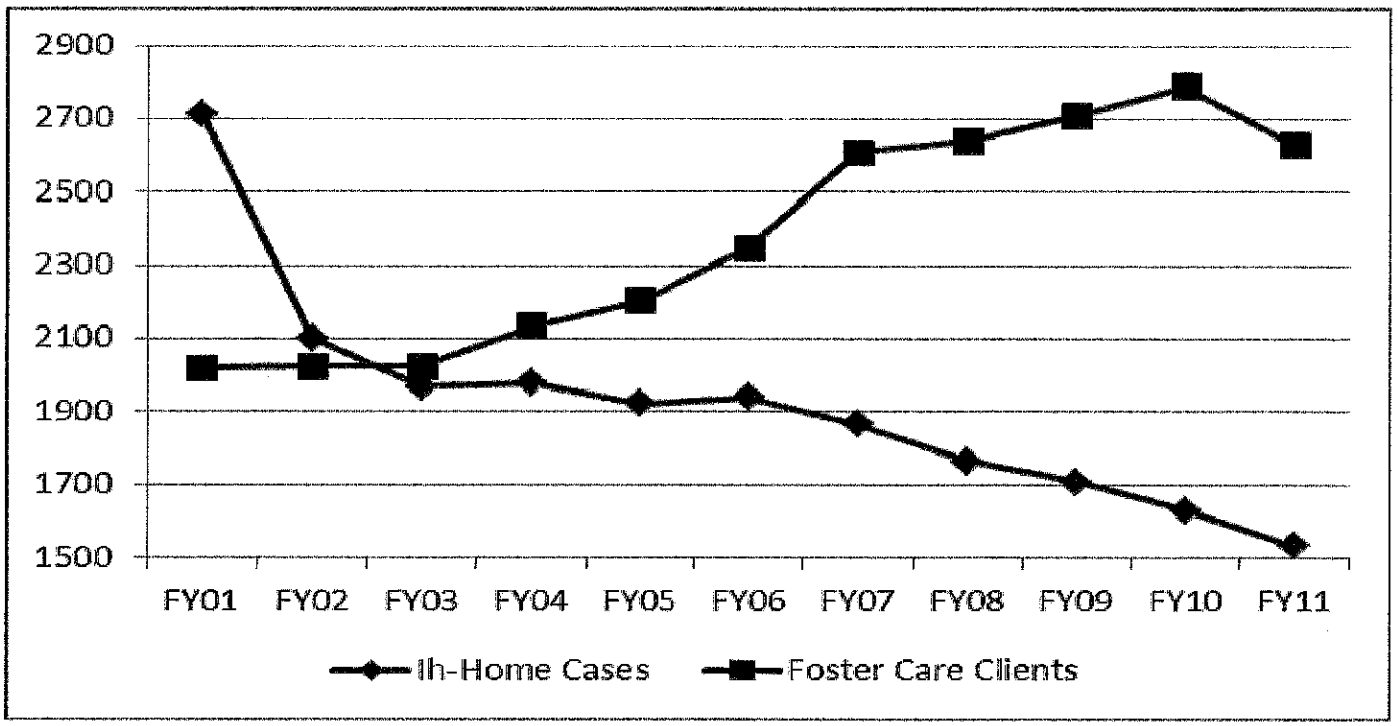
The Division of Child and Family Services provided the following two attachments: 1) *Mixture of in-home services compared to out of home services* and 2) a January 11, 2012 update of its report, *Progress and Status on the Audit's Overall Recommendations*, originally presented in November, 2012 to the Child Welfare Legislative Oversight Panel.

Attachment 1
Mixture of In-home Services Compared to Out of Home Services

Description or Intent: Item 1- The mixture of in-home services compared to out-of-home services (Chapter 2), Item 4-Trends of in-home and foster care services as shown in audit figures 2.1 and 2.3 (Chapter 2)

Response:
The following chart and description was used in the audit report (Figure 2.1 page 8). This figure has been updated for FY 2011 and shows a decline in the number of children in foster care, but does not yet show a reversal of the trend for in-home services.

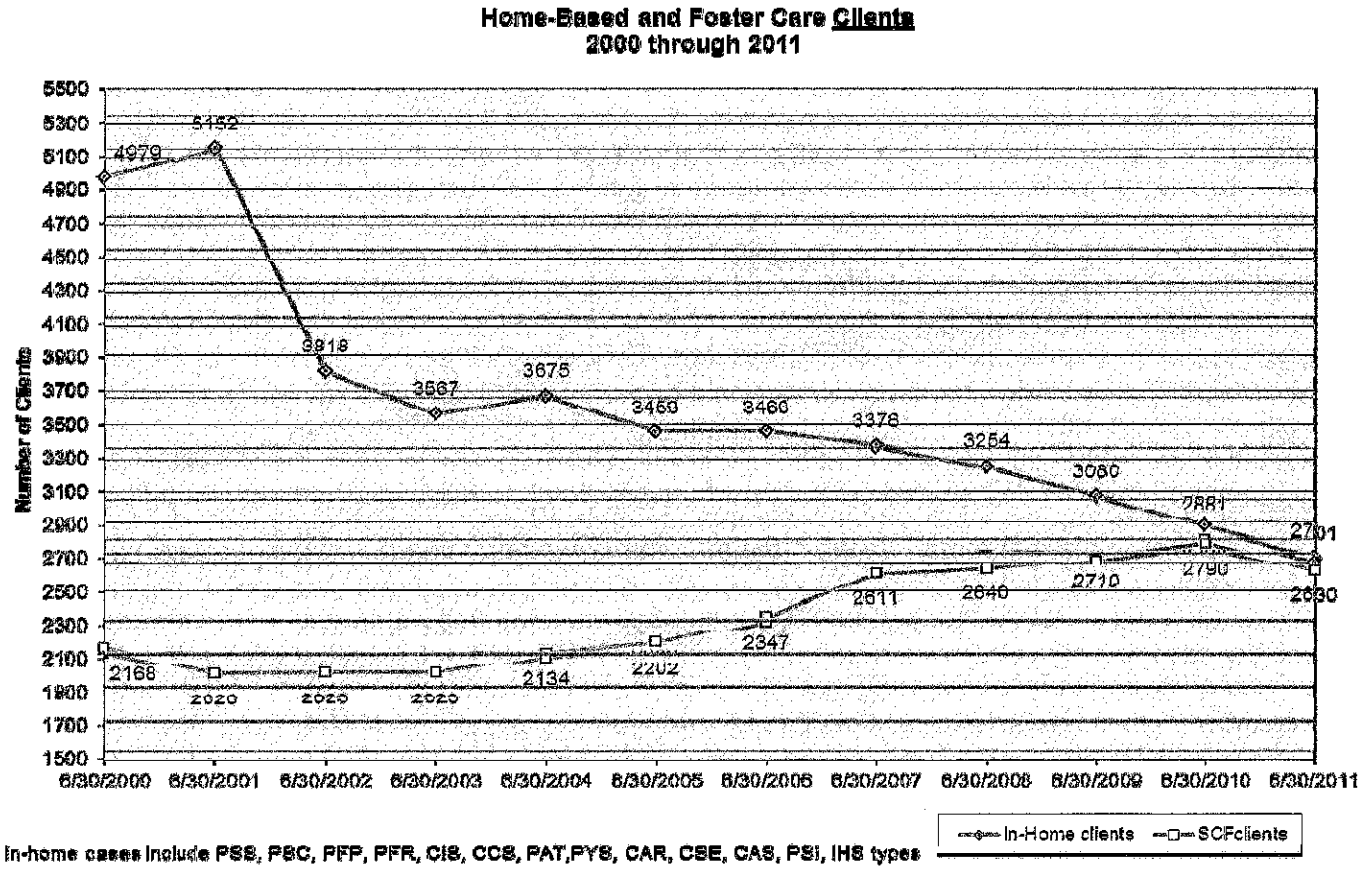
Figure 2.1 *"The Number of In-home Services Have Decreased While the Number of Children in Foster Care Have Increased (Point in Time 6/30). This figure shows that the number of children in foster care has steadily increased while in-home services, provided to prevent removals, have decreased." (Original language)*



While Figure 2.1 chart may be helpful in looking at a balance of caseload, it may not be the best representation of children served through in-home services. The reason for this is that a foster care case is child based (one child per case), while an in-home case is family based (multiple children per case). A family with a sibling group of 4 would show a count of 4 foster care clients, but only 1 in-home case.

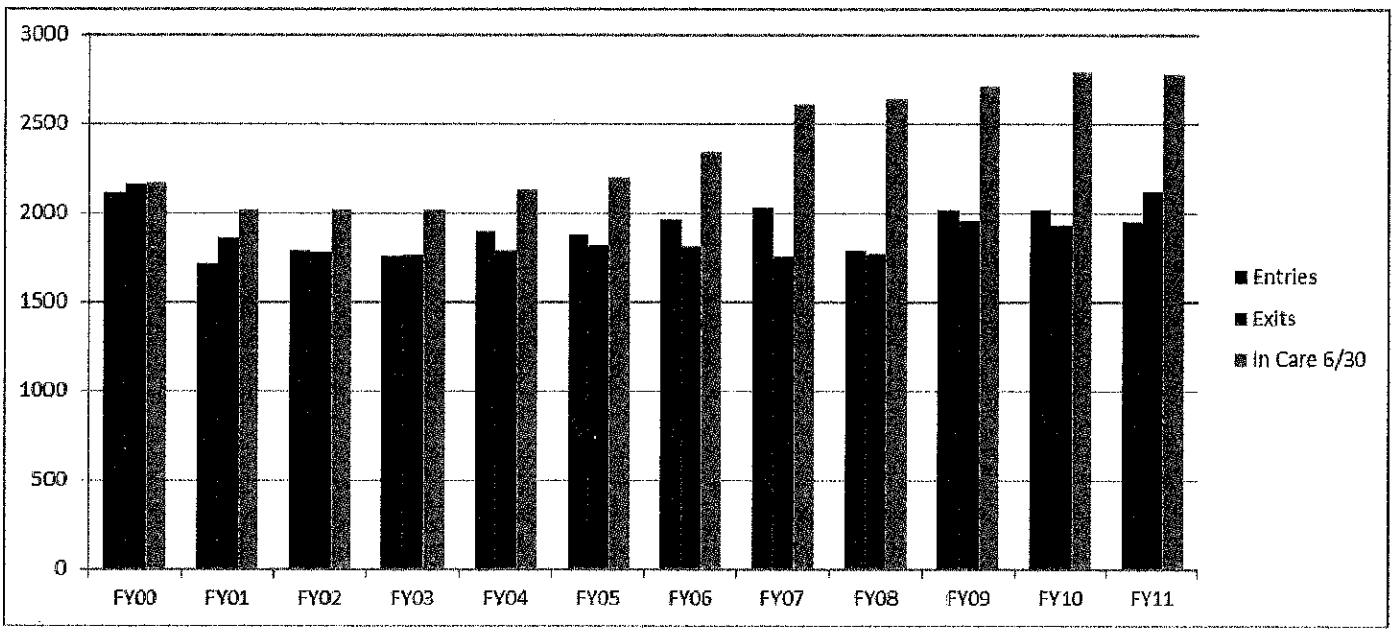
The following chart shows the comparison of actual child clients served through in-home and foster care services.

Figure 2.1-A



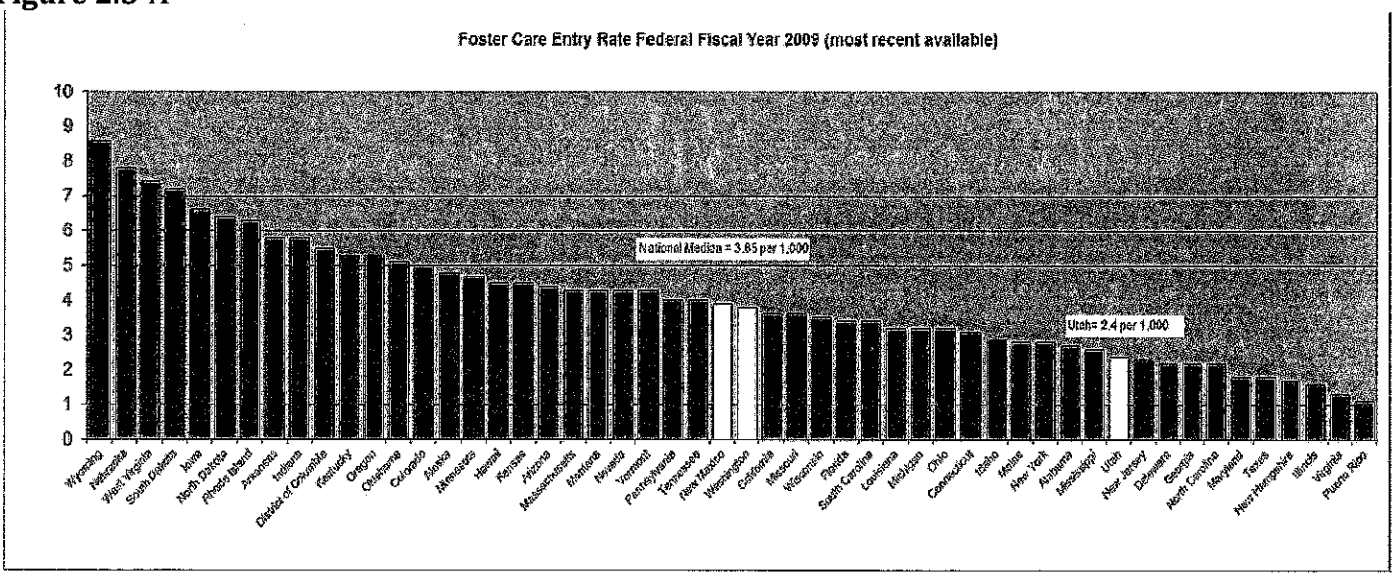
One of the reasons for the decrease in in-home services over the years is loss or transfer of funding. For example the funding for the Youth Services Program was transferred to the Division of Juvenile Justice Services. Appropriations were discontinued for The Families, Agencies, and Communities Together for Children and Youth at Risk (FACT) program and agencies involved were no longer able to continue those preventive services over time. Additionally some of the shift appears to be moving of resources to serving more children in foster care than in-home.

Figure 2.3 in the Audit shows the historical numbers of children entering, exiting, and remaining in foster care statewide and has been updated below to show the FY2011 numbers. For the first time since 2003, in FY 2011 the number of exits from foster care exceeded the number of entries and the number of children in care on the last day of the fiscal year reduced.



While the trend of increasing foster care and decreasing in-home services is concerning, and the agency is working to modify this trend, Utah is successful at keeping children in their home compared to other states. The most recent national data available is for Federal Fiscal Year 2009.[1] When looking at the rate of children entering foster care, Utah was lower than the national median.

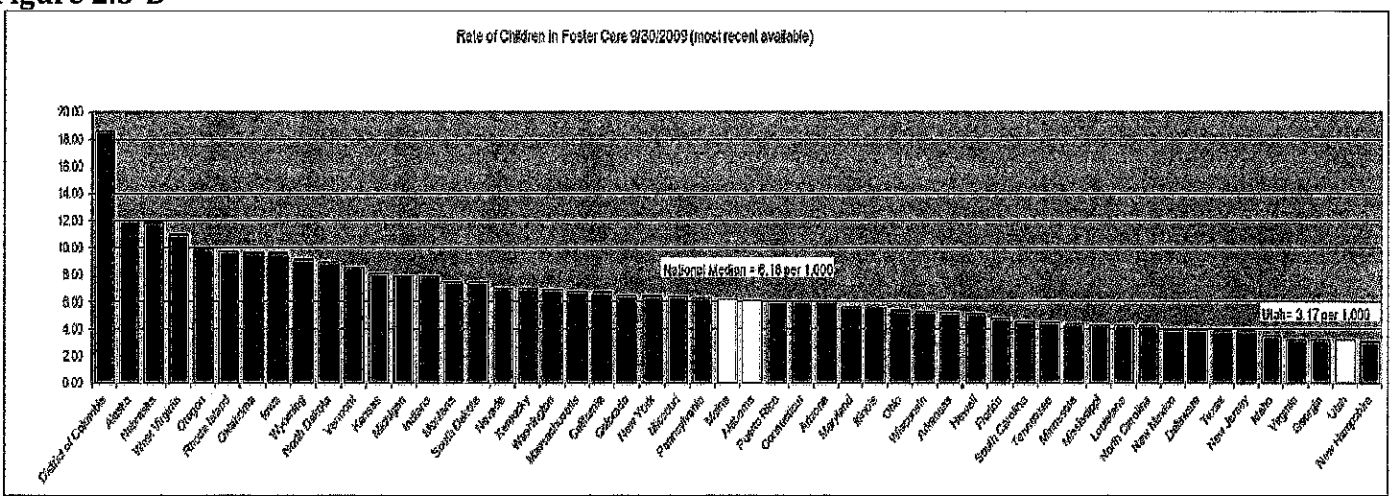
Figure 2.3-A



[1] http://cwoutcomes.acf.hhs.gov/data/ obtained December 2011

When looking at the rate of children in custody at the end of the fiscal year, Utah was nearly the lowest in the nation, less than half the national median rate.

Figure 2.3-B



The audit accurately reported that other states have worked to reduce the number of children in care. Even after others states' reductions, most are not matching Utah's success at maintaining children in their home.

The audit report also indicated that the length of time in care in Utah has been increasing. The same federal data shows that Utah is again below the average median length of time in care for both children in custody and children exiting custody.

Figure 2.3-C

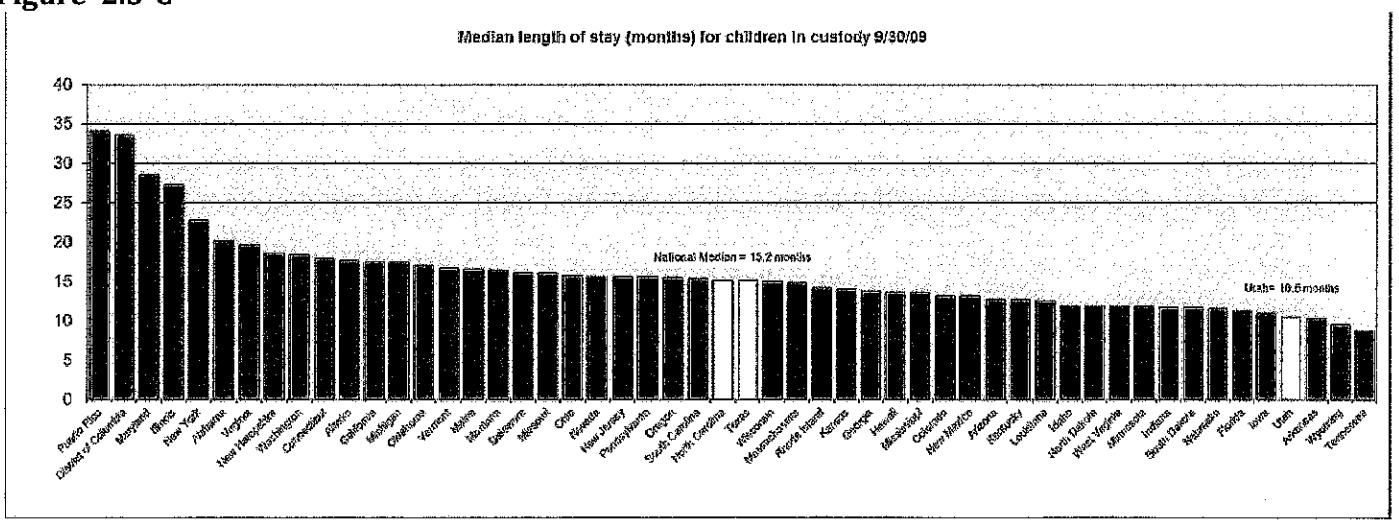
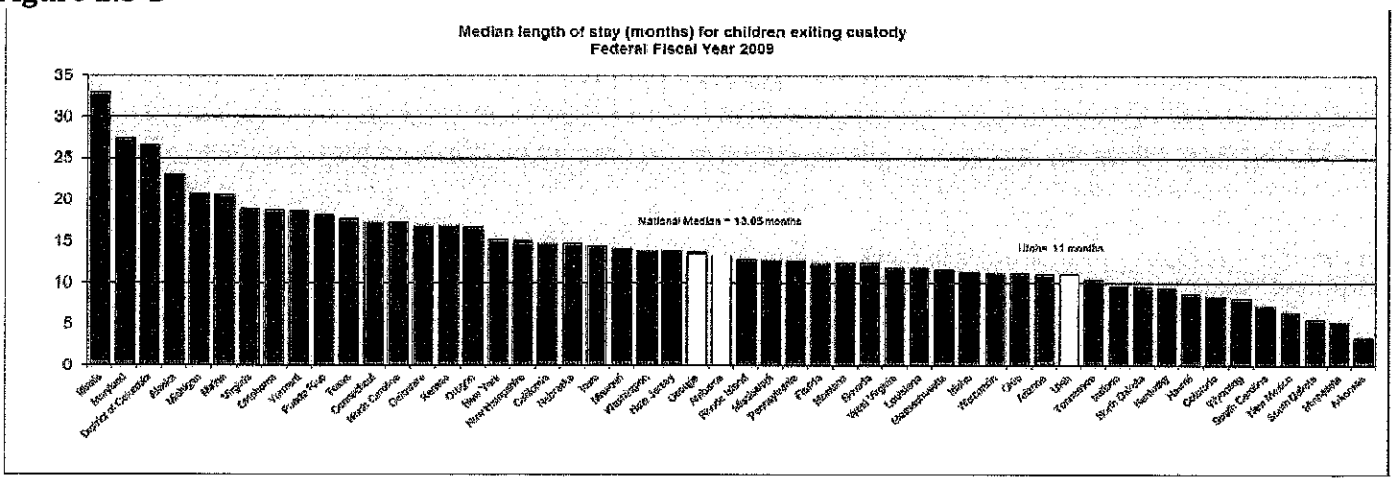


Figure 2.3-D



When DCFS does provide in-home services, families are successful 85-90% of the time at eliminating repeat maltreatment or foster care placement within a year of the in-home case closing.

Figure 2.3-E

Percent of Children who exited an In Home Case then had a subsequent supported child protective services investigation within 12 months

Case Type	FY04	FY05	FY06	FY07	FY08	FY09	FY10^	
Family Preservation	16%	14%	11%	11%	13%	13%	11%	PFP, PFR
Supervision	11%	13%	10%	10%	11%	12%	12%	PSC, PSS
Other Interventions	13%	11%	12%	13%	12%	12%	12%	CCS, CIS, PAT, PSI

Percentages are calculated from the total clients for each group
Family preservation: PFP, PFR Supervision: PSS, PSC, Home Study: IHS, Other interventions: CCS, CIS, PAT, PSI

Figure 2.3-F

Percent of Children who exited an In Home Case and had a subsequent foster care (SCF) case within 12 months

Case Type	FY04	FY05	FY06	FY07	FY08	FY09	FY10^	
Family Preservation	11%	10%	9%	9%	9%	9%	9%	PFP, PFR
Supervision	4%	6%	5%	4%	4%	4%	5%	PSC, PSS
Other Interventions	8%	7%	10%	8%	8%	8%	12%	CCS, CIS, PAT, PSI

^FY 10 is the most recent year for which data can be extracted.

DCFS Performance Audit Response Update
January 11, 2012

This document updates a progress report submitted to the Legislative Auditor General in November 2011 in response to their January 2011 Performance Audit of the Division of Child and Family Services.

Chapter II – Enhanced In Home Services

1. We recommend that DCFS select an in-home services model, train staff, and provide in-home services to families whose children are at risk of being removed from their home.

   IN PROCESS / This is a multi-year initiative.

   - Established a framework for in-home services enhancement, using the existing practice model in conjunction with evidence-based tools assessing risk and service needs and a matrix of service options based on client categories of need and service intensity.
   - Development of the matrix is continuing, with input from National Resource Centers (Federally contracted technical assistance providers for state child welfare agencies), other states, and from our own staff based on their experience of what works with families. Components of the matrix include evidence-based interventions, resources, programs; contracted services; and caseworker home visiting activities. Target completion date for the matrix is March 2012.
   - Identified evidence-based structured decision making safety and risk assessment tools to be used with Child Protective Services (CPS) cases, which will help guide the initial decision about the appropriateness of in-home services, including in-home service intensity, contact standards, and access to services voluntarily. These tools have been personalized for Utah's child welfare system and are being tested in SAFE. A second reassessment tool that will be utilized to help guide in-home services cases has also been under development and will be completed in April 2012.
   - Introduced structured decision making to all supervisors in December 2011. Training for the safety and risk assessment tools for pilot sites will occur in January 2012 with implementation in pilot sites in February 2012. Training for supervisors is tentatively scheduled in April 2012 and for caseworkers in May – June 2012, with implementation thereafter. Training for legal partners is tentatively scheduled for July 2012.
   - Have initiated development of practice guidelines pertaining to the decision-making tools and matrix of service options, with expected completion by April 2012.
   - Made decision to utilize an additional evidence-based, structured decision making tool, Family Strengths and Needs Assessment as another component of the in-home services program. Development of this tool will begin in September 2012, with a goal for completion by the end of 2012.
   - Implemented a pilot project in Northern region on a limited number of teams in two counties utilizing principles of the new in-home services model, including more intensive up-front support, more frequent contacts, and more use of voluntary services. This pilot will be analyzed to evaluate practical application of these basic principles as the full, formalized model is being developed for implementation statewide.
   - Reallocated grant funding to allow for hiring of Program Administrator specifically for in-home services.
   - Modified Promoting Safe and Stable Families grant funding allocations to increase funds for in-home services.
   - Reallocated a portion of personnel funding between regions to balance caseworker capacity for core services, including in-home services.
   - Next steps:

- Identifying current availability, including funding, for specific services and resources that are components of the matrix, on a regional and community level.
- Identifying available funding that may be used to contract for or provide services or resources that are components of the matrix that are not currently available.
- Prioritizing needs for contracting for or developing services or resources that are components of the matrix but that are not currently available in specific regions and/or communities.
- Establishing new contracts based on priorities for services to the extent that funds are available.
- Identifying new ways to use existing funding and seeking additional funding to more fully make matrix of services available statewide. This will include applying for a Title IV-E waiver under newly passed Federal legislation, "The Child and Family Services Improvement and Innovations Act."

2. We recommend that DCFS require all regions to implement the model and monitor regional use of the in-home model.

   IN PROCESS / This is part of the multi-year initiative described in Chapter II, Item #1 above.

   Implementation and monitoring plan is being developed in conjunction with the steps described in Item #1 above. All regions will be required to utilize the decision-making tools and matrix to identify which services are most effective for each child and family based on their individual circumstances. Implementation is expected to be completed statewide, to the extent resources are available to offer all service components of the matrix, and increased monitoring initiated in FY 13.

Chapter III – Foster Care Recommendations

1. We recommend that the Division of Child and Family Services determine strategies to provide lower cost alternatives to residential care by developing additional structured foster care homes.

   IN PROCESS

   - Established workgroup.
   - Gathered statewide information about current process for recruiting, training, and supporting Level III foster homes.
   - Identified core factors needed for recruiting and maintaining Level III foster homes.
   - Have received input from foster parents, Utah Foster Care Foundation, Utah Foster and Adoptive Family Association, and Office of Licensing on needs, obstacles, and recommended solutions.
   - Recommendations were developed and are being reviewed by the State Leadership Team by January 2012.
   - An implementation team will begin work in February 2012.
   - Strategies and practice guidelines should be finalized by April 2012.

2. We recommend that the Division of Child and Family Services review the Utah Foster Care Foundation contract to ensure the contract is meeting each region's needs for foster homes.

   COMPLETE

   - Completed initial review of UFCF contract and identified preliminary list of gaps in existing contract scope of work.
   - Met with UFCF Director to discuss review process and potential for contract changes.

- Met with region staff in December 2011 for comprehensive contract review to address specific region needs and recommendations for contract changes.
- Level III foster home workgroup (described in Chapter III, Item #1 above) provided input into the needed UFCF roles related to recruiting, training, and supporting Level III foster homes as strategies are finalized.
- Amendments to contract scope of work have been identified and have been given to the contract team for inclusion in the upcoming contract amendment, which will be effective for FY 13.

3. We recommend that the Division of Child and Family Services require and monitor that all regions complete the Permanency Utilization Reviews as required by policy.

   COMPLETE

   - Region administrative services managers were asked in June 2011 to monitor that Utilization Review Committee meetings are being held on an ongoing basis.
   - Program administrator staff attended and assessed each region's Utilization Review Committee meetings and identified variations in focus and processes. They also made follow-up visits to share best practices identified in region Utilization and Review processes.
   - CANS needs assessment for children in foster care has been implemented statewide, which is a periodic review of client need levels, and identifies cases that require review by the Utilization and Review processes for each region.
   - SAFE changes are being made to allow for automated documentation of reviews on a case by case basis. Data is not yet available to report.

4. We recommend that the Division of Child and Family Services strengthen controls over contracts.

   COMPLETE / (Strengthened controls are now in place, but actual implementation for all contracts will occur over a multi-year period.)

   - Added additional staff to strengthen contract procurement team.
   - Established contract audit team, including but not limited to financial auditor and licensed clinical social worker.
   - Clarifying roles for region contract staff.
   - Assessing contract language for proper controls for all contracts as they are initiated or amended. This has been completed for all new contracts. This recommendation will be fully implemented after the cycle has been completed for all existing contracts.

5. We recommend that the Division of Child and Family Services consider implementing the levers of change described in the Annie E. Casey Foundation report *Rightsizing Congregate Care* in order to reduce the use of expensive residential care.

   COMPLETE

   - Reviewed levers of change document.
   - Discussed concepts of document with one of the authors.
   - Determined that DCFS has already implemented levers of change elements in practice.
   - In future, will consider incorporating additional levers of change elements into upcoming practice and funding actions.

6. We recommend that the Division of Child and Family Services reconsider its decision to not use the guardianship subsidies allowed by the Fostering Connections to Success and Increasing Adoptions Act of 2008.

   IN PROCESS

   - Completed preliminary research about provisions of law.
   - Analyzing costs to implement initiative on a full scale or limited basis.
   - Options and recommendations will be provided to State Leadership Team by February 2012.
   - If decision is made that it is desirable to implement but unable to absorb increased costs, will prepare building block request for FY 14.

Chapter IV – Intake Recommendations

1. We recommend that the division continue efforts to centralize intake.

   COMPLETE

   - Transition to centralized intake was phased in by region from April to June 2011.
   - Full implementation was completed by July 2011.

2. We recommend that the division review the definitions of abuse and neglect in administrative rule to ensure they are consistent with statute.

   IN PROCESS

   - Workgroup reviewed statute and existing definitions and proposed revisions in rule.
   - AG's office review of definitions is near completion.
   - Rule has been filed and will be published for public comment Feb 2012.

Chapter V – Caseworker Management Recommendations

1. We recommend that DCFS make courtesy worker visits the standard for clients in inter-region placements rather than the exception.

   IN PROCESS (For Partial Implementation)

   - Held in-depth discussions with State Leadership Team regarding use of courtesy caseworker visits.
   - Obtained additional feedback and policy recommendations from region administrative teams.
   - Considered research on outcomes for children based on caseworker consistency.
   - Concluded that a child's best interest should first be taken into account when considering use of a courtesy caseworker; the decision to use courtesy caseworker will be made on a child by child basis and not be a standard across regions. However, there are times when use of courtesy caseworkers is appropriate.
   - Protocol for requesting courtesy caseworker and agreement for courtesy caseworkers, including expectations, will be drafted and included in administrative guidelines. This is expected to be completed by April 2012.

2. We recommend that DCFS further implement technologies such as the transcription service and portable laptops to enhance caseworker mobility.

COMPLETE

- Portable laptop computers have been provided to all caseworkers, primarily with one-time Federal grant funds, strengthening capacity to complete work while in the field.
- Blackberry or smart phones have also been provided to all caseworkers with enhanced capacity to text and access e-mail.
- Software applications were updated for staff statewide.
- Additional software was purchased to expand ability for web-based training and to facilitate teleconferencing.
- Transcription service has been analyzed and instructions prepared to help workers identify when it is cost effective.

3. We recommend that DCFS work with the Division of Facilities Construction and Management to reevaluate space standards for future building needs.

   COMPLETE / This is a multi-year project as building needs change.

   - DCFS worked with DFCM to reevaluate space standards as a lease for a new building was established for the DCFS Office in St. George, which was occupied in September 2011. Caseworkers in that office are now in cubicles.
   - This process will be continued for all future building needs.

4. We recommend that the Legislature require the Legislative Auditor General's Office or DCFS perform an in-depth review of staffing practices among the division's five regions (We recognize this is a recommendation to the Legislature, but please provide any information you may have on status of the implementation.)

   IN PROCESS

   Even though the Legislature did not include this requirement in intent language legislation in FY 11, DCFS determined that an internal, in-depth review of staffing among the division's five regions is desirable. The following action has been taken:

   - Met with each region administrative team separately to gather information about existing staffing practices for both administrative and service functions.
   - Compiled region information by position/function for comparison across regions.
   - Analyzed each regional administrative and service position/function in State Leadership Team meetings held over a six month period of time.
   - Identified inconsistencies in utilization of some positions and evaluated/prioritized for need for consistency.
   - Developing recommendations for changes in staffing in some program and geographic areas, with the goal to create additional capacity for in-home services and ensure that caseloads are more balanced between regions.
   - Transition plan and time frame will be developed in the coming months, with transitions implemented during FY 13.

5. We recommend that DCFS modify the way it calculates average caseloads and ensure new assumptions reflect actual caseworker experiences.

IN PROCESS

- Held preliminary discussions to analyze current criteria for calculating average caseloads, to identify problematic components, and to consider options for different methodologies to calculate average caseloads, while taking into account scenarios that may artificially inflate or deflate average caseload.
- Analysis and discussion have occurred with regions regarding consistency in functions and services provided.
- Data from the HR system that is loaded into SAFE is being refined to better capture needed data for analysis. This data is being combined with SAFE data on cases assigned to employees with different titles.
- A mathematical formula is being developed to attempt to account for the complexities that make calculation of average caseloads challenging. This formula and preliminary calculation has been developed and is in the process of being refined.
- Analysis of the preliminary calculation will be conducted to determine if changes in SAFE are needed to alter tracking of worker functions to further enhance calculations. This will be completed by April 2012.

Chapter VI – Adoption Recommendations

1. We recommend that DCFS strengthen adoption subsidy policies to more specifically designate which special needs and circumstances should receive specific monthly adoption subsidy amounts.

IN PROCESS

- State Office staff completed monthly adoption subsidies policy review for preliminary assessment of language ambiguity.
- Preliminary adoption subsidy data was pulled by region to better assess patterns of inconsistencies.
- Held a meeting with Salt Lake Valley Region administration and adoption subsidy management in October 2011 to understand the changes they have made in interpretation of policies in determining subsidy award amounts. Changes needed to comply with policy were identified.
- An adoption subsidy workgroup was held in November 2011 that included subsidy workers and finance staff throughout the state. A review of current rule language was conducted to better designate, to the extent allowable within Federal law, which special needs and circumstances should receive specific subsidy amounts. Additional inconsistencies in interpretation of rules were identified and policy questions discussed in depth. Several recommendations were given for potential policy revisions. The workgroup was trained to assess adoption subsidies in a consistent manner.
- Additional policy recommendations are being analyzed. Recommendations will be developed and presented to the State Leadership Team by March 2012.
- Regional monthly adoption subsidy data will be analyzed periodically by the Adoption Program Administrator to determine if inconsistencies have been corrected.

2. We recommend that DCFS utilize more recent average cost data when requesting additional funding for its adoption subsidy program from the Legislature.

COMPLETE

- Analyzed FY 11 data to calculate need for FY 13 building block. Subsidy amounts were calculated based on new subsidy award averages rather than overall subsidy award average.
- Calculation resulted in no building block request for FY 13.

3. We recommend that DCFS report annually to the Legislature on historical trends in the percent of adoptions that are disrupted, and whether the cause of those disruptions was insufficient adoption subsidy assistance.

   IN PROCESS

   - Historical data on adoption disruptions through FY 11 has been compiled.
   - A case by case analysis is being conducted to analyze if it can be determined the extent to which insufficient subsidy is the cause of the disruption. Analysis will be completed by March 2012.

4. We recommend that DCFS equalize adoption assistance funding among its five regions according to performance metrics that support its adoption program objectives.

   IN PROCESS

   - Region adoption assistance financial information has been compiled, both on an average per case basis and on total allocation for each region.
   - Adoption data for FY 11 and estimated numbers of adoptions for FY 12 have been obtained.
   - Next steps include review of data (performance metrics) associated with adoptions and analysis of inequities in funding. This will be completed by February 2012.
   - Preliminary discussions have been held on process for reallocation of funds based on performance metrics.
   - Funding adjustments will be considered for FY 12 and will be fully implemented in FY 13.