

GAO

Report to the Subcommittee on the  
District of Columbia, Committee on  
Government Reform, House of  
Representatives

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December 2000

# DISTRICT OF COLUMBIA CHILD WELFARE

## Long-Term Challenges to Ensuring Children's Well-Being



Accountability \* Integrity \* Reliability

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**Abbreviations**

AFDC	Aid to Families with Dependent Children
ASFA	Adoption and Safe Families Act of 1997
CFSA	Child and Family Services Agency
CSS	Court Social Services
DHS	Department of Human Services
HHS	Department of Health and Human Services
ICPC	Interstate Compact for the Placement of Children
MFO	modified final order
MIS	Management Information System
MPD	Metropolitan Police Department
MSW	Master of Social Work
OCC	Office of Corporation Counsel
SACWIS	Statewide Automated Child Welfare Information System



United States General Accounting Office  
Washington, D.C. 20548

December 29, 2000

The Honorable Tom Davis  
Chairman  
The Honorable Eleanor Holmes Norton  
Ranking Minority Member  
Subcommittee on the District of Columbia  
Committee on Government Reform  
House of Representatives

Many children in the District of Columbia, like those in other jurisdictions across the country, have lived at risk of abuse and neglect. Once in the care of the District's child welfare system, many have languished there for extended periods of time. Years of indifference, managerial shortcomings, and long-standing organizational divisiveness constrained the system's ability to keep children safe. As a result of these prolonged deficiencies, the U.S. District Court for the District of Columbia issued a remedial order in 1991 to improve the performance of the child welfare agency and, lacking sufficient evidence of program improvement, later removed the agency from the District's Department of Human Services (DHS) and placed it in receivership in 1995.<sup>1</sup> Under a modified final order (MFO) established by that court, the receiver of the Child and Family Services Agency (CFSA) was directed to comply with more than a hundred policy and procedural requirements. These requirements include steps for improving protective services; services to children and families; and the placement, supervision, and review of children in foster care. On October 23, 2000, the court signed a consent order that outlines a process to terminate the receivership upon the satisfaction of certain specified conditions.<sup>2</sup>

Prompted in part by the death in January 2000 of a toddler who had been in the care of the child welfare agency, you asked us to assess the progress the receiver appointed in October 1997 had made in complying with the requirements of the MFO and other critical elements that are important to facilitating needed reforms. In May 2000, we testified on our initial observations of the agency's efforts to achieve compliance with the MFO

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<sup>1</sup>The agency was known in 1991 as the Child and Family Services Division of the District of Columbia's Department of Human Services. A receivership is an arrangement in which a court appoints a person to temporarily manage a local agency with broad authority to ensure full compliance with the court order in an expeditious manner.

<sup>2</sup>LaShawn A. v. Anthony Williams, Consent Order, C.A. No. 89-1754, October 23, 2000.

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and related systemwide issues.<sup>3</sup> Subsequently, you asked us to conduct more in-depth work to examine (1) how financial and operational changes made by CFSA to comply with the MFO have affected the protection of children and the provision of services to children and families, (2) the extent to which critical elements of an effective child welfare system have been applied in the District, and (3) issues that need to be addressed in planning for the transfer of CFSA back to local governance.

In conducting this work, we interviewed a variety of key participants in the District's child welfare system, including the receiver, CFSA managers and staff, and other District of Columbia officials, as well as child welfare experts affiliated with other organizations. We also obtained and analyzed information from CFSA to document the extent to which it has complied with key provisions of the MFO. In addition, we reviewed reports and evaluations that examined CFSA's performance and key challenges facing the District's child welfare system. We conducted our work between March and October 2000 in accordance with generally accepted government auditing standards. (A more detailed discussion of our scope and methodology appears in appendix I.)

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## Results in Brief

The receiver has undertaken financial and operational changes in an effort to comply with the MFO and improve children's well-being by addressing management and programmatic needs. These changes include initiatives to recruit and train qualified social workers, develop policies and procedures to guide service delivery to children and families, establish and enhance organizational components, and develop a new automated information system. However, the implementation of these management and programmatic changes has not resulted in significant improvements in the protection of children and the provision of other child welfare services. For example, children in the District's care remain in the system for an average of 3.7 years, which far exceeds the federally mandated goal of 12 months. In addition, inadequate efforts to retain staff have contributed to caseloads that exceed the maximum caseloads allowed by the MFO and have impaired the ability of social workers to perform critical services, such as visiting children to ensure their safety and the adequacy of their care and making referrals to other support services.

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<sup>3</sup>*Foster Care: Status of the District of Columbia's Child Welfare System Reform Efforts* (GAO/T-HEHS-00-109, May 5, 2000).

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Our previous work has shown that critical elements of an effective child welfare system include collaborative operations among the agencies that provide child welfare-related services to children and families and “case-specific” initiatives that aim to bring together children, family members, social workers, attorneys, and others to help address the needs of a specific child and family. Although the District has begun efforts to integrate child welfare services with other support services, its child welfare system still lacks a fully developed collaborative structure to help foster more efficient day-to-day operations and improve program accountability. To address case-specific needs, some entities in the child welfare system have initiated projects of limited scope. For example, the District of Columbia Superior Court instituted a mediation pilot that is designed to involve relatives in making important decisions regarding children’s care, and two neighborhood collaboratives began family case conferencing practices to address circumstances that undermine family stability.

Beyond expanding efforts at collaboration, District officials also identified several other key factors that need to be addressed before CFSA can be transferred back to local governance. These factors include ensuring adequate staffing and elevating CFSA to a cabinet-level agency within the District government to provide for greater independence in setting priorities and obtaining resources. District officials and child welfare experts placed high priority on developing a transition plan that incorporates these issues, because the District’s child welfare system continues to face significant challenges despite the changes initiated by the receiver and first steps the District has taken to foster systemwide collaboration. An emergency reform plan prepared at the request of this subcommittee on October 4, 2000, and a consent order issued on October 23, 2000, by the U.S. District Court for the District of Columbia will significantly influence the pending transfer of CFSA to local governance. Among other priorities, both call for establishing CFSA as a cabinet-level agency and providing sufficient legal support for children in the agency’s care. While the court-mandated requirements provide a framework for addressing longstanding structural and operational challenges, a long-term commitment from the Mayor and District government will also be necessary to develop the child welfare system’s capacity to protect children. In its comments on a draft of this report, CFSA found it to be balanced, noting clarifications that we have incorporated where appropriate.

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## Background

The appointment of a child welfare receivership began with the filing of a class action in 1989 on behalf of abused and neglected children in the District of Columbia. The U.S. District Court trial and subsequent opinions documented many shortcomings within the child welfare system and led to a finding of liability on the part of the District. For example, the court found that as a result of inept management and the indifference of the mayor's administration, the District had failed to comply with reasonable professional standards in almost every area of its child welfare system. Specifically, the court found that the District had failed to investigate reports of neglect or abuse in a timely manner, make appropriate placements for children who entered the child welfare system, monitor their care, or adequately ensure that they had permanent homes. Court documents traced these failures to staffing and resource problems—namely, staff shortages, inconsistent application of policies and procedures, and an inadequate automated system to track the placement and status of children in the District's care. A remedial action plan was developed jointly by the plaintiffs and the defendants in the class action, and that plan led to the development of the MFO in January 1994. The MFO includes more than a hundred policy, procedural, and data requirements with which the agency must comply. These requirements include steps for improving protective services; services to children and families; and the placement, supervision, and review of children in foster care (app. II provides a summary of selected requirements). In 1995, the court, lacking sufficient evidence of program improvement, removed the agency from DHS and placed it in full receivership. Since then, the court has twice appointed a receiver to manage the child welfare agency's efforts to institute the changes outlined in the MFO. The first receiver served from August 1995 through June 1997. Not finding improvements in the child welfare program, the court appointed a second receiver in 1997, who served through November 30, 2000. The court appointed the deputy receiver for programs to serve as interim receiver effective November 30, 2000.

The receiver appointed in 1997 primarily focused on changes to the organization's infrastructure, such as enhancing personnel management and implementing a new management information system, as we reported in our previous testimony. Additionally, in February 2000, CFSA consolidated functions that had been dispersed at seven locations throughout the city and co-located almost all staff into the same building (see the CFSA organization chart in app. III). CFSA has also taken steps to create new organizational roles or units to fulfill specific responsibilities.

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For example, in 1998, the receiver hired specialists in child care, housing, education, and substance abuse, who act as “internal consultants” by sharing their expertise with social workers and interacting with other District agencies. The substance abuse specialist, for example, identifies and locates services in the community that meet the needs of the population of children in CFSA’s care.

CFSA provides a range of child welfare services from the time children enter the system until they reach permanent stable care arrangements. Specifically, the Intake Administration oversees the process by which children enter the system. After intake, children are served by a number of different programs, depending on the setting in which they are placed once they are removed from their home, such as traditional foster care, kinship care, and adoptions. Other program areas provide special services, such as the Teen Services Division, which focuses on adolescents in care by, for example, helping to prepare them to live independently as adults, and the Family Services Division, which addresses the needs of families when a determination has been made that a child can safely remain at home. Health Services, through a program called D.C. KIDS that was established in October 1999, provides for initial physical and mental health screenings and for continuing medical care.

In recent years, the number of children receiving such services has increased, while the number of social workers has declined. Although the agency serves children in a variety of settings, in December 1997, 2 months after the appointment of the second receiver, there were approximately 2,900 children in foster care; at that time, there were 289 social workers on board providing a broad array of services in agency programs, such as kinship care, foster care, and adoptions.<sup>4</sup> As of August 31, 2000, there were about 3,271 children in foster care, and the agency employed 241 social workers.<sup>5</sup> To provide services to children, CFSA had a budget in fiscal year 2000 of \$147 million, almost one-third of which was federal child welfare

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<sup>4</sup>These data do not include social work aides and trainees who can assist social workers in their duties.

<sup>5</sup>These data do not include social work aides and trainees who can assist social workers in their duties. As of August 31, 2000, CFSA had 677 employees.

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funding.<sup>6</sup> The MFO requires CFSA to maximize its use of several federal funding sources, including title IV-E and Medicaid, and it has taken steps to increase the receipt of such funding. CFSA has requested an increase of \$37 million for fiscal year 2001, for a total budget of \$184 million, which according to some agency officials is the first budget that will fully support their efforts to comply with the MFO.

CFSA operates in a complex child welfare system. Although it provided many services directly, in fiscal year 2000, about 57 percent of all agency expenditures were spent on contracted services. For example, contracts provide for placements of children in group homes as well as some foster homes and other facilities. The agency spends about \$6.2 million annually on eight Healthy Families/Thriving Communities collaboratives, nonprofits that provide neighborhood-based support services to stabilize families so that fewer children enter the child welfare system. CFSA also works with a consortium of 22 private agencies to place children in foster and adoptive homes.<sup>7</sup> In addition, CFSA relies on services provided by other District government agencies. For example, both the Fire Department and the Health Department inspect facilities where children are placed; D.C. Public Schools prepares individual education plans for children in care; and the D.C. Interstate Compact office in the Department of Human Services has responsibility for working with CFSA and other states to process the interstate placement of children.<sup>8</sup> To process cases through the court system, CFSA interacts with 59 D.C. Superior Court judges, each of whom has responsibility for a share of the child abuse and neglect caseload. Under District of Columbia law, while CFSA has primary responsibility for

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<sup>6</sup>Federal funding is primarily authorized under title IV-E of the Social Security Act, which reimburses states for a portion of out-of-home care costs for children under the Aid to Families with Dependent Children (AFDC) program. Although legislation passed in 1996 eliminated the AFDC program, children who meet the 1996 eligibility criteria for AFDC continue to be eligible for title IV-E assistance.

<sup>7</sup>Consortium members include agencies like Lutheran Social Services, Catholic Charities, and For Love of Children.

<sup>8</sup>The Interstate Compact for the Placement of Children (ICPC) is essentially a uniform law, enacted in all 50 states, the District of Columbia, and the U.S. Virgin Islands, that governs the interstate placement of children in foster and adoptive homes. Under ICPC, the state from which a child is sent retains jurisdiction over the child and his or her placement. Each state must, however, provide the other with information sufficient to ensure that a placement is appropriate and in the best interest of the child. Although this report discusses the District's role in the ICPC process, we use "interstate placement" to refer to placements outside District boundaries.

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investigating neglect cases, the Metropolitan Police Department (MPD) has primary responsibility for investigating abuse cases.<sup>9</sup> This arrangement, known as “bifurcation,” is unique among child welfare systems nationwide. Following MPD investigation, the office of Court Social Services (CSS) of the District’s Superior Court provides oversight and management of these abuse cases, which totaled about 600 in July 2000. In abuse cases in which a child cannot be returned home and no relative can be found, CSS transfers the case to CFSA.

In addition to complying with the provisions of the MFO and District law, CFSA must comply with applicable federal laws, including the Adoption and Safe Families Act of 1997 (ASFA), which placed new responsibilities on all child welfare agencies nationwide. The act introduces new time periods for moving children toward permanent stable care arrangements and penalties for noncompliance. For example, it requires states to hold a permanency planning hearing no later than 12 months after the child is considered to have entered foster care.

In an effort to provide for greater accountability among court-appointed receivers in the District, including the child welfare receiver, the Congress passed and the President signed in October 2000 the District of Columbia Receivership Accountability Act of 2000 (Pub. L. No. 106-397). The act provides for increased oversight and accountability of receivership performance. The act specifies several approaches for enhancing oversight, including periodic fiscal, management, and program audits, that are intended to strengthen the structure of accountability for District government programs.

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## Receiver’s Changes Had Limited Effect on Children’s Well-being

Since 1997, the receiver introduced management and programmatic changes intended to meet the requirements of the MFO and to improve child welfare outcomes in the District. These changes include initiatives to recruit and train qualified social workers, provide additional funding for community-based services, establish and enhance organizational components, and develop a new automated system. The implementation of these efforts has fallen short of expected results, and these efforts have had a limited effect on CFSA’s ability to provide needed child welfare services to enhance children’s well-being and guide their progress toward

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<sup>9</sup>D.C. Code Ann. 6-2104. The MFO requires CFSA to conduct joint investigations with MPD.

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permanent stable care arrangements. For example, although many new staff have been hired, some had not yet been assigned caseloads because of delays in obtaining professional social work licenses. As a result of such delays and inadequate efforts to retain staff and maintain adequate staffing levels, caseloads remain above standards defined in the MFO. This impairs social workers' ability to perform critical casework functions, such as visiting children to ensure their safety and adequacy of care, preparing court reports, and investigating cases within designated time periods. Likewise, CFSA issued a policy handbook in 1995 to which it has made numerous revisions. While a recent effort to include these policies in the agency's automated system may improve staff access to them, many staff told us that they have lacked consistent direction in how to implement policies during the course of their work. Moreover, the policy handbook and subsequent revisions do not yet include policies covering all requirements of the MFO. In addition, CFSA's new automated system—FACES—lacks complete case information, and social workers have not fully used it in conducting their daily case work.<sup>10</sup>

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### Changes in Key Management Requirements Fall Short of Expected Results

In response to management-related requirements contained in the MFO, the receiver undertook changes in areas such as recruitment and retention, training, social worker caseload reduction, the development of policies and procedures, and the implementation of a new automated information system. However, these changes have generally fallen short of expected results. (See app. II for an assessment of CFSA's compliance with selected provisions of the MFO.)

### Recruitment, Retention, and Training Activities

Problems with the recruitment and retention of qualified social workers preceded the receivership. Recognizing these challenges, the MFO required CFSA to improve recruitment efforts and hire a sufficient number of social workers who had obtained Master of Social Work (MSW) degrees.<sup>11</sup>

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<sup>10</sup>An agencywide contest provided the name for the information system.

<sup>11</sup>In order to carry cases, social workers with an MSW must also obtain professional social work licenses. One factor that delayed the immediate deployment of social workers upon their being hired was a prolonged licensing process. Some newly hired social workers we spoke to said that they had been on the job for periods ranging from 3 to 5 months before receiving their licenses. The Deputy Mayor for Children, Youth, and Families announced in September 2000 that the Mayor had signed an order allowing the District to automatically recognize licenses granted by other states as one way to expedite licensing for some new hires.

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Following recent recruitment efforts, CFSA hired 56 social workers between March and June 2000, which represented 80 percent of its goal of 70 new hires for that period.<sup>12</sup> This hiring activity resulted from recruitment efforts that included obtaining independent hiring authority in October 1999, developing a recruitment plan in March 2000, conducting several job fairs, raising salaries, and offering additional recruitment incentives.

The retention of qualified social workers, however, has been a constant challenge for CFSA. To help the agency maintain a stable workforce, the MFO required it to develop a retention plan. As of August 2000, CFSA had created a retention committee that meets periodically and reports to the receiver, but it has not developed an agencywide retention plan. The agency continues to experience a fluctuating yet significant loss of social workers. CFSA staff estimated that in 1997, the first year of the receiver's term, the agency lost about 15 social workers per month. While CFSA officials stated that this rate had declined by June 2000 to about four or five social workers per month, attrition continues to be a significant issue.<sup>13</sup> Overall, according to a CFSA official's estimate, the agency lost about one-third of its social workers between January 1999 and July 2000.

While attrition is high in many other child welfare agencies across the country, turnover among social workers in the District is explained in large part by unmanageable workloads and the availability of better-paying jobs with other District agencies and the private sector, according to CFSA officials and staff. Furthermore, according to CFSA's analysis of interviews with staff who left the agency, some social workers cited the quality of supervision as a reason for their decision to resign.<sup>14</sup> CFSA officials noted that the creation of a social worker associate position at the Bachelor's of

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<sup>12</sup>Before CFSA obtained independent hiring authority in October 1999, it could not conduct direct recruitment and had to depend on the District's Office of Personnel to refer candidates to fill positions. According to CFSA human resources officials, the agency received only 10 to 15 referrals of job candidates each year from DHS before CFSA obtained its independent hiring authority. CFSA officials believed the agency would comply with the MFO with 60 new hires.

<sup>13</sup>Agency data for June, July, and August 2000 show that CFSA lost between five and nine social workers each month.

<sup>14</sup>CFSA officials indicated that two new initiatives—the conversion of all agency management and supervisory employees from career service to the District government's Management and Supervisory Service and the development of a new agency performance appraisal system—could enhance accountability for management and supervisory employees.

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Social Work level could help agency retention efforts by providing more flexibility in assigning such workers to deliver some MFO-required services.

High turnover adversely affects CFSA's capacity to effectively manage the provision of services to children and families. According to CFSA staff, the agency is losing many of its more experienced social workers, whereas the new hires selected to replace these workers and to help CFSA attain more desirable staffing levels face a significant learning curve. New hires, senior social workers, and supervisors we spoke with also cited casework problems associated with high turnover, such as delays that result when social workers resign and cases previously assigned to them need certain actions, including transfer to another program area. New hires also stated that once on the job, they were assigned cases previously handled by others that lacked sufficient case data, forcing them to spend extra time to recreate the data and learn the case history. Additionally, high turnover results in the assignment of a succession of social workers to the case of a child in CFSA's care, furthering instability in the lives of these children.

The MFO also required CFSA to establish a full-time training unit and to provide minimum requirements for training new hires and ongoing training for more senior workers. While CFSA has met these requirements, casework priorities often lead to low attendance at training sessions. In response to these requirements, the agency initially conducted a needs assessment to plan the development of the training unit. Until the training unit was established, an administrator and a trainer provided or obtained training for agency employees. In January 1999, CFSA established the training unit through a contract with Virginia Commonwealth University to provide training to agency social workers beginning in February 1999.<sup>15</sup> The university has developed a training course for new hires, which provides the 80 hours the MFO requires, and a curriculum of about 30 courses, from which more senior staff can choose classes to meet the continuing education requirements of the MFO. The training program director reported that between May and October 2000, 54 of 72 new hires completed their initial training.<sup>16</sup> Additional training has been provided in areas such as preparing for court appearances and meeting ASFA requirements.

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<sup>15</sup>The contract is supported by subcontracts with Howard University and Catholic University of America.

<sup>16</sup>Additionally, the training program director stated that 212 CFSA staff with casework responsibilities received some form of training between May and October 2000.

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Staff we interviewed expressed a variety of views on the quality of training. For example, some new hires who had recently earned their MSWs stated that they found portions of the new-hire training to be elementary or insufficiently tailored to their case management duties at CFSA. In addition, staff at all levels stated that they wanted additional training in how to assess the risks a child faces at home to determine whether removal is necessary, as well as additional training in agency policies and procedures. CFSA officials stated that risk assessment training has been offered to intake workers several times but cancelled for poor attendance. CFSA officials and social workers stated that casework priorities often result in low attendance at classes, which leads to either course cancellations or rescheduling trainers. CFSA incurs additional training costs that range from \$500 to \$800 per day for rescheduled classes.

In addition, the MFO required CFSA to assess whether staff satisfactorily master the course content. CFSA lacks such methods, although the agency hired a curriculum specialist in September 2000 to develop methods for evaluating the extent to which social workers apply training content to the work they perform.

## Caseload Reduction

The MFO established caseload limits to help social workers respond to the service needs of children and families. Although CFSA has achieved these caseload levels in some program areas, the caseloads CFSA reported for other areas remain significantly above the maximum caseloads allowed by the MFO, limiting social workers' ability to meet the needs of children and families. For each program area, table 1 identifies staffing levels, caseloads per staff required by the MFO, and average caseloads carried by CFSA social workers in teams in each program area as of July 2000. As the table shows, social workers were carrying actual average caseloads that exceeded the MFO limits in 6 of 10 CFSA programs. For example, workers in the traditional foster care program were carrying average caseloads that ranged from 13 to 55, compared with the MFO limit of 16. Moreover, eight of the agency's nine traditional foster care teams had average worker caseloads that exceeded this limit.

**Table 1: Modified Final Order and Actual Caseloads, July 2000**

	Number of social workers	Average caseload range <sup>a</sup>	MFO caseload limit
<b>Intake investigations</b>	47	6-26	12
<b>Kinship care<sup>b</sup></b>	45	3-33	17
<b>Family services</b>			
In-home	40	10-17	17
Intensive family services	10	2-4	4
<b>Permanency and placement</b>			
Teen services	13	20-34	16
Teen life options	5	19 <sup>c</sup>	12
Traditional foster care <sup>b,d</sup>	36	13-55	16
Adoptions	34	10-21	12
Adoption home studies	5	16 <sup>c</sup>	30
Family resources	9	25 <sup>e</sup>	30
<b>Total</b>	<b>244</b>		

Note: The definition of case varies, depending on the service provided. For example, in traditional foster care and adoptions, each child constitutes a case. In intake, a case is an investigation; in family services, each family is a case; and in adoption home studies, a case is a prospective adoptive home. In September 2000, the receiver announced plans to hire 22 additional social workers. As a result, actual caseloads carried by social workers since then may vary from these data.

<sup>a</sup>CFSA reported average caseloads carried per worker by team (or "section") in each program area. A team typically consists of five social workers. The data reflect the range of average caseloads carried by workers in each team. Of the seven case-carrying teams in intake, four exceeded the MFO caseload limit; seven of ten kinship teams exceeded the limit; all three teen services teams exceeded the limit, as did the teen life options team; eight of nine traditional foster care teams exceeded the limit; and five of seven adoptions teams exceeded the limit.

<sup>b</sup>Taken together, the kinship and traditional foster care programs account for about two-thirds of the children in CFSA's care, according to CFSA officials.

<sup>c</sup>Data reflect average caseloads for one team in these areas.

<sup>d</sup>In foster care, children are placed with foster families after being removed from the home. CFSA uses "traditional" to distinguish this form of care from "therapeutic foster care," a form of foster care for children who have special needs. Contractors handle CFSA's therapeutic foster care program.

<sup>e</sup>Data reflect two teams, each reporting an average caseload of 25.

Source: CFSA.

Moreover, average caseloads may understate the caseloads actually carried by some social workers. Social workers we spoke to consistently described their caseloads as overwhelming and unmanageable. To illustrate the effect of high caseloads, a senior social worker, also in traditional foster care, told us that his caseload included responsibility for 44 children. He described

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the following duties that he must fulfill to meet the needs of these children and their families: He must prepare 44 case plans, assess the needs of 44 children and make appropriate referrals, attend the court hearings for these cases, participate in internal reviews of these cases, and ensure appropriate placements in 44 different schools, among other activities. In addition, the social worker is responsible for obtaining a variety of goods and services, including clothing, transportation, health and mental health services, and mentoring services.

Caseloads that exceed prescribed limits have several effects. For example, supervisors reported that they sometimes must carry cases. This practice not only violates an MFO requirement that supervisors not carry cases; it also limits their ability to provide effective supervision. Yet, CFSA data as of June 2000 showed 25 supervisory staff carrying the cases of 129 children. High caseloads also have a very direct effect on the availability and level of CFSA oversight of the children in its care. Specifically, social workers reported that when caseloads are high, certain other activities assume a lower priority. Among these are providing referrals so that children can obtain needed services, conducting required visits to assess children's progress in their placements, and entering data in the management information system.

Finally, social workers we spoke to acknowledged that high caseloads also lengthen the time required to process cases, and they contribute to difficulties in moving children to permanency without delay. According to a report prepared for the Deputy Mayor for Children, Youth, and Families, children still spend an average of 3.7 years in the District's child welfare system.<sup>17</sup> In this environment, these time periods jeopardize the District's ability to comply with ASFA's requirement that children reach permanency within 12 months, according to District Superior Court officials.

## Policies and Procedures Development

The MFO required CFSA to develop policies and procedures covering 28 key child welfare program areas, including conducting timely investigations, providing needed services, developing performance-based contracting, appropriately placing children and achieving permanency for

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<sup>17</sup>Carolyn N. Graham and Kennedy Khabo, *The District of Columbia Safe Passages to Permanency Initiative* (Washington, D.C.: Office of the Deputy Mayor for Children, Youth, and Families, Oct. 1999).

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them, and managing social worker caseloads.<sup>18</sup> The agency issued policies in a 1995 handbook. Since then, these policies have been revised by changes communicated through “circular letters” that provided draft updates to specific policies and procedures and direction that varied from supervisor to supervisor. As a result, staff expressed confusion over how to achieve consistent implementation of agency policies. Moreover, agency policies do not cover all court-mandated requirements contained in the MFO. Additionally, until October 2000, CFSA had assigned only one worker to coordinate the development of draft policies.

Even though policies have been in place, CFSA staff told us they have not been completely clear or useful in carrying out their work. Uncertainty over CFSA’s policies constrained supervisors’ ability to communicate priorities and direct the work of social workers under their supervision, and in some cases, social workers expressed a reluctance to seek guidance from their supervisor because they felt their supervisor lacked sufficient knowledge. Finally, staff we interviewed said that, as a result, CFSA’s ability to work effectively with other key child welfare partners was constrained. For example, according to a CFSA official, the lack of clear and consistent policies created uncertainty regarding how social workers should respond to directives from the District’s Superior Court regarding the preparation of court-mandated reports, appearances at court hearings, and other legal matters. Even though policies are now available through FACES, CFSA staff indicated that social workers will still need to seek supervisory guidance to clarify and implement them consistently.

CFSA officials demonstrated the approved policies and procedures manual feature of the automated information system to GAO in October 2000.<sup>19</sup> While the policies and procedures appeared to be at least as comprehensive as earlier policies, it is too early to say how staff will rely on this new feature to obtain consistent direction to their work. However, CFSA officials stated that social workers will receive training on using the automated policies and can contact CFSA’s Office of Planning, Policy, and Program Support to obtain clarification on specific policy implementation.

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<sup>18</sup> App. II lists these policy requirements and identifies the extent to which CFSA has begun to draft policies corresponding to each mandate.

<sup>19</sup>The feature is available through the system’s “Help” menu and provides an index and search capability.

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## New Automated Information System

The MFO required CFSA to develop an automated information system to permit the agency to comply with the provisions of the MFO and with District law. On October 1, 1999, CFSA implemented the FACES system, adapted from systems previously implemented in Oklahoma and West Virginia, at a cost of about \$20 million.<sup>20</sup> While additional modifications or enhancements could be made, CFSA considers the system fully implemented and available for staff use. According to the system administrator, several factors contributed to system design: the requirements of federal law, compliance with the provisions of the MFO, and input from a team of 70 “end users” consisting of staff from various program areas throughout the agency. While CFSA officials believe FACES will comply with federal requirements, it cannot produce all the reports the MFO required.<sup>21</sup> For example, CFSA reported that FACES could not produce reports on the timeliness of administrative reviews and could not generate certain placement data as specified by the MFO.<sup>22</sup>

CFSA staff also do not fully use the system. Staff across the agency noted that they continue to use spreadsheets or databases outside of FACES.<sup>23</sup> The system administrator expressed concerns about the completeness of the data in FACES—and, therefore, its validity—noting that incomplete data entry undermines the purpose for which the system was designed. She described FACES as a tool that supports case practice and allows social workers and supervisors to track cases, assess risks to children, control vendor payments, and assess contractor performance. The system can also document actions social workers perform during a case’s entire history. To the extent that timely and complete data entry is not achieved, however, the agency’s ability to track its entire caseload is compromised. In part, this low usage stems from the lack of case data entry into the system by social workers. For example, CFSA officials estimated that as of September 2000,

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<sup>20</sup>Included in this cost is \$10 million in federal funding.

<sup>21</sup>System officials stated that the federal Statewide Automated Child Welfare Information System (SACWIS) compliance visit took place in June 2000. CFSA officials expected that the federal Department of Health and Human Services (HHS) would provide a draft of its review in December 2000.

<sup>22</sup>Federal law and the MFO require an administrative review every 6 months of the progress toward permanency and the achievement of case plan goals for all children in foster care.

<sup>23</sup>For example, staff in administrative review, adoptions, placement, and monitoring said that they maintain data outside FACES. System staff believe that FACES could accommodate some of these functions and said that they have begun to discuss with staff in certain program areas how such data could be included in FACES.

across all programs, about half of all case plans had been entered into FACES; however, Superior Court judges and a court official we spoke to believe that this estimate may overstate the actual rate of data entry. CFSA officials also noted that the percentage of data entered in the system varies by program area, as shown in table 2.

**Table 2: The Percentage of Case Plans Entered in FACES, September 2000**

Program area	Percentage of case plans entered
Intake <sup>a</sup>	100
Adoptions	70
Family services	65
Teen services	60
Traditional foster care	42
Kinship care	35

Note: Together, kinship and traditional foster care account for about two-thirds of all children in CFSA's care, according to CFSA officials.

<sup>a</sup>Intake workers are responsible for creating cases in FACES and for entering data that support the case plan, such as legal information, family demographics, and contact notes. Because a case cannot be transferred to another program area if these data are left blank, CFSA officials stated that 100 percent of these data are entered as new cases are created. However, CFSA officials estimated that 70 percent of the cases that remain in intake for more than 30 days have been entered in the system.

Source: CFSA.

The system administrator identified several possible reasons why social workers might not be entering complete data into FACES: a lack of comfort with learning new technology and a “cultural” preference for paper documents among child welfare practitioners, a lack of knowledge among staff about the system’s capabilities, supervisors’ decisions to allow social workers to continue using paper, and insufficient time to use the system because of other case priorities. Social workers also said that when caseloads become difficult to manage, other activities like data entry assume a lower priority.

Finally, FACES is not yet well linked with systems in other agencies.<sup>24</sup> Existing linkages with other agencies are limited and do not include key participants in the child welfare system, such as MPD, CSS, Office of

<sup>24</sup>In this context, “linked with” means “able to access” FACES or FACES data from a remote location.

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Corporation Counsel (OCC), D.C. Superior Court, and D.C. KIDS.<sup>25</sup> Officials in some of these agencies expressed a desire for access to FACES to track children in the child welfare system and report more complete case information in support of District efforts to obtain additional federal funds. In July 2000, the CFSA System Administrator noted that the agency's 2001 budget provides for limited linkages with OCC, CSS, and MPD and a full FACES interface with D.C. KIDS. However, implementation priority to date has focused on rolling out the system within CFSA.

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## Changes in Key Program-Related Areas Also Fail to Meet Established Goals

In addition to requirements that address human resources and caseloads, the MFO imposed program requirements on CFSA in a number of areas, ranging from intake and assessment to efforts to provide children with permanent placements. Despite progress in some areas, CFSA still faces challenges in meeting the terms of the court order. In particular, the agency has not met certain MFO time periods for initiating and completing investigations. While the agency has begun to address its need for additional homes and facilities, it continues to place children in settings prohibited by the MFO, such as homes without current licenses and homes with more children in their care than their licenses permit. Additionally, CFSA has not consistently met MFO requirements regarding the provision of ongoing support services to children once they are placed, and its oversight of contractors' service delivery is limited. Moreover, while the agency has added staff to process the cases of children placed outside the District without proper documentation, a large backlog of these cases remains. Finally, despite MFO requirements to expedite the process by which children move into permanent, stable care arrangements, children still spend an average of 3.7 years in the system.

### Intake and Assessment

The court order mandated certain time periods to expedite the process by which children enter the child welfare system. For example, it required that investigations be initiated within 48 hours of the receipt of the abuse or neglect report and completed within 30 days of the report. District law exceeds the MFO requirement and requires that the initial investigation be

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<sup>25</sup>CFSA exchanges data with the Income Maintenance Administration and has system linkages with the Office of Early Childhood Development, some of the Healthy Families/Thriving Communities collaboratives, and 22 private consortium agencies (a group that includes Lutheran Social Services, Catholic Charities, For Love of Children, and others).

initiated within 24 hours of the report.<sup>26</sup> As shown in table 3, CFSA has had great difficulty meeting these requirements. For example, roughly one-third of all cases referred for investigation since October 1999 were not initiated within 24 hours of the report and CFSA failed to complete investigations within 30 days on about half of them.

**Table 3: Cases Referred to Investigation, October 1999 to July 2000**

	Total number	Not completed within time period	Completed within time period	Rate not completed within time period
Investigations initiated within 24 hours	2,586	954	1,632	37%
Investigations completed within 30 days <sup>a</sup>	2,894	1,495	1,399	52%

Note: Investigations include child neglect cases investigated by CFSA and child abuse cases investigated by MPD. An investigation constitutes cases in which every member of the household under investigation has been interviewed, according to CFSA officials.

<sup>a</sup>These numbers refer to cases undergoing investigation between October 1999 and July 2000. However, the total number of cases is higher than that for cases initiated within 24 hours because 308 of these investigations were begun before October 1999.

Source: CFSA.

CFSA has made some progress in reducing the backlog of cases for which investigations had not been completed within 30 days. An intake official recently reported that the backlog of incomplete neglect investigations had been significantly reduced and that only 30 incomplete investigations remained as of August 2000. Beginning in June 2000, CFSA set a unit of recently hired intake workers to helping the MPD reduce its own backlog that had not met the 30-day time period from 177 cases to 64 cases. However, intake officials acknowledged continuing difficulties in meeting both the 24-hour and the 30-day time periods. Intake officials cited staff turnover as one explanation. CFSA lost about 26 percent of its intake workers in 1999. Intake officials believe they will be able to comply with both time periods if the agency is fully staffed, and they cited the succes

<sup>26</sup>D.C. Code Ann. 6-2102 and 6-2103.

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that new intake workers had in reducing the backlogs in July 2000 as one example of their ability to comply, given additional staff.

The MFO also required joint investigations of abuse cases by CFSA social workers and police officers and mandated that CFSA develop policy to guide such joint activities. While CFSA reported that 562 joint investigations were conducted in fiscal year 2000, joint investigations are not yet routine.<sup>27</sup> For example, CFSA and MPD officials agree that this number refers to investigations in which CFSA and MPD staff collaborated in some way on a case. The number of cases in which CFSA and MPD jointly visited families to conduct investigations is much lower, and the officials could not provide a concrete number. While CFSA and MPD officials developed a protocol for working together in September 2000, the lack of available staff in both agencies is likely to continue to limit their ability to conduct joint investigations.

#### Opportunities for Placing Children in Foster, Adoptive, and Group Homes

The MFO addressed the placement of children by requiring that CFSA prepare a needs assessment and development plan to identify more placement opportunities in additional foster, adoptive, and group homes and other facilities. The MFO also prohibited placing children in settings considered harmful to them, such as placing children younger than 6 in group homes.<sup>28</sup> While CFSA has not developed a resource development plan per se, the agency's strategic plan for fiscal year 2000 identified goals for developing more foster and adoptive homes, for example, and included time periods and specific steps to be taken. This plan had not yet been updated by October 2000.

Social workers we spoke to emphasized that the development of additional capacity in foster and adoptive homes is crucial if children are to be appropriately placed in a timely manner. CFSA staff also cited a shortage of group homes, noting that 76 placement slots have been lost because of the

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<sup>27</sup>Overall, MPD investigated more than 2,000 abuse cases each year for the past 3 years. The Safe Shores D.C. Children's Advocacy Center, a nonprofit organization in partnership with District and federal government agencies, coordinates the work of an interagency multidisciplinary team to investigate allegations of child physical and sexual abuse. The Center has both a CFSA liaison and MPD officers on site to facilitate joint responses to case referrals.

<sup>28</sup>The MFO exempts from this prohibition children who have exceptional needs that cannot be met by any other type of care.

recent closing of several group homes.<sup>29</sup> Finally, social workers noted that the supply shortage is especially acute for emergency care facilities, infant care facilities, and homes for large sibling groups.

CFSA's difficulties in securing appropriate placement facilities are illustrated by the fact that CFSA has placed children in facilities that lack current licenses, facilities where the number of children exceeds the number permitted by the license, and inappropriate facilities—all practices prohibited by the MFO.<sup>30</sup> For example, as shown in table 4, in July 2000, CFSA reported that 62 children younger than 6 were residing in congregate care or group homes for as long as 3 months to almost 2 years. A national child welfare expert described such placements as very harmful to young children.

**Table 4: Children Placed in Settings Prohibited by the MFO, July 2000**

Type of setting	Number of children	Number of facilities
Homes without current licenses	147	81
Homes with more children than allowed by license	25	20
Group homes with children younger than 6	62	5

Source: CFSA.

The lack of placement options has also led to extended stays by children in CFSA's on-site "respite center," which was not designed for overnight care. CFSA staff confirmed that the respite center has been used to place children on an emergency basis for several days at a time.

Recognizing the need to develop new placement capacity, CFSA has taken some recent steps to do so, but the effects of these activities are not yet known. Moreover, several officials we spoke to agreed on the need for a comprehensive analysis of needs, matched with an analysis of existing

<sup>29</sup>As of September 2000, CFSA had slots for 297 children in 17 group homes.

<sup>30</sup>In October 2000, the receiver said that in most cases homes without current licenses reflect expired medical information not updated by foster parents. At the time of our review, CFSA was exploring ways to obtain such information in a more timely manner. Additionally, the consent order requires licensing functions to be consolidated within CFSA.

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system capacity to meet the agency's long-term needs for placement opportunities.<sup>31</sup>

To address its placement needs, CFSA has worked with the Annie E. Casey Foundation to study ways to recruit additional foster homes, and it implemented a project with this aim in June 2000. The foundation's Family-to-Family initiative, for example, uses strategies to recruit, train, and retain foster families that are community-based and culturally sensitive. Additionally, CFSA's adoption program manager identified ways to improve adoptive home recruitment by, for example, conducting effective follow-up with persons interested in adopting.<sup>32</sup> In September 2000, the receiver announced emergency plans to pursue contract modifications that would allow providers who have an immediate capacity to accept additional children to do so.

#### Support Services for Foster and Adoptive Families

CFSA has had difficulties in providing pre-placement and post-placement support services. For example, the MFO required social workers to visit children in foster homes not less frequently than once a week for the first 2 months after placement. While CFSA reported that as of June 2000 social workers had visited most foster children at least once, agency data show that in most cases the reported visits were less frequent than once a week. As of June 2000, CFSA reported that 53 children had not been visited at all since being placed.<sup>33</sup>

Moreover, foster and adoptive parents may not be fully prepared for the complexity of children's needs. CFSA's Office of Quality Assurance studied children who had experienced multiple placements and concluded that many foster parents lacked an understanding and knowledge of how to cope with the special needs of some children.<sup>34</sup> These needs reflect underlying conditions such as depression, attention deficit hyperactivity

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<sup>31</sup>In September 2000, the need for such an analysis was cited by a Chapin Hall Center for Children survey of the private organizations providing child welfare services to children and families in the District. See Fred Wulczyn, Emily Zimmerman, and Jennifer Haight, *An Assessment of Contract Agency Capacity in the Washington, DC Child Welfare System*, Chapin Hall Center for Children at the University of Chicago (Chicago: June 2000).

<sup>32</sup>Toni Oliver, *Issues in Recruitment* (College Park, Ga.: J.T. Oliver & Associates, 1993).

<sup>33</sup>Of 1,030 children needing visits, CFSA reported in June 2000 that 977 had been visited at least once and 53 had not yet been visited.

<sup>34</sup>CFSA Office of Quality Assurance, "Children with Four or More Placements," Spring 2000.

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disorder, post-traumatic stress disorder, and attachment disorder. In some cases, CFSA has provided insufficient support to stabilize placements and prevent disruptions. For example, the report found that, in some cases, social workers failed to implement recommendations included in psychological and psychiatric evaluations and that some children who had been physically or sexually abused were not provided therapy or other services aimed at addressing the effect of abuse when they entered foster care.

Similarly, the MFO recognized that services are necessary to preserve adoptive families and requires that families at risk of disruption receive appropriate services. A CFSA adoption official acknowledged that many children also have special needs that present long-term issues that may not become apparent until some time after the adoption has been finalized. This situation can appear to be overwhelming to adoptive parents, who may need ongoing services to ensure family stabilization and prevent disruption. In response to the needs of adoptive families, CFSA initiated a new postadoption program, supported by an initial grant from Freddie Mac in June 1999.<sup>35</sup> The new program will coordinate a range of referrals for adoptive parents, such as medical and mental health advocacy groups, developmental specialists and therapists, and experts who are knowledgeable about the needs of adopted children.

## Oversight of Contracted Services

Although the MFO requires CFSA to use performance-based contracting, CFSA has made little progress in holding its contractors more accountable for the services they provide.<sup>36</sup> For example, although CFSA has succeeded in introducing some performance measures to guide oversight of the eight Healthy Families/Thriving Communities collaboratives, these performance-based contracts represent a small proportion of all contracts. More generally, CFSA's capacity for effective oversight of contracts is limited in several ways. The agency employed six contract monitors to oversee contract expenditures of about \$80 million for fiscal year 2000.<sup>37</sup> A CFSA

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<sup>35</sup>The Freddie Mac Foundation provides grants to improve outcomes for children and families, including initiatives in foster care and adoption. In 1999, the foundation gave about \$1.9 million to foster care and adoption projects nationwide.

<sup>36</sup>The MFO required that each contract include specific standards by which contractors' performance can be measured.

<sup>37</sup>CFSA stated that this amount did not reflect some outstanding payables as of October 2000.

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contracts official stated that some of these contract monitors lack training and experience corresponding to this level of responsibility.<sup>38</sup>

CFSA's oversight of certain facilities is augmented by group home and residential treatment center monitors, who are responsible for ensuring that facility staff and conditions are consistent with the terms of the contract. Specifically, 4 group home monitors are responsible for overseeing about 17 homes, and 3 residential treatment center monitors have oversight of about 30 facilities.<sup>39</sup> Generally, contracts with the group homes require visits by the group home monitors at least once a month, and visits with each residential treatment center are to be made at least quarterly. Given the monitors' oversight responsibilities and staff resources, they told us they need additional monitoring staff to more effectively oversee facility performance. Moreover, the monitors stated that there is currently no oversight of about 200 purchase-of-service agreements, which are small contracts that usually involve specific services for one child each. Agency officials stated that CFSA plans to develop a process to monitor these contracts.

## Specialized Organizational Units

Although not required to do so by the MFO, CFSA has added staff to existing organizational units that address relationships with the court and the processing of interstate placements for children. While both units have helped the agency address specific problems, the units face ongoing challenges related in part to high social worker caseloads and the agency's difficulties in securing placements for children.

Since 1998, CFSA has added nine positions to its Court Liaison Unit, which formerly consisted of one person.<sup>40</sup> The unit is to track all court reports and court orders, submit court reports and case plans in timely fashion, and

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<sup>38</sup>CFSA's FACES system has the ability to aggregate social workers' detailed ratings of contractor performance to provide specific feedback at contract renewal. However, to be effective, this mechanism depends on complete data entry, and social workers were not consistently using this feature as of October 2000, according to the deputy receiver for operations.

<sup>39</sup>The residential treatment centers are located throughout the country. For example, there are centers serving youth in CFSA's care in Florida, Massachusetts, New Mexico, Pennsylvania, South Carolina, and Texas. According to CFSA's residential treatment coordinator, there were about 130 youths in these centers as of August 2000.

<sup>40</sup>Of the current staff assigned to the unit, three social services assistants were assigned as recently as May 2000.

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maintain relationships with the judges. Despite these additional resources, as of July 2000, Superior Court judges said that social workers consistently fail to submit court reports and case plans in a timely way, which adversely affects working relationships between CFSA and the court. Social workers we spoke to acknowledged that when caseloads become difficult to manage, they cannot always document case information, compounding the court's dissatisfaction with their performance.

Regarding interstate placements, the agency hired four social workers on a temporary basis in May 2000 to reduce a backlog of several hundred placements that lacked proper documentation. Numerous clearances (for example, police clearances and medical reports) are required when children are placed in foster homes. Because these clearances require lead time to process, children were placed outside the District before all the paperwork could be completed. According to CFSA officials and social workers, CFSA continued making such placements without completing all the necessary documentation, effectively violating the ICPC requirement to provide sufficient information to the state where the placement is made. Agency staff cited several factors that contributed to the growth of the backlog. For example, some children were required to be placed out of state by court order, some were placed with relatives, and, for other children, no alternative placements were available in the District. Some social workers said that all or most of their cases require interstate placement and, therefore, completion of the ICPC process. CFSA reported 999 children in its ICPC backlog as of September 2000.<sup>41</sup> The interstate compact coordinator reported that the majority of these backlog cases needing additional documentation were in Maryland.<sup>42</sup> In September 2000, CFSA, the Deputy Mayor for Children, Youth, and Families, and the state of Maryland signed a memorandum of understanding regarding the completion of interstate compact documentation for children already placed in Maryland and expedited the processing of current and future interstate compact approvals. The memorandum provides that 10 percent of Maryland's emergency placement slots are to be designated for District placements of up to 30 days. According to the terms of the consent order, CFSA will assume total responsibility for the ICPC function and will no

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<sup>41</sup>Of the 999, CFSA reported that, as of September 2000, 249 ICPC packets were either being prepared for submission or had been submitted to the District ICPC office for processing.

<sup>42</sup>The agency stated in September 2000 that it relies on 754 foster homes in Maryland for placements; these homes represented 60 percent of all foster homes available to the agency.

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longer need to forward paperwork to DHS for processing, creating an opportunity to reduce processing delays.

Time Periods to Achieve Permanent, Stable Care

As embodied in ASFA, an important goal in child welfare is to reduce the amount of time children spend in the system and move them into permanent placements as soon as possible. Permanent placements may take one of several forms, such as family reunification, adoption, independent living, and placement with a relative or guardian. Although the number of adoptions has increased, the agency has made little progress in moving children into other permanent placements. CFSA relies on several processes to expedite permanency, but each has its shortcomings, and children still spend about 3.7 years on average in the system. Moreover, under ASFA, which requires a permanency hearing no later than 12 months after a child enters foster care and allows the federal government to withhold funding in the event of noncompliance, the District faces additional pressures to reduce delays in moving children into permanency.

The MFO included various provisions to expedite processing adoption cases.<sup>43</sup> While the agency has been instrumental in increasing the number of adoptions, more can be done to expedite the cases of children waiting to be adopted. In fiscal year 1999, CFSA achieved 250 adoptions that were made final by the District Superior Court—a record number and an increase of almost 200 percent from 1995. In fiscal year 2000, 329 adoptions were made final. The adoption program manager attributes the increase to efforts that have been made to identify various ways to expedite the processing of adoption cases, such as moving the cases of abandoned babies directly from intake to adoptions, using the waiver of parental rights (which can be more timely than the termination process), and setting deadlines for paperwork submitted by pre-adoptive parents. However, CFSA's adoption program manager estimated that at least 600 children in CFSA's care with a goal of adoption are being handled by other programs, such as traditional foster care and kinship care, and concluded that more needs to be done to transfer adoption cases to the adoption program in a timely way.

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<sup>43</sup>For example, within 30 days of establishing a permanency goal of adoption, CFSA social workers are to develop a plan with attorneys of OCC regarding the termination of parental rights and, within 5 days of establishing this goal, the case should be transferred from its original program (for example, foster care or kinship) to the adoption program.

Several agency processes aim to expedite moving children into permanent care: administrative reviews, special staffings, and using new performance standards in staff appraisals. Regarding administrative review, federal law and the MFO require every 6 months an administrative review of the progress toward permanency and the achievement of case plan goals for all children in foster care.<sup>44</sup> The objective of these reviews is to ensure that children’s physical, social, and emotional needs are being met and that progress toward permanency is timely. However, as shown in table 5, a report prepared by the court-appointed monitor shows that as of July 1999, while CFSA had made some progress in reducing the number of cases with no review between December 1998 and July 1999, the agency had made no progress in reducing the number of cases with untimely reviews.<sup>45</sup> Moreover, of the cases with untimely reviews in July 1999, about half had not been reviewed in more than a year. As of October 2000, the agency could not provide more recent data on cases without reviews and cases with untimely reviews.<sup>46</sup>

**Table 5: The Timeliness of Case Reviews, December 1998 and July 1999**

Cases	December 1998	July 1999
No administrative review	490	212
Untimely administrative reviews	362	366

Source: Center for the Study of Social Policy.

In late 1998, CFSA began a series of special “permanency staffings” meetings to review children’s progress toward obtaining permanent, stable care arrangements. The effort focused on the cases of children who had been in foster care for 15 of the past 22 months.<sup>47</sup> CFSA plans to continue to hold these meetings in order to reduce the backlog of cases in this category.

<sup>44</sup>42 U.S.C. 675(5)(B).

<sup>45</sup>Center for the Study of Social Policy, *LaShawn A. v. Williams Progress Report as of December 31, 1999* (Washington, D.C.: Mar. 7, 2000).

<sup>46</sup>Data on reviews were still being entered into FACES and this data entry was expected to be complete by the end of the calendar year; once data entry is complete, the system is expected to be able to generate the data necessary to track the timeliness of reviews.

<sup>47</sup>Newer cases continue to go through the administrative review process.

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For each case reviewed, the cognizant worker and supervisor review the case plan and the permanency goal and make suggestions for determining whether the permanency goal is still appropriate and consistent with the case plan. In some instances, it may be determined that the child has reached permanency and that the case is ready to be closed. However, the meetings do not routinely include legal advice that may be required to determine whether a case is ready to be closed. In February 2000, a District Superior Court official reviewed 68 cases that were subject to these special permanency staffings and found that, for most cases, documents contained insufficient information to make a determination of case closure and that legal input to determine whether certain legal standards (for example, “reasonable efforts”) had been met was lacking.<sup>48</sup>

Finally, according to CFSA officials, children’s movement toward permanency will be considered in a new staff appraisal process that incorporates performance standards developed by the firm of Arthur Andersen.<sup>49</sup> While this step would enhance individual social worker accountability for progress toward permanency, the performance standards had not been implemented in September 2000 as planned, pending resolution of a citywide collective bargaining process.

While CFSA needs to demonstrate more progress in moving children into permanent placements, the implementation of ASFA, with its specific time periods and financial penalties, introduces new risks for CFSA’s federal funding.<sup>50</sup> Federal regulations provide for periodic audits of states’

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<sup>48</sup>Established under the Adoption Assistance and Child Welfare Act of 1980 (Pub. L. No. 96-272), the term “reasonable efforts” is not defined in federal statute or regulations and has been interpreted in a wide variety of ways by states and the courts. According to HHS, services offered or provided to the family, such as family counseling, respite care, and substance abuse treatment, have often been considered to constitute reasonable efforts to prevent a child from being removed from home or to return a child home.

<sup>49</sup>Larry A. King, *Development of Performance Standards* (Washington, D.C.: Arthur Andersen, June 20, 2000).

<sup>50</sup>For example, ASFA modified the definition of the case review system to require a permanency hearing no later than 12 months after a child entered foster care and the filing of a petition to terminate parental rights when a child has been in foster care for 15 of the most recent 22 months or a court has determined that a child is abandoned or the parent has murdered another child (or committed certain other offenses). See 42 U.S.C. 675(5)(C) and (E). Failure to comply with these and other requirements can jeopardize federal funding for foster care maintenance payments. See 45 C.F.R. 1356.21(a).

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substantial compliance with ASFA.<sup>51</sup> The audits review outcomes and timeliness on small samples of about 30 to 50 cases. If CFSA is deemed out of substantial compliance with ASFA, penalties could be imposed, jeopardizing a portion of the agency's federal funding. CFSA officials expect that HHS will conduct this audit in July 2001.

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## The District's Efforts to Provide More Collaborative Services Are Limited in Scope

Our previous work and studies by other organizations have shown that certain systemwide initiatives are critical to improving child welfare outcomes. Critical initiatives include collaborative operations among the agencies that provide child welfare and other support services, as well as case-specific initiatives aimed at bringing together children, family members, social workers, attorneys, and others to help address the needs of children and their families.<sup>52</sup> Some participants in the District's child welfare system have recently taken initial steps to improve operations. For example, District agencies have initiated recent efforts to integrate child welfare services with other family services. However, systemwide collaboration has not yet been fully developed, leaving the District's child welfare system hampered by continued fragmentation. In addition, while some District families have access through the collaboratives to an approach called family case conferencing that brings relatives into decision-making around a child's well-being, CFSA has not adopted this approach in its own practice with families.

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## Collaboration on Two Levels Is Critical to Effective Child Welfare Systems

In our earlier testimony, we reported that effective working relationships among key child welfare system participants who play a role in keeping children safe are essential to successful reform efforts.<sup>53</sup> In order to function effectively, child welfare agencies need a rich array of services to meet the needs of abused and neglected children and their families. Rarely, however, does a single state or local agency have control over acquiring all the needed services, and many of those services, such as mental health care and drug treatment, are outside the control of the child welfare agency. Therefore, strong collaboration among all stakeholders who play a role in

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<sup>51</sup>45 C.F.R. 1355.31-1355.39 (as added Jan. 25, 2000).

<sup>52</sup>Case-specific initiatives focus on practice at the case level rather than the system or interagency level.

<sup>53</sup>*Foster Care: Status of the District of Columbia's Child Welfare System Reform Efforts* (GAO/T-HEHS-00-109, May 5, 2000).

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helping children and families, such as the courts, private provider agencies, neighborhood collaboratives, the police department, local government leaders, substance abuse and mental health agencies, and agency legal counsel, is essential to obtaining the necessary services.

Collaborative approaches can occur on two levels—some focus on integrating the key child welfare system participants to develop joint solutions to cross-cutting problems, and others focus on building collaboration in making decisions on individual child welfare cases. In our earlier testimony, we reported that strong collaboration among all stakeholders who play a role in helping children and families is essential to obtaining necessary services.<sup>54</sup> For example, jurisdictions in five states—California, Florida, Illinois, North Carolina, and Ohio—have convened multidisciplinary advisory committees to work on resolving turf battles, dispel the mistrust among system participants, and develop and implement reforms. Committees were typically composed of representatives from key groups such as child welfare agencies, attorneys, judges, court-appointed special advocates, and other advocates.<sup>55</sup>

For example, Cook County, Illinois, established a Child Protection Advocacy Group of 32 individuals representing all offices of the court, the child welfare agency, private social service agencies, legal service providers, advocacy groups, and universities. The group's subcommittees focus on various issues such as formulating alternatives to court intervention, making decisions in the best interest of the child, and terminating parental rights. To help reform the child welfare system and the court's role in it, the group was charged with advising the presiding judge on all matters relating to improving the court's Child Protection Division. Participants in these groups noted that working together in this way provided a unifying force that was invaluable in initiating and institutionalizing reforms.

In a 1999 report, the National Association of Public Child Welfare Administrators, an affiliate of the American Public Human Services Association, also cited the benefits of interagency collaboration. According to the association, an interagency approach to providing child protection

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<sup>54</sup>GAO/T-HEHS-00-109.

<sup>55</sup>Court-appointed special advocates, usually volunteers, are trained to assist the court and oversee a child's case.

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and other services can improve agency coordination, identify service gaps, and advocate for needed resources.<sup>56</sup>

Other jurisdictions across the country have taken a different approach to building collaboration by pooling or blending funds from multiple funding sources to obtain the needed services on a more integrated, systemwide basis. For example, Boulder County, Colorado, pooled its child welfare allocation from the state with funding from the mental health agency and the youth corrections agency to provide joint programming and placement decision-making for adolescents in need of out-of-home care in group or residential settings. Similarly, the Wraparound Milwaukee program in Wisconsin blended Medicaid, child welfare, and federal grant funds into a single buying pool to purchase individualized, family-based services to help children placed in residential treatment centers return to their families, foster homes, or other living arrangements in the community.<sup>57</sup>

Other collaborative efforts focused on improving decision-making on individual cases, intervening at key points to gather and share comprehensive information among participants. For example, Day One Conferences in North Carolina's District 20 are held on the first business day after a child is taken into custody by the child welfare agency. In attendance are the parents, child welfare caseworkers, guardians *ad litem*, public and mental health liaisons, attorneys, public education liaisons, child support liaisons, and law enforcement officers.<sup>58</sup> These meetings provide a forum to arrange immediate services for the family and provide an opportunity to reach agreement on many aspects of the case outside the courtroom, thus reducing the number of times a case is continued in court.<sup>59</sup> Our previous work showed that state and local officials who had implemented these conferences believe that additional time invested at the beginning of a case can shorten the length of time it takes to make a

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<sup>56</sup>American Public Human Services Association, *Guidelines for a Model System of Protective Services for Abused and Neglected Services and Their Families*, rev. ed. (Washington, D.C.: 1999).

<sup>57</sup>The county child welfare agency and the state health care financing agency each agreed to pay a specific monthly rate for services to children. These funds were pooled with a federal grant to pay the costs of residential treatment, group and foster care, and all other services except physical health care.

<sup>58</sup>Guardians *ad litem* are attorneys or trained volunteers who represent a child in court, investigate the case, and monitor case progress.

<sup>59</sup>Judges continue a case by rescheduling it for another day.

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permanent placement decision.<sup>60</sup> The National Council of Juvenile and Family Court Judges has also provided guidance on how to improve case-specific decision-making in child abuse and neglect cases. The council reported that the nation's juvenile and family courts need clear guidance on how they can best fulfill their responsibilities in child abuse and neglect cases. According to the council, such guidance should explain the decision-making process in these cases and identify the individuals required to attend applicable proceedings.<sup>61</sup>

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### District Agencies Have Undertaken Initial Collaborative Efforts

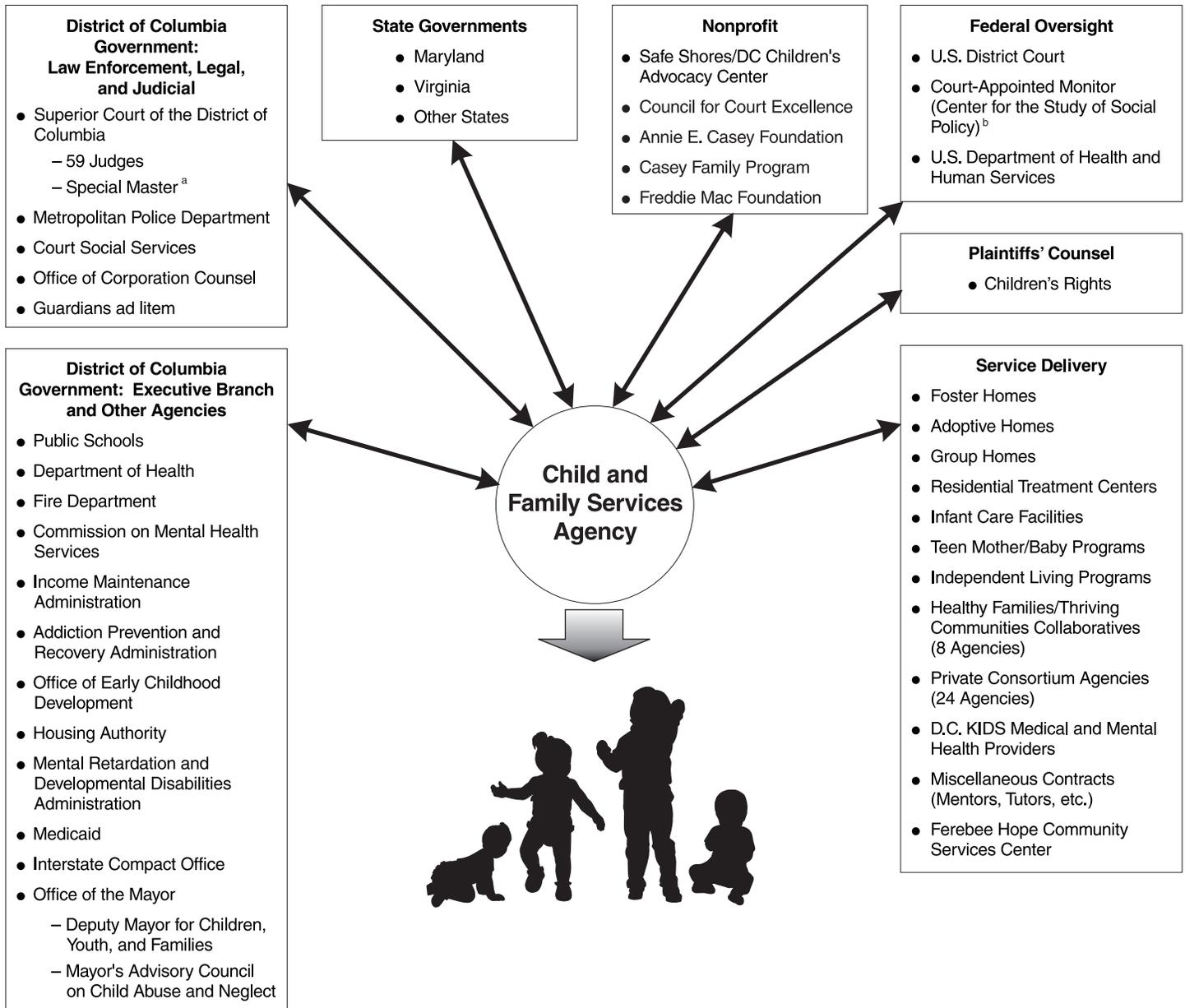
In the District of Columbia, numerous and diverse agencies provide programmatic and legal services for the many children in CFSA's custody, as depicted in figure 1. District officials and child welfare experts familiar with the District acknowledge that collaboration is key to protecting children. Toward this end, various District agencies and others have undertaken initial efforts to work together to improve services for children and families. However, these efforts have been limited in scope. The information below highlights such interagency efforts.

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<sup>60</sup>*Juvenile Courts: Reforms Aim to Better Serve Maltreated Children* (GAO/HEHS-99-13, Jan. 11, 1999).

<sup>61</sup>National Council of Juvenile and Family Court Judges, *Resource Guidelines: Improving Court Practice in Child Abuse and Neglect Cases* (Reno: 1995).

**Figure 1: Key Participants in the District of Columbia's Child Welfare System**



<sup>a</sup>Leads a remedial project intended to expedite case review for children in foster care 15 of the past 22 months.

<sup>b</sup>A nonprofit, nongovernment agency reporting directly to the U.S. District Court.

Source: CFSA data and interviews with system participants.

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- *Children's Advocacy Center.* Created in 1995, the D.C. Children's Advocacy Center—"Safe Shores"—operates a nonprofit organization in partnership with the District and federal government agencies. The center coordinates the work of an interagency, multidisciplinary team that investigates allegations of physical and sexual abuse of children. The interagency team includes law enforcement officers, social service officials, prosecution attorneys, mental health workers, medical personnel, and victim advocates. Despite the collaborative efforts spearheaded by the center, its efforts focus on the population of physically and sexually abused children and do not reach the population of neglected children.
  - *Family Reunification.* Recognizing the central role proper housing can play in helping to reunify children and their families, CFSA and the District's Housing Authority have worked together to help families obtain suitable housing. Funds from the U.S. Department of Housing and Urban Development support this effort for the benefit of families with children in CFSA's custody, among other program participants. However, the demand for housing in this program exceeds the supply.
  - *Court Reform Project.* The D.C. Superior Court and CFSA have had difficulty sustaining effective working relationships, as discussed previously. To address these difficulties, the court, in conjunction with the National Council of Juvenile and Family Court Judges, has been selected to participate in a court reform project aimed at applying best practices to court processes, including practices to improve working relationships between CFSA and other selected child welfare system participants.

Another approach to improving collaboration across programs and systemwide operations is pooling or blending funds. To help facilitate access to various funding sources, CFSA has budgeted for emergency cash assistance to help finance such needs as one-time rent deposits, furniture, and clothing. While such assistance may help social workers and other staff gain access to funds in support of multiple needs, these budgeted funds do not cover other service needs, such as mental health services for children living with their birth parents or kin. The separation of funding streams that are tied to different programs may also hamper the ability to pool or blend funds across programs or to target funds appropriately. According to the Children's Advocacy Center Executive Director's testimony in May 2000, the historical lack of a citywide strategic funding plan for maltreated children has adversely affected the prevention of child abuse and has allowed funding from multiple sources to determine programming rather

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than permitting the needs of the community's children to drive the system's response.<sup>62</sup>

In addition to collaborative efforts involving specified agencies and funding sources, several CFSA officials, District officials, and other child welfare experts we spoke with suggested that systemwide authority is needed to provide overarching leadership and accountability. The information below highlights two existing structures to provide interagency oversight and coordination.

- *Deputy Mayor for Children, Youth, and Families.* In 1999, the District's Mayor appointed a Deputy Mayor for Children, Youth, and Families as a new cabinet position with responsibility for overseeing initiatives aimed at addressing the needs of the District's children, youth, and families. In this position, the Deputy Mayor oversees DHS, the Department of Health, Office on Aging, and the Department of Recreation. CFSA management and District officials we interviewed acknowledged the Deputy Mayor as a focal point for fostering greater communication or collaboration among District government agencies on behalf of children and families.
- *Mayor's Advisory Committee on Child Abuse and Neglect.* During an earlier mayoral administration, the Mayor's office established the Mayor's Advisory Committee on Child Abuse and Neglect to promote public awareness of child abuse and neglect, assist in improving services and coordinating interagency activities, and make recommendations regarding needs assessments and policies, among other priorities. The committee recommends program improvements to the Mayor. While the committee includes 27 members, as of September 2000, its membership did not include representatives from the District's substance abuse agency, public school system, or public housing authority. Moreover, the committee has relatively limited funding. It administers a \$50,000 fund held in trust for the District's children.

Case-specific initiatives can improve efforts to meet the needs of children and their families as well. For example, District agencies recently initiated efforts to address circumstances that undermine family stability and case processing needs. The D.C. Superior Court's Special Master, among other

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<sup>62</sup>Testimony from Safe Shores, the D.C. Children's Advocacy Center, before the House of Representatives Committee on Government Reform, Subcommittee on the District of Columbia, May 5, 2000.

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priorities, reviews the status of child welfare cases to facilitate timely action and reduce case backlogs.<sup>63</sup> In addition, the Superior Court has begun a permanency mediation pilot designed to include birth parents and relatives in decisions concerning particular permanency goals for children, such as adoption. Finally, two of the Healthy Families/Thriving Communities neighborhood collaboratives began family case conferencing practices aimed at bringing families together, with the support of trained facilitators, to develop a strategy to support the child's well-being. CFSA program managers said that, consistent with a neighborhood-based service delivery philosophy, the agency has chosen to rely on the collaboratives to initiate efforts at achieving family case-conferencing and other case-specific collaboration, preferring instead to hold special meetings with agency personnel, once a child is in its custody. As of September 2000, CFSA reported that it had referred 17 families to collaborative-sponsored family case conferencing. The receiver acknowledged that CFSA could adopt family case conferencing for its own case practice and that such an approach would benefit children and families. However, she said that this approach would not be appropriate for all families.

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### Collaborative Efforts Are Constrained by Long-Standing Organizational Impediments

While various entities in the child welfare system have begun efforts to improve collaboration between CFSA and others, these efforts have been constrained by ineffective working relationships among CFSA and other key participants. In 1999, the Mayor's office issued the results of a study that reviewed the status of interagency operations in the District's child welfare system.<sup>64</sup> The study found that CFSA lacks functional relationships with critical executive branch government agencies, such as DHS, the Department of Health, Fire and Emergency Medical Services, and the District of Columbia public school system. In addition, CFSA staff and Superior Court judges said the agency and the court have poor working relationships. CFSA social workers have not consistently provided court reports and other hearing documentation when ordered by the court, and they have not always reported to court to attend hearings. Attorneys from OCC have responsibility for prosecuting civil abuse and neglect cases on behalf of the District of Columbia. CFSA attorneys acknowledge this role, noting that OCC represents not the legal interests of children but the

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<sup>63</sup>A special master is a parajudicial officer appointed to assist the court with a particular matter or case.

<sup>64</sup>Graham and Khabo.

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District as a whole. As a result, the opinions of CFSA social workers and OCC attorneys are sometimes at odds. In this instance, CFSA social workers believe that they do not have adequate representation. Moreover, OCC management acknowledged that it does not have enough attorneys to cover all cases. Given these resource constraints, they focus on new cases entering the system and other critical issues.

As specified in its child welfare system emergency reform plan of October 2000, the District plans to provide additional resources to OCC to help eliminate the backlog of foster care and adoption cases and achieve compliance with ASFA. Toward this end, the plan requires a workload analysis of OCC and a survey of other jurisdictions to determine the staffing and resource levels necessary to help ensure ASFA compliance and to expedite prosecutions for child abuse and neglect. In addition, the U.S. District Court's consent order requires the District to provide CFSA with adequate legal staff to enable the agency to meet its legal obligations under the MFO, including the creation of a legal unit within OCC to provide legal services to CFSA.

Bifurcated responsibilities for child abuse investigations compound the organizational fragmentation of the District's child welfare system. Under this bifurcated approach, the District's criminal statutes assign MPD lead responsibility for investigating child abuse cases. The investigatory practices of MPD are sometimes at odds with those of CFSA social workers, which can make it more difficult for social workers to respond to the needs of the child and family based on their own established protocols. Investigatory responsibilities are further complicated by resource constraints. While the MFO requires MPD and CFSA to conduct joint investigations of abuse cases, department and agency officials said that the inability of both organizations to jointly staff investigations has prolonged investigatory time periods. MPD and CFSA attributed the lack of joint investigations to the lack of available police officers and social workers when an instance of child abuse is first alleged. The bifurcated approach also splits case administration responsibilities between CSS and CFSA. According to CSS staff, they administer about 600 child abuse cases that are not included in CFSA's automated system. To address the difficulties posed by having bifurcated investigatory responsibilities between CFSA and MPD, a District task force has developed joint investigatory protocols involving child protection workers and law enforcement officials. The U.S. District Court's consent order addresses the current bifurcated system and calls for District government to enact legislation requiring CFSA and MPD to conduct joint investigations of child abuse allegations.

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## The Structural Issues Are Important in Transferring CFSA Back to the District

Long-standing challenges such as a lack of effective working relationships in the child welfare system impede the District's ability to fully apply best practices to protect children. As it prepares for the transfer of CFSA to local governance, the District faces many organizational and operational challenges. To maximize the opportunity for the child welfare system to improve the well-being of children and their families, District officials and child welfare experts have acknowledged that a sound transition plan should be developed to help facilitate this transfer. They believe this plan should address several factors, such as the organizational context within which the new child welfare agency would operate, the recruitment and retention of qualified personnel, and a mechanism for ongoing oversight and accountability.

Participants in the child welfare system took the first step and developed an emergency reform plan at the request of the Subcommittee on the District of Columbia of the House Committee on Government Reform. Prepared with input from key participants in the District's child welfare system and presented to the subcommittee by the Mayor in October 2000, this plan addresses the roles of OCC, MPD, the D.C. Superior Court, and others in the District's child welfare system.<sup>65</sup> In October 2000, the U.S. District Court issued a consent order terminating the receivership upon the satisfaction of several major conditions, such as the enactment of legislation ending bifurcated investigations of child abuse and neglect allegations, the appointment of a child welfare agency administrator by the District's mayor, and the development of licensing standards for foster homes and group homes. The order also provides for a 1-year probationary period during which CFSA must meet specific performance standards, such as meeting investigation time periods, complying with social work visitation requirements, and complying with ASFA time periods, among others. During this probationary period, the MFO is not enforceable, allowing the District time to make improvements to the system without the threat of litigation. At the conclusion of this period, if the court believes the agency has performed satisfactorily, the MFO will again become fully enforceable and the monitor will continue to report on the agency's compliance with the order.

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<sup>65</sup> *District of Columbia Child Welfare System Emergency Reform Plan*, submitted to the House of Representatives, Committee on Government Reform, Subcommittee on the District of Columbia (Washington, D.C.: Oct. 4, 2000).

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The plan and subsequent consent order attempt to address a number of the organizational challenges faced by CFSA and the District's child welfare system as a whole. The consent order mandates that CFSA be established as a cabinet-level agency with independent hiring authority and independent procurement authority consistent with District law, as a precondition for terminating the receivership. CFSA officials said that certain benefits would be associated with separate, cabinet-level status. These officials believe that cabinet-level status would provide CFSA with greater independence for setting program priorities and obtaining needed resources. For example, some officials believed this status would provide the agency more control over recruiting staff and would allow the agency to respond more flexibly to the needs of children and families. One official thought that cabinet-level status would enhance service delivery and interagency coordination.

The emergency plan and court mandates contained in the consent order also call for additional responsibilities to be transferred to the agency. For example, these requirements call for transferring to CFSA responsibility for (1) implementing the ICPC from DHS; (2) licensing, regulating, and monitoring foster and group homes from the Department of Health; and (3) managing the child abuse cases currently handled by CSS. The emergency reform plan also calls for, among other things, developing a community-based service delivery system in which services are provided to children and families in their own neighborhoods and for expanding the Safe Shores Children's Advocacy Center into a Children's Assessment Center—co-locating and integrating the work of all agencies involved in the investigation and prosecution of child abuse and neglect. Accomplishing many of these initiatives, however, would require developing and implementing new local legislation and enhancing federal funding. Although the emergency plan provides time periods for implementing the initiatives, it does not discuss some of the details regarding implementation, such as the need for new staff to handle the increased responsibilities. A member of the Mayor's staff indicated that the District will develop an implementation plan as part of its legislative package outlining how the District will carry out the requirements of the consent order.

With respect to personnel issues, particularly those in higher-level management positions, it remains unclear whether the CFSA staff hired as employees under the receivership would be converted to District government positions. About one-third of CFSA's current workforce was hired by the former receiver. CFSA officials added that the agency will need

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to plan for how it will address the future employment status of these employees upon transfer of the agency to the District. The emergency reform plan was silent on how these personnel issues will be handled. The consent order, however, requires the named parties to develop a plan for addressing the status of employees hired under the receivership.

With regard to the continued need for agency oversight, District officials outside CFSA have pointed to the need for a mechanism to ensure the agency's accountability in the future. Upon transfer of CFSA to the District, the court-appointed monitor will retain responsibility for assessing the extent to which CFSA meets the performance standards contained in the consent order. The development of a baseline by which to measure CFSA's performance is a critical step in carrying out the consent order. The order provides the monitor with the authority to establish the baselines for compliance by conducting a case record review and by relying on CFSA data that the monitor determines are reliable and appropriate. The monitor will also have authority to modify the standards if the defendant or plaintiffs believe they are unreasonable in relation to the baseline.

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## Conclusions

CFSA faces many of the same challenges it faced more than a decade ago when it became the subject of a class action suit filed on behalf of the District's abused and neglected children. Since then the agency has continued to confront long-term managerial shortcomings, and the lack of integration in its child welfare system has contributed significantly to the lack of success in preventing children from entering the system and reducing their length of stay while in the District's care. After 5 years of operating under receivership, CFSA has shown limited progress in meeting the requirements of the MFO. Compounding these agency challenges, the child welfare system—of which CFSA is a part—continues to operate without a fully developed collaborative structure and the effective working relationships it needs to provide integrated services to children and their families. Moreover, the agency has not fully applied best practices to enhance collaboration, such as family case conferencing, that could enhance outcomes for children and families. While the goals outlined in the emergency reform plan and consent order are a necessary first step, long-term structural and operational challenges must be considered in transferring the agency back to local governance and to foster improved outcomes. It will take a fully collaborative system to help ensure progress toward improving program outcomes and sustained commitment from the Mayor and District government to make achieving the goals a priority. Without such collaboration and leadership, the District will continue to

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lack the operational framework necessary to protect and meet the needs of children and ultimately to ensure accountability for these goals.

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## Agency Comments and Our Evaluation

We received written comments on a draft of this report from CFSA and one oral comment from the District of Columbia. CFSA found the report to be balanced in its findings but believed that clarification was needed on several points (see app. IV). CFSA also provided a number of technical comments that we incorporated where appropriate. One of the agency's comments addressed the issue of social worker caseloads. CFSA commented that it is somewhat misleading to report caseload averages for a team of social workers rather than an average caseload per worker in the various program areas. When we asked CFSA for caseload data during the course of our review, the agency provided the range of average caseloads by team. These data do, however, reflect average caseloads carried by workers assigned to teams in each program area. Both CFSA and the Deputy Mayor for Children, Youth, and Families commented on the status of the agency's policies, indicating that policies had existed to a greater extent than portrayed in the draft report. CFSA said it has relied on a 1995 policy handbook and subsequent policy revisions to guide the work of the agency. CFSA further stated that it had been developing an on-line version during the course of our review. We have reviewed the 1995 policy handbook and we have noted the extent to which these policies address court-mandated requirements in appendix II. However, despite the existence of the 1995 handbook, staff we spoke to throughout the course of our review expressed confusion over which policies and procedures to follow and, in some cases, which policies had been approved.

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As we agreed with your offices, unless you publicly announce the report's contents earlier, we plan no further distribution of it until 4 days from the date of this letter. We will then send copies to the Honorable Anthony A. Williams, Mayor of the District of Columbia, the interim receiver, and other District officials. We will also send copies to others who are interested on request.

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If you or your staffs have any questions about this report, please contact Diana M. Pietrowiak, Assistant Director, at (202) 512-6239. Other major contributors were Christopher D. Morehouse, Elizabeth O'Toole, and Mark E. Ward.

A handwritten signature in black ink that reads "Diana S. Eisenstat". The signature is written in a cursive style with a large initial 'D' and 'E'.

Diana Eisenstat  
Director, Education, Workforce, and  
Income Security Issues

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# Scope and Methodology

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Using primary and secondary source material, we designed our methodology to validate the status of progress the Child and Family Services Agency (CFSA) has made toward meeting requirements of the modified final order (MFO). We asked CFSA to provide copies of written policies and procedures and management information system (MIS) reports so that we could assess its status in complying with the court-mandated requirements. We did not independently verify the accuracy of the data in the MIS reports that CFSA provided. In addition, we reviewed our earlier reports and studies by the American Public Human Services Association, Child Welfare League of America, and other organizations to identify generally accepted best practices of child welfare systems and we assessed the extent to which the District had applied these principles in implementing systemwide child welfare changes. In conducting our work, we relied on a broad array of testimonial, documentary, and analytical evidence in responding to the three research questions.

To identify the financial and operational changes that the receiver appointed in 1997 made to comply with the MFO requirements, we analyzed policies, procedures, and information system reports generated by the receiver and reports from other agencies. Based, in part, on findings contained in our testimony entitled *Foster Care: Status of the District of Columbia's Child Welfare Reform Efforts* (GAO/T-HEHS-00-109, May 5, 2000), our work focused on requirements directly related to agency resources, services for children and families, working relationships with other key stakeholders, and program results. These MFO requirements direct CFSA to address staffing and caseloads, financial management, management information systems, resource development, out-of-home care, and family services. We also obtained and analyzed child welfare agency policies, regulations, memorandums, and other information on agency procedures in order to document financial and operational changes undertaken in efforts to attain MFO compliance. To obtain a broad range of perspectives from staff across CFSA's program areas and with different levels of experience, we interviewed CFSA managers, supervisors, senior social workers, new hires, and other officials knowledgeable about the level of agency compliance. For group interviews with agency staff, we asked CFSA to invite employees with diverse levels of experience to meet with us.

Regarding the efforts to initiate improvements in the District's child welfare system, such as interagency collaboration and the pooling or blending of funds, we examined the extent to which such practices have been included in the day-to-day operations of the District's system and the challenges the

system faces in adopting such initiatives. To make this assessment, we identified initiatives other organizations cited as efforts intended to improve the operations and program results of child welfare systems in other jurisdictions. These organizations include the Annie E. Casey Foundation, the Casey Family Program, the Child Welfare League of America, the Edna McConnell Clark Foundation, and the National Council of Juvenile and Family Court Judges.

To identify additional changes required to return the District's child welfare agency to local governance, we focused our analysis on areas that affect the interaction of child welfare agencies with other organizations. We obtained perspectives on these issues from CFSA staff, program officials in other District of Columbia government agencies, and other organizations. In addition, we analyzed transfer-related documentation developed by the Mayor's office and other organizations to examine proposed scenarios and operational issues the District identified in the context of transferring CFSA back to local governance.

# District of Columbia Child Welfare System Features the MFO Required, July 2000

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
<b>Protective services (intake and assessment)</b>			
Written policies and procedures for cooperative screening and investigation with the Metropolitan Police Department (MPD) of alleged child abuse complaints.		X	
Written policies and procedures for screening complaints of abuse and neglect to determine whether they are within the definitions of District law.		X	
Written policies and procedures for prioritizing response times to each report of abuse and neglect.		X	
Written policies and procedures for conducting risk assessments and ensuring that the child protective services investigations and decisions are based on a full and systematic analysis of a family's situation and the factors placing a child at risk and for guiding decision-making.	X		
An assessment form.	X		
Written policies and procedures for determining which children (who are the subject of abuse or neglect reports or other children in the household) should receive a complete medical, psychological, or psychiatric evaluation.		X	
Ability to produce data showing, for the children who need medical reports, how many received them within 48 hours after the report of neglect or abuse was supported.			X
Written policies and procedures for the reporting, investigation, and determination of reports of neglect or abuse (including specifications of what information must be included), in a final determination of whether abuse or neglect has occurred.	X		
A standardized form for recording final determination.	X		
Written policies and procedures for ensuring that workers receive immediate access to police protection.	X		
<b>Services to children and families</b>			
Written policies and procedures for determining and ensuring that families are referred to and receive the intensity and level of services necessary to preserve family relationships, to prevent additional abuse and neglect, to promote better parental care, and to ensure good care for the child.	X		
Written policies and procedures for specifying criteria for the provision of family services and for referring families to private agencies the agency contracts with for such services.	X		
Ability to produce management data showing the actual caseloads by worker, for workers in home-based services units.	X		

**Appendix II**  
**District of Columbia Child Welfare System**  
**Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
<b>Placement of children</b>			
Written policies and procedures for governing the placement process to ensure that children are placed in the least restrictive, most family-like setting that meets their individual needs and that they are placed in or in close proximity to the homes and communities in which they resided before entering the agency's custody.	X		
Written policies and procedures for ensuring the prompt and appropriate placement—including return home, where appropriate—of infants who are residing in hospitals in the District of Columbia but who are, or are soon to be, medically ready for discharge.		X <sup>c</sup>	
Ability to produce management data showing, for children needing medical screening on entering the agency's custody, those who receive screening within 24 hours.		X	
Ability to produce management data showing, for children placed in substitute care facilities and needing a thorough, professional evaluation of their needs, those who receive evaluation within 30 days.	X		
Written policies and procedures for providing regulations to govern all foster-care facilities it places children in.		X	
<b>Permanency planning</b>			
Written policies and procedures that establish a planning process that initially will seek to work intensively with the child's parents and other appropriate family members to allow the child to remain at home, if appropriate; in instances in which removal is necessary, will work intensively with the child's parents and other appropriate family members collaboratively to return the child home under appropriate circumstances consistent with reasonable professional standards; and if, after all reasonable efforts have been made but have not succeeded in returning the child home, will assure the child an alternative, appropriate, permanent placement as quickly as possible.	X		
Written policies and procedures for ensuring that in all instances in which a report of abuse or neglect is supported, the case is transferred to a foster-care worker within 5 working days of the finding.		X	
Ability to produce management data showing, of all cases in which a report of abuse or neglect is supported, those that were transferred to a foster-care worker within 5 working days of the finding.			X
Ability to produce management data showing, of all cases in which a report of abuse or neglect is substantiated, those in which a worker met with parents within 7 calendar days of the substantiation, those in which a meeting was held after 7 days and those in which no meeting was held.			X

**Appendix II  
District of Columbia Child Welfare System  
Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
Ability to produce management data showing children for whom a case plan was not developed within 30 days.	X		
Ability to produce management data showing the number of children with a permanency goal of returning home for 12 months or more.	X		
A standardized form for 90-day reviews.	X		
Ability to produce management data showing the number of children with a current, valid 90-day review; number of children without such a review.			X
<b>Adoption</b>			
Written policies and procedures for governing the process of freeing children for adoption and matching children with adoptive homes.		X	
Ability to produce management data showing, of the children with a permanency goal of adoption, the number referred to the adoption branch within 5 days of their permanency goal becoming adoption.			X
Ability to produce management data showing the number of children legally free for adoption and awaiting placement for more than 6 months.		X	
<b>Supervision of children in placement</b>			
Ability to produce management data showing, of the children placed in a DHS foster home, the number whom an agency worker has visited at specified intervals.	X		
Ability to produce management data showing, of the children placed in a private-agency foster home, the number whom a private agency worker has visited at specified intervals.			X
Ability to produce management data showing, of the children placed in a foster family or facility, the number who have been visited at specified intervals.	X		
<b>Case review</b>			
Written policies and procedures for ensuring that all children receive administrative reviews.	X		
A quality assurance report.	X		
Written policies and procedures by which the quality assurance unit will conduct quality assurance reviews.	X		
A standardized form used in the quality assurance process.	X		
<b>Caseloads</b>			
Ability to produce management data showing the caseload figures by worker for all workers conducting investigations of reports of abuse or neglect.	X		

**Appendix II  
District of Columbia Child Welfare System  
Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
Ability to produce management data showing the caseload figures by worker for all workers providing services to families in which the children are living in their home.		X	
Ability to produce management data showing the caseload figures by worker for all workers providing services to children in placement, broken out by children with special needs and all other children.		X	
Ability to produce management data showing the caseload figures by worker for all workers with responsibility for children (including situations in which the private agency has responsibility for both the child and the family) in placement with a private agency.			X
Ability to produce management data showing the caseload figures by worker for all workers with responsibility for children in the adoption branch.	X		
Written policies and procedures for using a caseload weighing formula to ensure that workers who have caseloads that fall into more than one category (mixed caseloads) have caseloads that conform with the equivalent of the maximum limits.			X
Ability to produce management data showing the caseload figures by worker for all workers with mixed caseloads.	X		
Ability to produce management data showing the caseload figures by supervisor for all supervisors.	X		
A workload study.			X
Ability to produce management data showing the number of children assigned to a worker within 3 hours of the agency's assuming custody of the child.			X
<b>Staffing</b>			
Ability to produce management data showing the formal identification and assessment of District of Columbia practices and procedures that affect the recruitment and retention of social workers.			X
A recruitment plan for professional staff.	X		
<b>Worker qualifications</b>			
Ability to produce management data showing the number of supervisors with MSWs and the number without.	X		
Ability to produce management data showing the number of supervisors with at least 3 years of social work experience in child welfare.	X		

**Appendix II  
District of Columbia Child Welfare System  
Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
<b>Training</b>			
Written policies and procedures for providing a comprehensive child-welfare training program that will ensure that all persons charged with responsibilities for children in the plaintiff class will receive sufficient training to permit them to comply with the relevant mandates of agency policy, District of Columbia law, and all MFO provisions.	X		
An assessment of staff training needs.	X		
Assessments of training effectiveness.		X	
Ability to produce management data showing the number of new hires with 80 hours of instructional training.	X		
Ability to produce management data showing the number of new hires with 80 hours of field training.	X		
Ability to produce management data showing the number of workers with 40 hours of in-service training each calendar year.	X		
Ability to produce management data showing the number of senior workers with casework responsibility who have 24 hours of training.	X		
Ability to produce management data showing the number of supervisors meeting within 3 months of promotion to supervisor the requirement for 40 hours of training that is directed to supervising child welfare social workers.	X		
Ability to produce management data showing the number of supervisors with 24 hours of in-service training each calendar year.	X		
Ability to produce management data showing the number of foster parents completing 15 hours of training.		X	
Ability to produce management data showing the number of prospective adoptive parents completing 30 hours of training.	X		
Ability to produce management data showing the number of judges trained to date in judicial training program.			X
Ability to produce management data showing the number of professional staff demonstrating satisfactory mastery of the curriculum for the following training: new hire 80-hour instruction, new hire 80-hour field, workers 40-hour in-service, senior workers 24-hour additional, supervisors 40-hour within 3 months, and supervisors 24-hour in-service.		X	
<b>Resource development</b>			
Resource needs assessments.			X
Resource development plan.			X
Reports projecting the number of emergency placements, foster-homes, group homes, therapeutic foster homes, and institutional placements that children in the agency's custody will require during the next 12 months.		X	

**Appendix II**  
**District of Columbia Child Welfare System**  
**Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
A placement implementation plan.			X
Written policies and procedures for ensuring that decisions are made promptly concerning the issuance of a license for any foster-care facility in which a member of the plaintiff class may be placed, including foster homes, group homes, residential treatment centers, and other child-care facilities.	X		
Written policies and procedures for monitoring all facilities and foster homes in which children in the agency's physical or legal custody are placed.	X		
Ability to produce management data showing the number of foster homes and group facilities the monitoring unit visits at least once a year.			X
Ability to produce management data showing by worker the caseload figures for all workers monitoring foster homes.	X		
Ability to produce management data showing by worker the caseload figures for all workers monitoring group homes and institutions.			X
Written policies and procedures for licensing relatives as foster parents.		X <sup>c</sup>	
<b>Contract review</b>			
Written policies and procedures for specific contract performance and a contract performance review process for each category of services.	X		
Ability to produce information systems reports showing, for each worker with direct responsibility for any children in the agency's physical or legal custody, the number of children for whom that worker is responsible.	X		
Ability to produce information systems reports showing, for each worker with direct responsibility for any children in the agency's physical or legal custody, the number of children for whom that worker is responsible for whom any of the following events either are late or are due in the 60 days following the report: expiration of allowed emergency care status, case plan review, administrative review, judicial review, or dispositional hearing.		X	
Ability to produce information systems reports showing, for each supervisor who has principal responsibility for any child in the agency's physical or legal custody, the number of children for whom that supervisor is responsible.	X		
Ability to produce information systems reports showing all facilities—foster homes, group homes, institutions, consortium or other contract homes, or any other facility for which any vacancies exist—including the name of the facility, the type of facility, and the number of vacancies.	X		

**Appendix II**  
**District of Columbia Child Welfare System**  
**Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
Ability to produce information systems reports showing the number of children, by unit, who are placed in facilities—foster homes, group homes, institutions, consortium or other contract homes, or any other facility—that do not have current valid permits or licenses.	X		
Ability to produce information systems reports showing the number of children, by unit, who are placed in facilities—foster homes, group homes, institutions, consortium or other contract homes, or any other facility—in which there are more children than is permitted by the facility's license or permit.		X	
Ability to produce information systems reports showing each facility—foster homes, group homes, institutions, consortium or other contract homes, or any other facility—in which there are more children than is permitted by the facility's license or permit.		X	
Ability to produce information systems reports showing all social workers, by unit, who have caseloads exceeding the caseload limits established in the MFO, including the name and identification of the worker, the worker's supervisor, and the size of the worker's caseload.	X		
Ability to produce information systems reports showing all cases in which an investigation has not been initiated within 48 hours of the receipt of the report.	X		
Ability to produce information systems reports showing all cases in which an investigation has not been completed within 30 days of the receipt of the report of abuse or neglect.	X		
Ability to produce information systems reports showing all cases in which a child does not have a written case plan within 30 days of entering the department's custody.	X		
Ability to produce information systems reports showing all cases in which a child has not received an administrative review during the preceding 9 months.	X		
Ability to produce information systems reports showing all cases in which a child has not received a dispositional hearing within 21 months of entering the department's custody.	X		
Ability to produce information systems reports showing all cases in which a child younger than 6 has been placed in a congregate-care facility.	X		
Ability to produce information systems reports showing all cases in which a child has had a plan of adoption and who has not been referred to the adoption program within 30 days of the establishment of the permanency goal.	X		
Ability to produce information systems reports showing all cases in which a child younger than 12 has been assigned a permanency goal of continued care.	X		

**Appendix II  
 District of Columbia Child Welfare System  
 Features the MFO Required, July 2000**

(Continued From Previous Page)

Feature <sup>a</sup>	Developed	Under development	No efforts initiated <sup>b</sup>
Ability to produce information systems reports showing all cases in which a child younger than 16 has been assigned a permanency goal of independent living.	X		
Written policies and procedures for maximizing funds available to the agency through titles IV-B and IV-E of the Adoption Assistance and Child Welfare Act of 1980, the Medicaid Act, and Supplemental Security Income.		X	

Note: We selected MFO requirements for examination that we identified as key to operating child welfare programs, such as delivering services to children and families and placing children in foster homes and other facilities.

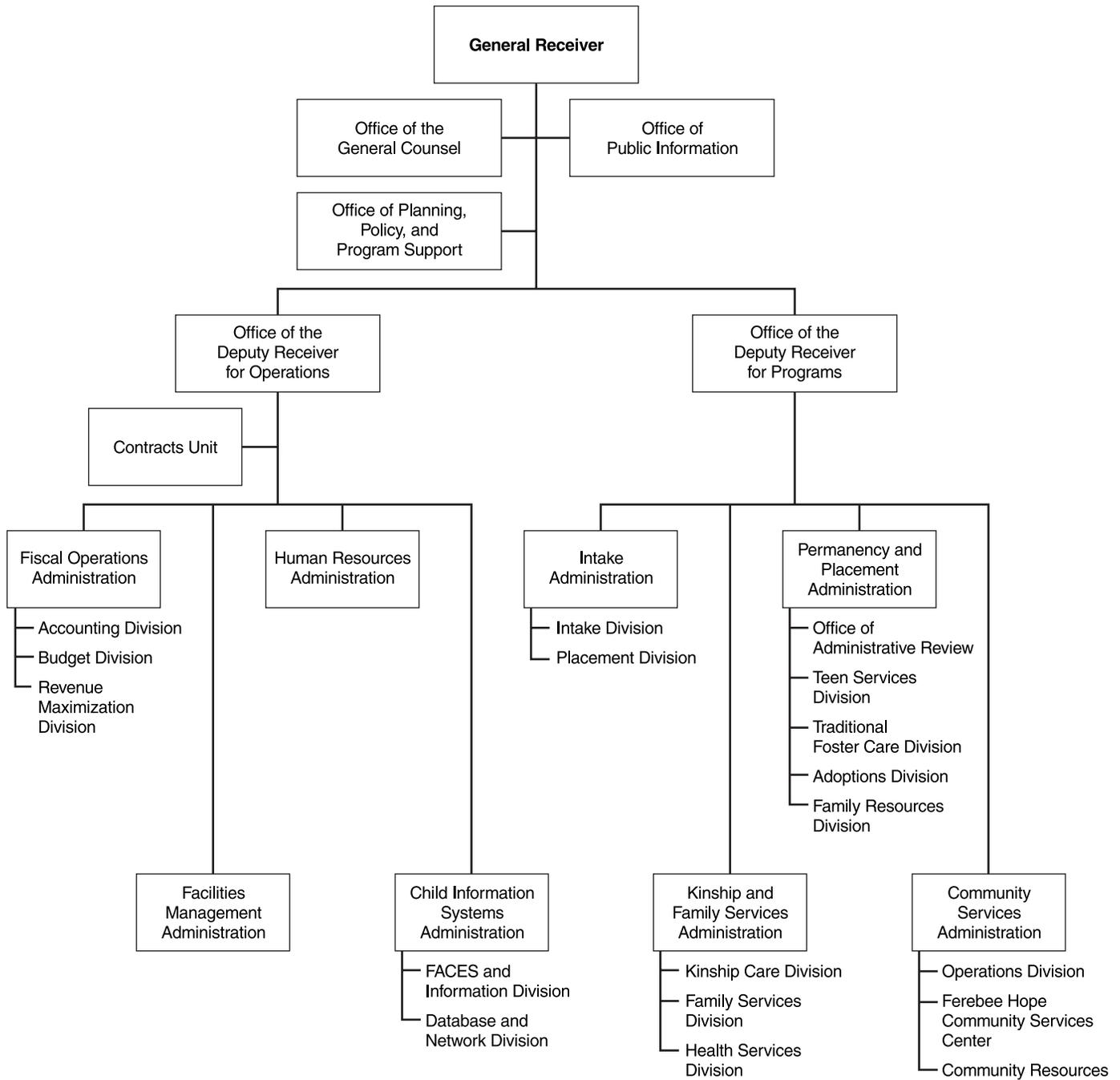
<sup>a</sup>We assessed CFSA's ability to produce written policies and procedures, management data, and information system reports as evidence of the extent to which it had developed practices required by the MFO.

<sup>b</sup>A checkmark in this column indicates that unless otherwise specified, CFSA could not provide any policy or data in response to our request.

<sup>c</sup>In commenting on a draft of this report, CFSA reported that these written policies, procedures, or forms had been developed or were under development. However, at the time of our review, the agency had not provided documentation to support this development.

Source: CFSA.

# Child and Family Services Agency Organization, September 2000



# Comments From the Child and Family Services Agency



**Child & Family Services Agency**  
400 Sixth Street, S.W. - Fifth Floor  
Washington, DC 20024

November 28, 2000

To: Mark Ward, Senior Analyst  
Government Accounting Office

From: Ernestine Jones, General Receiver  
Child and Family Services Agency

Subject: GAO Draft Report on the District's Child Welfare System

I would like to take this opportunity to thank you for sending us a copy of the draft report so that we could have an opportunity to review the report and offer corrections, clarifications, or changes to the proposed report. In general we found the report to be balanced in the overall presentation in that it cited the concerns and issues and usually referenced the progress or actions that were being taken by the Agency to address the issue. However, our review did find a number of instances where we believe that there was either a lack of clarity as to the information that was presented or a misunderstanding about the information that was made available for your review. In order to make it somewhat easier for you to follow, I will cite the page number and the section and then provide our comment.

Now on page 8.

1. Page 6 The sequencing of events pertinent to the receivership should be as follows:
  - a. Class Action suit was filed in 1989
  - b. Opinion was delivered in 1991
  - c. Modified Final Order was issued in 1991
  - d. MFO modified in 1992 along with Implementation Plan in 1992
  - e. Receivership was established in 1995

Now on page 7.

2. Page 7 Change wording to "primary responsibility for **"investigating** neglect cases" and **"investigating** abuse cases."

Now on page 7.

3. Page 8 It is incorrect to draw a comparison between the number of cases in care and the number of workers. The ratio of staffing is not equal among all programs and this statement gives the impression that the short fall in workers is totally related to

Ernestine Jones, General Receiver  
202-442-6100 • Fax: 202-442-6141  
E-mail: efjones@cfsa-dc.org

Appendix IV  
Comments From the Child and Family  
Services Agency

Now on pages 10, 15, and  
16.

foster care and it is not. Total number of children in care is different than total number of children in foster care.

4. Pages 11, 19, 20 1. Consistently throughout the report you imply that there were no policies, procedures or policy manual governing the various programs and services. This is an incorrect conclusion to be drawn from the information that we provided to your office. It is incorrect to state that the policy manual was not made final and distributed to staff until October 2000. There has been a policy manual in effect since 1995 when one of the limited receivers was charged with the responsibility of preparing the document. The policy manual has been given to new employees as they came into the agency and all program managers and supervisors have copies of the policies and procedures. Circular letters were used to augment the policies as you point out and were to be used in concert with the existing policies and procedures. We believe that it is an incorrect conclusion to be drawn that policies were not available before October, 2000. What we achieved in October was the development of an on-line version of the policy manual (heretofore available in paper format) thereby making it easier to handle changes and eliminating the need to issue circular letters as the way to update the manual. All programs have written policies and procedures. All have now been implemented on-line for staff use. An ongoing practice is to review each and update and/or make changes as needed. Updates and changes are continuing to be made, a process that will continue throughout the life of the agency. The Office of Planning, Policy, and Program Support is assigned this responsibility and has drafted a master schedule to reflect the process for ongoing review, changes, new procedures and considerations for training.

We have also adjusted the chart to reflect the fact that we do have policies and procedures in most of our programs. If you want further clarification about any of them feel free to get back to us.

Now on page 11.

5. Page 13 In footnote #12 you reference DHS – it should instead be **DCOP (DC Office of Personnel)**. There are two additional notations that we would ask to be inserted into the report.
- a. Regarding retention it should be noted that in the FY 2001 budget, CFSA requested funding to support compensation incentives. Also, the Agency has established the Social Worker Associate position which requires staff with a Bachelor in Social Work (BSW) and a D.C. license to deliver some services required by the MFO.
  - b. In order to address long term managerial/supervisory problems, CFSA converted all managerial and supervisory employees from the Career Service to the Management Supervisory Service (MSS). This new service is designed to give management a new tool to use to hold managers and supervisors accountable for implementing the goals and objectives of the Agency. In addition the agency is in the process of implementing a new Performance Management Program (PMP) that objectively evaluates the employees' competencies and goal achievements.

**Appendix IV  
Comments From the Child and Family  
Services Agency**

Now on page 12.

6. Pages 14, 15 CFSA has established a full-time training unit, so the sentence that begins “While CFSA has largely met these requirements....” Should read, “CFSA met these requirements.” Prior to the establishment of the VCU\CFSA Training Project, CFSA’s Office of Training and Staff Development (one Administrator/Trainer, one full-time trainer, and two secretaries made up the office) managed the Agency’s pre-service and in-service training program. Training consultants were brought in to provide some of the training.

Between May 1999 and September 2000 (when full time staff were hired) the Training Project has trained approximately 2000 social work staff. Between May 2000 and October 2000 (when the Training Project took over pre-service training) approximately 135 new hires have attended the 80-hour Orientation to Child Welfare Training program.

In August 1999 the Training Project designed a two-day course on risk assessment and scheduled the course on 9 separate occasions especially for Intake staff. This course was cancelled on at least three occasions, at that time, due to poor staff attendance. It is being offered, at this time, for other staff with similar problems being experienced in attendance. Since April 2000 no courses have had to be cancelled but attendance is sometimes lower than expected.

Now on page 13.

7. Page 16 Regarding the issue of caseload reduction, we believe that you do not give adequate recognition to the fact that the decision to close cases rests primarily with the courts who have been historically slow in their willingness to close cases.

Now on page 14.

8. Page 17 We are not clear as to how you arrived at the numbers for the average caseload. It is somewhat misleading to use an average for a team rather than an average caseload per worker per program area. To average by team does not reflect the process that allows for shifting of cases from one unit to another to achieve a better ratio per worker. For example if one supervisory unit has an excess number and another unit does not (assuming that both have a full compliment of workers) cases could be adjusted to provide a better overall ratio of cases per worker. Using the range distorts the actual experience.

Now on page 20.

9. Page 26 The chart that you have provided to detail the case completion rate for intake investigations does not reflect the fact that these numbers include the investigations of abuse that are handled by the police department. The completion rate for neglect is substantially higher than the rate for abuse and that needs to be reflected if you are going to portray the statistics in a chart format for comparison purposes.

Now on page 22.

10. Page 28 The sentence regarding the 62 children in congregate care should reflect that the 62 children were under age 6.

**Appendix IV  
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Services Agency**

Now on pages 22-23.

11. Page 29 In the last paragraph you reference that we have completed the study of the Family to Family project. We have implemented this project. There is a full time project director and support staff funded through the Casey Foundation. That project was kicked off in June, 2000.

Now on pages 24-25.

12. Page 32 The statement that “no corrective action has been taken to improve contractor performance” is incorrect. Not only have actions been taken in those situations warranting it, we have taken appropriate actions with several facilities including non-renewal of contracts, ceasing placements until corrective actions have being made and removal of children where concern about safety was in question. Social work expertise is not the experience required to monitor for contract compliance. However, feedback from the social worker regarding the care of the children is essential in evaluating the overall performance and that information is solicited whenever there is a contract performance issue.

Now on page 25.

13. Page 33 Purchase-of-service agreements are written specific to a child and often are the result of direct orders from the court. As such the terms and conditions are set by the order which is usually related to the services to be provided. In this situation the determination of the effectiveness of a specific service to meet a child’s need is with the social worker, not the contract monitor. You are correct that there is no contract monitor assigned to specifically look at compliance with the terms and conditions of the PSA. These contracts are usually time as well as service specific. It is the intent of the Agency to develop a process for monitoring these contracts more closely in the future. We believe that it is important to note this distinction.

Now on page 29.

14. Page 39 It is our understanding that the compliance review for the District of Columbia has now been moved to August, 2000.

Now on page 33.

15. Page 45 The chart does not include our Intensive Family Services program which is a major service program aimed at keeping families together. Also, it does not include the private organizations that play a critical part in our service delivery. We would suggest that you include: Casey Foundation, Casey Family Program, Freddie Mac Foundation, and the Center for Court Excellence. There are others but these are major supporters of new service initiatives.

Now on page 39.

16. Page 54 In accordance with the consent agreement developed in October 2000 between the District government and the plaintiffs, a process will be developed as a part of the transition to ensure that the LaShawn employees will be transferred to the District government as a part of ending the receivership.

Now on pages 44-51.

17. Pages 61-70 We have noted on the form (see attached) those areas where we disagree with the conclusion that you have drawn and have inserted the check mark in the section that we believe more accurately reflects the status. It is worth noting that most of our disagreement is in the determination of the availability of policies and procedures. As noted above we believe that such has been and continues to be

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**Appendix IV  
Comments From the Child and Family  
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available for staff, the difference is in it being available in paper format or via electronic format.

We hope that you will give our comments careful consideration and will adjust your report accordingly. We believe that these changes will ensure that the report will be more accurate in depicting the status of the Agency. Thank you for your attention to our comments on this draft report.

Cc: Sondra Jackson  
Milton Grady  
Judith Meltzer

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# Related GAO Products

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*Child Welfare: New Financing and Service Strategies Hold Promise, but Effects Unknown* (GAO/T-HEHS-00-158, July 20, 2000).

*Foster Care: HHS Should Ensure That Juvenile Justice Placements Are Reviewed* (GAO/HEHS-00-42, June 9, 2000).

*Foster Care: Status of the District of Columbia's Child Welfare System Reform Efforts* (GAO/T-HEHS-00-109, May 5, 2000).

*Foster Care: States' Early Experiences Implementing the Adoption and Safe Families Act* (GAO/HEHS-00-1, Dec. 22, 1999).

*Foster Care: Effectiveness of Independent Living Services Unknown* (GAO/HEHS-00-13, Nov. 5, 1999).

*Foster Care: HHS Could Better Facilitate the Interjurisdictional Adoption Process* (GAO/HEHS-00-12, Nov. 19, 1999).

*Management Reform: Elements of Successful Improvement Initiatives* (GAO/T-GGD-00-26, Oct. 15, 1999).

*Foster Care: Kinship Care Quality and Permanency Issues* (GAO/HEHS-99-32, May 6, 1999).

*Foster Care: Increases in Adoption Rates* (GAO/HEHS-99-114R, Apr. 20, 1999).

*Juvenile Courts: Reforms Aim to Better Serve Maltreated Children* (GAO/HEHS-99-13, Jan. 11, 1999).

*Child Welfare: Early Experiences Implementing a Managed Care Approach* (GAO/HEHS-99-8, Oct. 21, 1998).

*Foster Care: Agencies Face Challenges Securing Stable Homes for Children of Substance Abusers* (GAO/HEHS-98-182, Sept. 30, 1998).

*Child Protective Services: Complex Challenges Require New Strategies* (GAO/HEHS-97-115, July 21, 1997).

*Child Welfare: States' Progress in Implementing Family Preservation and Support Services* (GAO/HEHS-97-34, Feb. 18, 1997).

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