

**NORTH CAROLINA DEPARTMENT OF HEALTH AND HUMAN SERVICES  
DIVISION OF SOCIAL SERVICES  
CHILD WELFARE SERVICES**

**Union County Division of Social Services  
Child Welfare Program  
Evaluation Report**

**Background and Purpose**

On November 18, 2013, the Union County Department of Human Services requested an evaluation by the North Carolina Division of Social Services (NCDSS) of the Union County Division of Social Services' (UCDSS) child welfare practices and protocols. The request was made in the wake of an agency supervisor being arrested on a child abuse charge. The goal of the evaluation was to develop a plan to improve the delivery of child welfare services. This plan would also identify action steps whereby the NCDSS would provide technical assistance.

This review is one of several evaluations and investigations being conducted in Union County. These other evaluations include criminal investigations and personnel actions which are beyond the scope and authority of the NCDSS. The NCDSS specifically evaluates the delivery of services in adherence to law, administrative rules and policy. These services are commonly identified as the following: Child Protective Services, In-Home Child Protective Services, Foster Care Services, Adoption, and Foster Home Licensing.

**Initial Evaluation**

On November 20, 2013, the NCDSS began an initial evaluation of the child welfare program and management of conflict of interest cases, protocols in child protective services intake, and an overview of foster care and foster home licensing practices. The review team, consisting of 3 NCDSS staff, focused on the required procedures and best practices in child welfare using standardized review tools.

The team reviewed 2 conflict of interest cases, 4 child protective services intake reports, two child protective services assessments, 10 foster care records and a foster home licensing record. The initial evaluation resulted in the development of a more comprehensive review of the UCDSS program areas as indicated below.

**Program Evaluation**

Following the initial evaluation, the NCDSS prioritized child protective services intake and assessment practices and management of conflict of interest cases since 2010 for subsequent review. A team returned to Union County January 6-9, 2014 and reviewed a random selection of 62 child protective services reports that the UCDSS did not accept for assessment (screened out); a random sample of 25 child protective services assessments after 2010; and 6 conflict of interest child protective services assessments that originated in Union County.

The review included examination of records for intake decisions, initiation of assessments, safety planning, statutorily required notices to the reporter, District Attorney and law enforcement, interviews with victim children, parents, and collateral contacts, home visits and face to face contacts, supervision, and decision making.

## **Key Findings/Observations and Recommendations**

This report contains 7 key findings/observations and recommendations. Each set of key findings/observations and recommendations contain a subset of bulleted detail. Key findings/observations 3, 4, and 7 contain introductory information so as to give context for the subset. This information is generally a brief description of state and federal child welfare law, rule, policy or practice guidance.

The 7 key findings/observations and recommendations centered on the following themes:

Finding/Observation 1: Agency Leadership

Finding/Observation 2: Quality Assurance

Finding/Observation 3: Child Protective Services Intake

Finding/Observation 4: Timing and Thoroughness of Child Protective Services Assessments

Finding/Observation 5: Outcomes of Child Protective Services Assessments

Finding/Observation 6: Supervision of Front Line Staff

Finding/Observation 7: Conflict of Interest Protocols

### **Finding/Observation 1: Agency Leadership**

- There has been considerable turnover in the Director of Social Services position over the last 5 years with long periods of oversight by an Interim Director. The current top leadership has been in place since August, 2013.
- The UCDSS was a pilot agency for the Reaching for Excellence and Accountability in Practice (REAP) project in 2010 aimed towards becoming an outcome focused agency employing a continuous quality improvement approach to improve outcomes for children and families involved with the child welfare system. In the absence of leadership, this effort stalled.

### **Recommendations: Agency Leadership**

- UCDSS re-engage in the REAP Project as a means to:
  - learn new techniques and practice models from peers in other counties;
  - engage other community agencies to enhance services to children and families in Union County;
- Develop and implement an improvement plan based on the findings of this review and reviews of other program areas which will take place in coming months.

### **Finding/Observation 2: Quality Assurance**

- A child welfare case tracking system and quality assurance system is not yet fully established. Development of an internal quality assurance system began in October, 2013. It was in its formative stages at the time this review began. This quality assurance is managed outside of the child welfare section which provides objectivity in child welfare case record reviews.

### **Recommendations: Quality Assurance**

- The UCDSS should move to fully implement the quality assurance system. This includes a regular schedule for case reviews. A quality assurance system will provide an internal review of records and decisions to identify any practice issues for management, and provide feedback to social workers and their supervisors.

- NCDSS will provide technical assistance to the UCDSS
  - to assure that quality assurance tools are consistent with North Carolina statute, rule, policy and best practices;
  - by providing periodic quality control review of the quality assurance system to validate its integrity and effectiveness;
  - by providing guidance to create a system to use the information gained as a continuous quality improvement and planning effort through feedback to management, supervisors and social workers.

**Finding/Observation 3: Child Protective Services Intake**

North Carolina requires the use of the Child Protective Services (CPS) Intake Report <http://info.dhhs.state.nc.us/olm/forms/dss/dss-1402.pdf> as the guide for interviewing and recording information when a call from someone who suspects child abuse or neglect (the reporter) is received by a county social services agency. The structured tool prompts intake social workers to ask specific questions and document responses to ensure all information known by the reporter is available to make the decision to accept the report for assessment based on maltreatment defined under General Statute §7B-101.

When screening the child protective services reports, the use of a Structured Decision-Making model outlined in policy is used to guide intake staff through the process of determining if a report meets statutory criteria for an assessment based on the information gathered on the CPS Intake Report.

- Child Protective Services Intake social workers often went through a 2 step process of handwriting the reports and then later typing them, a duplication of work.
- When the reports were typewritten, they did not always contain the same information.
- The content of many reports appears to be a recording of what reporters were telling the intake social workers rather than the guided interview of the reporter required by policy. As a result, all information was not always gathered from reporters.
- As a result of the lack of gathered information, it was difficult to ascertain whether the correct decision was made in accepting or screening out a report.
- The structured intake process did not appear to be consistently utilized by child protective services intake social workers and supervisors based on the incomplete documentation on the CPS Intake Report.

**Recommendations: Child Protective Services Intake**

- The UCDSS must adhere to policy outlined in Chapter VIII of the Family Services Manual: Child Protective Services Section 1407 – Structured Intake.
- To assure effectiveness of this structured review with intake staff and supervisors, the UCDSS should establish a review schedule for the quality assurance team to review a sample of screened out reports and provide regular feedback to the UCDSS management.
- The NCDSS will provide technical assistance to the UCDSS
  - in the application of the NCDSS Structured Intake policy.
  - to review to establish a means for the quality assurance findings to be reviewed with intake social workers and supervisors and corrective action plans developed if needed;
  - on the administration and monitoring of the review tools;
  - in providing guidance to supervisors and social workers to effectively use feedback from the review tools.

#### **Finding/Observation 4: Timing and Thoroughness of Child Protective Services Assessments**

When reports of suspected child abuse, neglect, or dependency are received, the Director of a county social services agency is charged with conducting a prompt and thorough assessment of the allegations in accordance with General Statute §7B-302. The NCDSS outlines required actions and best practices in Chapter VIII of the Family Services Manual. Although the General Statutes do not prescribe a time frame in which to complete assessments, the NCDSS recommends time frames in which assessments should be completed, but decisions must only be made when all relevant information is gathered and processed to make an informed decision.

- The UCDSS completed a high percentage of reports within the time frames, 79.1%, compared to North Carolina at 61.4%.
- Some assessments lacked reasonable efforts to gather all of the information necessary to make informed decisions, including:
  - unsupported delays in seeing alleged victim children and their families within required time frames;
  - ongoing home visits and contacts with families throughout the assessment process to fully evaluate risk to children;
  - inadequate or incomplete interviews with potential victim children regarding their circumstances;
  - lack of follow up with collateral contacts, such as school personnel, medical providers, and other professionals and family members that could have critical information.
- It could not be determined whether the data on completing assessments within time frames noted above were the result of rushed completion of assessments or priority given to meeting the state recommendations.

#### **Recommendations: Timing and Thoroughness of Child Protective Services Assessments**

- The UCDSS should implement use of a case tracking log in all assessments for social workers to clearly document the tasks completed.
- The NCDSS will provide technical assistance to
  - select a model for the case tracking log that best suits the UCDSS;
  - prepare social workers on the use of the tool;
  - coach supervisors on use of the log as a tool for evaluating the quality of the case activities with social workers during regular supervision time and for reviewing case records;
  - develop a process through which the quality assurance team will use the tools as a guide in conducting case reviews.

#### **Finding/Observation 5: Outcomes of Child Protective Service Assessments**

- The UCDSS' rate of assessments resulting in finding of substantiated or in need of services is 13.7% which is below the state's rate of 16.5%. This data alone does not determine if decisions are appropriate or not, but does indicate an area for further exploration and monitoring.
- Documentation to indicate supervisory involvement in decision making was absent. This made it difficult to ascertain during the case reviews the means by which outcome decisions were made at the conclusion of assessments.

- Child protective services assessments are agency cases assigned to social workers, so decisions on outcomes should be agency decisions rather than decisions by individual social workers.
- A means of staffing and documenting case decision making needs to be established.

**Recommendations: Outcomes of Child Protective Services Cases**

- The UCDSS should implement a team staffing system. The child protective services social workers and supervisors will benefit from a team staffing of completed child protective services assessments.
- The NCDSS will provide technical assistance to the UCDSS
  - to create, implement, and sustain a team staffing system.
  - to establish a process by program managers to review a sample of assessments in which case decisions are other than substantiated or in need of services;
  - to establish timely, systematic, and effective feedback from the quality assurance team on case review findings to supervisors, social workers, and management.
- The NCDSS will conduct quality control of the agency quality assurance team to assist in the interpretation of findings to ensure that case decisions are based on thorough and timely information.

**Finding/Observation 6: Supervision of Front Line Staff**

- Documentation of regular supervisory conferences with social workers was lacking. Although the UCDSS has supervisor tools for reviewing records, completed tools were not found in the records.

**Recommendations: Supervision of Front Line Staff**

- The UCDSS should strengthen its supervision protocol for front-line staff. Supervisors are responsible for ensuring social workers complete all necessary tasks and gather sufficient information to make sound decisions at the conclusion of assessments.
- The NCDSS will provide technical assistance to the UCDSS
  - in selecting and implementing use of a supervision tool to provide oversight and feedback to social workers on performance;
  - to establish a regularly scheduled meeting time for child welfare supervisors to provide time for supervisors to review agency protocols for efficiency and effectiveness. In addition, supervisors would receive feedback as a group from quality assurance reviews, review internal continuous quality improvement plans, and a structured time to review program data for opportunities to enhance practice.
- The UCDSS quality assurance team should establish periodic monitoring of the use of the supervision tool. The use and application of the tool will also be periodically monitored by the NCDSS.

**Finding/Observation 7: Conflict of Interest Protocols**

There are instances in which it is not ethical or prudent for a county social services agency to assess reports in which there could be a perceived conflict of interest. The NCDSS provides guidance in Chapter V: Jurisdiction in Child Welfare of the Family Services Manual. In conflict of interest cases, initial responses by counties having the conflict must focus on assuring immediate safety of the alleged

victim child, but not compromise the assessment which must be completed by another county social services agency.

- Instances were found in which the involvement of the UCDSS staff exceeded the required initial safety assessments in managing conflict of interest cases.
- The over-involvement was in part due to demands for additional activities by other counties before they would begin the assessment.

#### **Recommendations: Conflict of Interest Protocols**

- The UCDSS must develop a protocol for screening child protective services reports on employees, guidelines on assessing the initial safety needs of alleged victim children, and prompt engagement of another county to conduct the assessment.
- The NCDSS will provide technical assistance
  - by reviewing the protocol developed by the UCDSS to assure consistency with state law, rule, and policy;
  - to other counties in the area who could potentially conduct these conflict of interest assessments for the UCDSS so as to assure an efficient implementation of the protocol.

#### **Next Steps**

The NCDSS will provide a staff person to develop these findings/observations and recommendations into a plan and assist with implementing actions. This includes working with the UCDSS staff to provide or arrange for any of the training or technical assistance outlined in the plan. The plan will be reviewed weekly for the first 3 months at which time the review schedule will be re-evaluated.