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AUDITOR OF STATE

STATE OF OHIO

CLERMONT COUNTY
CHILDREN'S PROTECTIVE SERVICES
PERFORMANCE AUDIT

NOVEMBER 14, 2000



STATE OF OHIO
OFFICE OF THE AUDITOR

JIM PETRO, AUDITOR OF STATE

To the Clermont County Commissioners, Mr. Steve Wharton, County Administrator, and the citizens of Clermont County,

The State Auditor's Office is pleased to provide the completed performance audit of Clermont County Children's Protective Services' (CPS) policies and procedures. As a component of Clermont County's long-range performance improvement plan, the County requested a performance audit of four departments who have already implemented Managing by Results and activity based costing. The State Auditor's Office conducted this independent review of CPS's policies and procedures with the objective of evaluating the clarity and completeness of CPS policy development and implementation in relation to best practice agencies and programs. Recommendations provided to County management focused on areas where CPS can implement best practices in policy development and implementation, both within the Agency and the community. This performance audit is the second of five performance audits focusing on the four County departments.

The performance audit focused on eight core aspects of CPS's policies and procedures including the completeness of policy manuals and the monitoring of policy implementation, as well as key management functions such as planning, confidentiality and grievance processes, technology utilization, client and community relations, and quality assurance initiatives. These service and operating areas comprise all aspects of CPS management's policy development and implementation functions. The performance audit contains recommendations based on best practices and industry standards for improved structure and development of CPS policies and procedures, as well as numerous commendations highlighting best practices within CPS.

An executive summary has been prepared which includes the project history, purpose and objective of the performance audit, overview of CPS, and summary of each of the eight areas. The executive summary also includes a summary of background information, findings, commendations and recommendations.

Additional copies of this performance audit can be requested by calling the clerk of the bureau at (614) 466-2310 or the toll free number in Columbus, 800-282-0370. In addition, this performance audit can be accessed online through the State Auditor Office's Web site at <http://www.auditor.state.oh.us> by choosing the *on-line audit search* option.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Petro", written over a large, stylized flourish.

JIM PETRO
Auditor of State

November 14, 2000

EXECUTIVE SUMMARY

Project History

In January of 2000, the Clermont County Office of Management and Budget contacted the Auditor of State's Office requesting a performance audit of various County departments. Clermont County has undertaken a performance improvement process to improve accountability to County residents and increase the efficiency of the County's services. As a component of the performance improvement process, the County requested a performance audit of four County departments to determine the efficiency and effectiveness of operations in each department. Meetings between the Auditor of State's Office and County management were held to discuss the scope and objectives of the performance audit.

As a result of these discussions, it was determined that the performance audit would focus on the following areas and departments:

- Facilities Management
- Child Protective Services, Policies and Procedures Establishment and Implementation
- Child Support Enforcement
- Permits Central
- Child Protective Services, Agency Program Operational Assessment

The Children's Protective Services (CPS or the Agency), Policies and Procedures performance audit is the second of five performance audit sections to be released. Each performance audit compares the County to best practice agencies and recommended practices in the specified area. CPS's policies and procedures are compared to policies and procedures maintained by best practice agencies. The objective of a best practice/recommended practice comparison is to assist well-running organizations in performance improvement. This report focuses on the following areas:

- Mission statement, planning functions and long term goals
- Policies and procedures manual
- Methodologies of monitoring the implementation of CPS policies and procedures
- Confidentiality and the grievance process
- Verification of foster care provider licensing
- Appropriateness and potential uses of technology
- Agency interaction and communication with community
- Customer satisfaction and quality assurance initiatives

Agency Overview

Clermont County's Children's Protective Services is a division within the County Department of Job and Family Services (DJFS). Ohio law requires each county to have a Public Children's Services Agency (PCSA) and CPS serves as the PCSA for Clermont County. CPS provides a variety of services to the families and children of Clermont County including investigations of allegations of child abuse, neglect, and dependency; on-going psychological services, parent education and family counseling; foster care and adoption services; and community outreach to improve the quality of life for children and families within the County. The Agency operates under County, state and federal regulations. In 1999, the Agency conducted approximately 1,597 investigations, while an additional 229 cases were deemed Dependency or Information and Referral cases and were referred to another agency for the appropriate services. In addition, the Agency finalized adoptions for 10 children. Approximately 50 staff members are employed within CPS.

Clermont County has undertaken a performance improvement initiative through a Managing for Results program. CPS has instituted some aspects of Managing for Results, including the development of performance measures and a citizen/client questionnaire. However, CPS has not formalized these practices nor incorporated Managing for Results in Agency-specific, long-term planning. CPS primarily uses Unit Plans of Work (UPW) for its short-term planning function, but lacks the formalized means to plan for the long-term. The Agency uses quarterly Child Protection Oversight and Evaluation (CPOE) outcome indicators, activity based costing and weekly case record reviews to monitor Agency quality, but qualitative performance measures have not been developed.

CPS appears to have a strong commitment to public relations and Agency staff members often participate in community relation engagements. CPS relies on the County Commissioners' Public Information Officer (PIO) to distribute information about protective services to the media and the community at large. The Agency could better serve its public relations' needs by developing consumer information brochures which provide explanations of the Agency's various services and programs. As a component of public relations, CPS has developed a highly detailed and specific questionnaire that could provide the Agency with data on numerous issues. However, the questionnaire has not been implemented.

Because many children need specialized therapeutic care not offered by Agency foster parents, CPS contracts with third-party, or network, providers of foster care services. Relying on the network provider's agreement that their homes are licensed has been an area of concern for the Agency and the Agency has removed children from homes in instances where the licenses have lapsed. CPS maintains a written grievance policy with subsequent procedures for those individuals participating in the Agency's programs. The highly detailed and formal grievance procedure provides the Agency with an effective means to mediate between clients and CPS employees.

CPS has not developed a complete in-house manual, detailing all Agency policies and procedures to supplement existing pertinent Ohio Revised Code (ORC) and Ohio Administrative Code (OAC) rules provided by the Ohio Department of Job and Family Services (ODJFS). Often, program operations are based on routinized practice, not written policy, which is learned through observation of peers. However, CPS uses a variety of means to monitor the implementation of Agency policies and procedures including meetings, case record reviews and training sessions. CPS also relies on the ODJFS manual for confidentiality policies, but this does not adequately encompass CPS's current confidentiality needs. Expanded, detailed confidentiality policies may ultimately safeguard and protect CPS from potential lawsuits based on wrong decisions concerning client confidentiality.

The use of technology within CPS is in its infancy. Since the Agency recently received new computers and software from ODJFS, caseworkers are still in the process of familiarizing themselves with the technology. ODJFS installed the new computers in early 1999 and Agency management believes that additional training is needed to help maximize the efficiency and effectiveness of daily operations. CPS does not have an Agency specific Web site or series of pages with associated children's services links. A customized Web site would improve the quality and quantity of information provided to external individuals interested in CPS and issues regarding children's services.

Summary Results

The summary results of the performance audit are contained within pages 1-4 through 1-13. The summary results are followed by overall performance audit information, including a definition of performance audits, the objective and methodology of performance audits and comparisons of key information.

The performance audit addresses Clermont County's Children's Protective Services policies and procedures and focuses on planning and goal setting, policy and procedure manual development, methodologies for monitoring the implementation of policies and procedures, confidentiality and grievance process, foster care licensing verification, appropriateness of technology usage, community relation and quality assurance. Major findings, commendations, and recommendations are provided for each area. A thorough analysis of CPS's policies and procedures, including detailed findings and recommendations, is contained within the corresponding section of the report. All interested parties are encouraged to read the entire report.

The results of this performance audit should not be construed as criticisms of Clermont County's Children's Protective Services. The performance audit should be used as a management tool by Clermont County and CPS to improve operations within the Agency, as the performance audit provides a series of ideas which the County and CPS should consider in its decision-making process.

Mission Statement, Planning Function and Long-Term Goals

Findings: CPS's mission statement explains the Agency's general purpose as providing a comprehensive system of assessing risk of abused, neglected and dependent children. The mission statement is displayed in the lobby of CPS and also conveyed in the Agency's annual report. The Agency's mission statement undergoes periodic updates and revisions to reflect major changes in child welfare policy. In its present form, the mission of CPS is represented by a process or means-based statement. The Agency uses a process-oriented mission that focuses on the activities it needs to accomplish, rather than the outcome of protection that it helps to ensure.

CPS does not have a current formal strategic plan to serve as a guide for the long-term development and enhancement of Agency functions. In the past, however, the Agency was included in County-wide strategic plans whereby strategic initiatives were implemented and continue in Agency practice, but the plans have since become outdated. Currently, CPS uses Unit Plans of Work (UPW) as their primary goal-setting vehicle. UPWs are derived from a previous County-wide strategic plan, and are currently customized by all County departments. UPWs are established annually and reviewed periodically by CPS management staff.

CPS management measures Agency performance using case record reviews, activity based costing and CPOE indicators. However, CPS has not developed a formalized process for identifying measurable outcomes on an ongoing basis, reporting results to County management and the community and incorporating the results into the Agency's decision making process. The Agency primarily uses CPOE indicators as benchmarks. CPOE is a state monitored quality assurance program that incorporates continuous quality improvement and outcome measures for County PCSAs. Although the CPOE program enables CPS to measure its operational performance, the program is limited because the data for the outcome indicators is not processed at the state level in a timely fashion.

Commendations: CPS routinely communicates its mission and accompanying values to the community and within the Agency itself. By publicizing the mission statement, the Agency is better able to garner support from the community and key stakeholders who have a vested interest in Children's Protective Services.

The Agency was responsive in revising its mission statement to reflect the changing nature of child welfare. The Agency's mission statement illustrates the major tenets of personal responsibility and self-sufficiency inherent in recent welfare reform legislation. By tailoring the mission statement to reflect these values, CPS orients its vision with current national philosophies. By participating in County-wide strategic plans, it became obvious that continued collaboration between children's services agencies would be necessary to succeed in protecting abused and neglected children. Involving key stakeholders from various agencies and the community in the planning process was also an effective strategy for creating a sense of ownership in the plan. This open dialogue between

agencies and with community members increased accountability and improved the Agency's ability to provide appropriate and effective services.

Recommendations: CPS should consider revising the current mission statement to reflect a more outcome-based approach. The focus of an agency's mission statement should not be on the activities it needs to accomplish, but rather it should convey the ultimate reason for an agency's existence.

CPS should place a high priority on formulating a written strategic plan that includes objectives, definitions of desired outcomes, and realistic time lines for implementation. Agency goals should be an integral part of an action plan, designed to implement identified strategic initiatives. UPWs could become short-term action plans in a comprehensive long-term strategic plan. To increase accountability, however, CPS should include action steps whereby specific individuals would be responsible for an action step's completion.

CPS should also develop a formal methodology to obtain, analyze and report the results of internal and external performance beyond what is measured using CPOE indicators, activity based costing and case record reviews. It is important that the performance measures be aligned with the Agency's objectives to effectively evaluate performance. Also, CPS should design a quality improvement system to develop, assess and report outcome measures and the Agency should develop a set of measurable indicators for each target outcome by which progress may be assessed.

Policies and Procedures Manual

Findings: CPS's activities are directed and managed according to formally established written policies and procedures. The Agency uses the Family, Children and Adult Services Manual issued by the Ohio Department of Job and Family Services (ODJFS). The manual contains all ORC and OAC rules applicable to the programs administered by CPS and has recently become available on CD-ROM. Periodically, ODJFS sends the Agency updated rules reflecting any changes to the ORC and OAC. In addition, the Agency uses a manual designed for the Permanency Planning Unit. The manual contains policies and procedures governing adoption, foster care, and Adopt Ohio programs. Also, the Agency uses the CPS in-house Policies and Procedures Manual which supplements applicable ORC and OAC rules and is customized for the Agency. The manual contains only 18 policies and procedures and they are not organized by program or unit function.

The Agency's manuals are located in the offices of the unit supervisors and are accessible to staff members, yet they are cumbersome in size. In addition, commonly used forms are accessible on the staff's computers, but the Agency has yet to place policies and procedures online. The manuals are periodically updated to reflect revisions or changes in policies and procedures. However, old policies and procedures are not always removed from the manuals. Usually, revisions or updated policies and procedures are placed in the front of the manuals which contribute to the manuals' volume.

Recommendations: CPS should consider expanding the in-house manual to include additional applicable policies and procedures. This process could be included in the strategic plan as an intended goal with an attached action plan. CPS should also consider reorganizing its in-house manual to reflect the primary functions performed by the Agency, including: intake, investigations, ongoing, adoption, and foster care. This arrangement would allow staff members in particular units to have smaller, more practical manuals specifically tailored for their jobs. Additionally, orientation materials for new employees could be easily derived from this organizational format.

The Agency's manuals should be streamlined as much as possible so staff members are not confused as to which policy or procedure is most current. Additionally, CPS should consider placing the most often referenced policies and procedures online to increase accessibility and improve efficiency. CPS should also consider archiving old policies and procedures to reduce the size of the manuals. By removing old policies, the potential for confusion is reduced because staff members would utilize manuals which contain only current policies.

Agency Methodology for Monitoring the Implementation of Policies and Procedures

Findings: The Agency provides formal and informal training to staff so new policies and procedures can be implemented consistently. Pursuant to OAC §5153.122, CPS staff members are required to receive 90 hours of core in-service training during the first year of employment. The monitoring of the application of CPS policies and procedures lies primarily with unit supervisors. There are weekly and bi-weekly meetings between caseworkers and unit supervisors whereby new policies and procedures are discussed. Agency-wide meetings are occasionally held to go over new or revised policies and procedures.

Monthly case record reviews are conducted by unit supervisors to help ensure the consistent application of policies and procedures. The case record reviews provide the Agency with a formal mechanism to help ensure the consistent application of policies and procedures. In addition to verbal communication, management staff sends written notice to caseworkers outlining new policies and procedures and providing guidance on their implementation.

Caseworkers make little or no distinction between practices based on policy and practices based on procedure. However, staff members assert that the Agency's policies and procedures are easy to understand and well-defined. Questions concerning policies and procedures are directed toward unit supervisors or veteran employees. Staff members also stated that management is always open to discussion regarding Agency policies and procedures. Caseworkers affirm that the policies and procedures help in standardizing everyday operations and providing guidance for effective service delivery.

For the most part, the County Commissioners Office is not involved in the development or revision of programmatic policies and procedures. The majority of policies and procedures that guide the

Agency are provided by ODJFS and the County DJFS. CPS does not have a committee to develop or revise Agency policies and procedures. Currently, this function is performed by the deputy director and unit supervisors who hold meetings on a daily basis.

Commendations: CPS uses a variety of means to monitor the implementation of Agency policies and procedures. Through meetings, case record reviews and training sessions, unit supervisors are able to successfully monitor the application of the policies and procedures which guide the Agency in providing effective services to children and their families.

Recommendations: CPS management should perform a study to determine which Agency procedures are based on formal policies versus informal practices. Once the procedures based on routinized practices are identified, management staff should consider which procedures should be documented under a formal policy.

Management should train employees on Agency procedures once they have been formalized as Agency policies. By training new employees on documented procedures based on Agency policies, CPS would be more assured that various practices are consistently applied. The consistent application of policies and procedures helps to ensure that all clients receive a standard level of service.

The Agency should also appoint a committee to periodically review Agency policies and procedures and make recommendations for the development and/or revision of policies and procedures. The committee would report its findings and recommendations to the deputy director, who could take the suggested policy revisions to the director of the County DJFS for approval.

Confidentiality and Grievance Process

Findings: CPS has a responsibility to the public to respect and uphold the privacy of children and families. Furthermore, the Agency must hold in confidence all information obtained throughout the course of professional service. Sharing of confidential information is done in a manner consistent with federal and State law, as well as the individual's right to privacy.

CPS does not maintain a comprehensive internal written policy governing confidentiality. Rather, the Agency uses the ODJFS Public Records and Confidentiality Laws manual that provides guidance concerning the release of information by children's service agencies relating to child abuse and neglect. The Agency's staff attorney holds periodic training sessions to help ensure that staff members are aware of the specific requirements relating to issues of confidentiality. CPS also requires new employees to sign an agreement stating that they have been informed of the Agency's policies and procedures on confidentiality, the majority of which are contained in the ODJFS manual.

CPS is required by OAC §5101:2-5-11 to provide birth parents, foster or adoptive parents, legal guardians, children, and alleged perpetrators of child abuse or neglect an opportunity for an

administrative review of conflicts, grievances, case resolutions or dispositions. While there are specific steps involved in resolving grievances, CPS classifies the process into two categories, informal and formal, with a preference to resolve the complaint/grievance at the informal level. Written grievances and verbal complaints received by CPS are processed and documented in the related case file. However, there is no centralized compilation of the grievances received by CPS. In addition, Clermont County CPS does not publish grievance information in a brochure for clients, nor is the grievance policy posted on the County Web site.

A program has also been established by the County Commissioners called Clermont Cares whereby individuals who have a complaint with regards to CPS may voice their concerns to the Commissioners. The program was originally established so the Commissioners could respond to any complaint regarding the County's agencies.

Commendations: The Agency's training sessions on confidentiality ensure that staff members are aware of the specific requirements associated with Ohio confidentiality laws. Furthermore, periodic training sessions prepare caseworkers in making appropriate decisions involving client confidentiality. Informed decision making on confidentiality issues enhances the safety and protection of children and reporters of abuse, and protects Agency employees from potential liability issues.

CPS maintains an effective written grievance policy with subsequent procedures for those individuals participating in the Agency's programs. CPS meets the criteria for an effective grievance process by using, for example, established time frames for the initiation and completion of grievances and by having designated staff members responsible for conducting the formal grievance hearing. The Agency's formally established grievance process gives clients an avenue to express criticism about the Agency's delivery of services. The written grievance policy provides complainants of CPS with an impartial forum to seek redress of grievances.

Recommendations: CPS should consider developing a comprehensive written internal policy with associated procedures on confidentiality. CPS should also consider developing a pamphlet that informs clients of their rights regarding complaints and grievances of Agency services.

The various methods whereby clients may seek a redress of grievances should be explained by caseworkers and made available upon a client's first visit to the Agency. CPS should consider displaying the titles and phone numbers of the persons responsible for addressing client complaints and grievances in the lobby. In addition, the Agency should display information about the Clermont Cares program and the phone numbers of the persons at the Commissioner's office responsible for handling complaints and grievances. Information on client's rights to complain should also be provided to visitors of the Agency's Web site.

CPS should initiate the necessary procedures to create and maintain a centralized grievance database. All relevant information about the grievance should be captured by the hearing officer in specialized case management software.

Verification of the Licensing of Foster Care Providers

Findings: All County administered foster homes contracted by the Agency must have a valid foster care license issued by ODJFS and the Agency must complete a home assessment. Because many children need specialized therapeutic care not offered by Agency foster parents, CPS contracts with third-party, or network, providers of foster care services. In FY 1999, approximately 56 percent of the children in the Agency's custody were placed with network providers while the remainder of children were placed in County administered foster homes. Third-party providers have their own network license, issued by ODJFS; this license gives them the authority to recommend foster parents for licensure within their own network. Relying on the network provider's license has been an area of concern for the Agency. In the past, CPS has removed children from network foster homes because the Agency discovered that the foster parent's license had expired.

The Agency administers 53 foster homes within its own network and contracts with approximately 28 private foster care agencies. Each contract follows a standard format whereby guidelines are established to facilitate the purchase and delivery of services between CPS and the private foster care agencies. In order to monitor the financial activities of the contracted private agencies, several standardized provisions have been included in the contracts for the purpose of financial oversight. However, recent AOS audits of Montgomery and Franklin County private and public foster care agencies have revealed financial monitoring deficiencies contained in contracts between PCSA's and private network service providers.

Recommendations: CPS should consider requiring network providers to submit a valid copy of a foster home's license as a component of the contractual agreement. This policy should be stipulated in the various contracts that CPS has with the network providers. CPS should record the license expiration date in the Agency's FACSIS database and should ensure that all license renewals are also recorded. This would ensure that a valid license exists at the time the caseworker decides on the location of the placement.

CPS should track foster home licenses on an ongoing basis. Data should include: the date the home was licensed, the number of children the home can accommodate, the level of services available in the home and the license expiration date. The network provider or the foster home itself should furnish CPS with a photocopy or facsimile of the renewal as soon as it is received from ODJFS. If licensure problems are identified within a particular provider's network, CPS could further investigate to reveal any additional licensure problems.

In its role as the County Agency responsible for the administration of foster care, CPS and its contract negotiator must take the necessary measures to close gaps in monitoring and oversight of private foster care providers. The County DJFS, CPS and its contract negotiator should implement financial monitoring and oversight procedures to reduce management control weaknesses over foster care reimbursements and services. For example, the Agency should design and implement an effective

system of program monitoring of private foster care agencies to ensure fiscal accountability and program compliance that includes desk reviews of all cost reports and periodic site visits.

Appropriateness and Potential Uses of Technology

Findings: In FY 1999, ODJFS provided the Agency with desktop computers, giving caseworkers and management staff access to the statewide ODJFS network. Training on the new computers was provided on an individual basis for staff members by in-house technical support staff, but neither the E-mail system nor other state-supplied software is being used to the fullest extent. Employees have access to Corel suite software, which includes word processing, spreadsheet, database, graphics and calendar applications. The Corel Paradox database program could be used to track grievances, but the Agency does not use the database function of the software. CPS does not have a strategic technology plan whereby long-term technology goals could be formalized with specifically designated parties responsible for their implementation.

The Agency also has laptop computers available for caseworkers who are working in the field. However, they are not being fully utilized. Based on interviews with various caseworkers and in-house technical staff, caseworkers have found it easier to manually write out information and then return to the office to enter it on their desktop workstations. Agency caseworkers are not able to remotely access the Families and Children's Service Information System (FACSIS) with the use of the laptop computers.

The Agency uses the FACSIS software supplied by ODJFS to report management information, compliance data, case tracking data, data to support child welfare program evaluations and data to support the Title IV-E payment system. The software is a DOS-based data entry system that cannot perform simple case management processes, such as recording and tracking participant performance. Over the last several years, ODJFS has been developing an upgraded version of FACSIS, called the Statewide Automated Child Welfare Information System (SACWIS), which was to provide children's services agencies with improved technology, but the program has not yet been implemented. ODJFS has established the Executive Leadership Committee (ELC), under the FACSIS/SACWIS project, to design new case management software for county children's services agencies and to address issues relating to compatibility and conversion to the new state system. Other county PCSAs have developed their own case management software systems because of the delays associated with the release of SACWIS. Some of the larger metro children's services agencies with growing caseloads have realized the need for case management software to assist management in improving service delivery. CPS has not explored the development of case management software in-house.

CPS has a Web page that describes its basic functions on the Clermont County Web site, but it cannot be accessed through children's service links. CPS management stated that the Agency has not developed a customized Web site because the majority of its clientele does not have access to computers or the Internet.

Recommendations: CPS management staff should require caseworkers to undergo formal training on the various software applications available on the state computers. Management staff should require caseworkers to take full advantage of the available training resources to help maximize the efficiency and effectiveness of daily operations. CPS should also use the Corel software as a tool to better manage Agency processes.

The Agency should implement a case management software system with the necessary functionality to effectively track and manage case data. Whether the Agency chooses to develop its own case management software or rely on state-released software, like FAPT, CPS needs the technological means to compile, track and report case management information.

Other recommendations include:

- The Agency should consider designating the laptop computers to the investigative caseworkers who work most often outside of the office. The Agency should also install docking stations, linked to the ODJFS network, for times when the investigative workers are in the office.
- In conjunction with the County DJFS and the County Information Systems Department (ISD), CPS should identify its technology needs and establish goals which would be incorporated into the proposed strategic plan.
- CPS should consider developing a customized Web site to improve the quality and quantity of information provided to external individuals interested in the Agency, such as community members and others interested in issues related to children services.

Agency Interaction and Communication with the Community

Findings: CPS uses a variety of means to communicate its mission and objectives with the community. The Agency provides speakers to community groups, sets up booths at the County fair and area shopping malls to help distribute information about its services, and contributes to the County newsletter. However, CPS does not use consumer information brochures which provide explanations of the Agency's various services and programs and help in promoting the Agency's role in the community.

CPS relies on the County Commissioners' Public Information Officer to distribute information about protective services to the media and the community at large. The position was recently filled, yet it was vacant for approximately nine months and throughout the course of the audit. While the position remained vacant, the Agency used its staff attorney for public relations. According to the position's vacancy announcement, the Clermont County Public Information Officer is responsible for the development and production of public information communication of County programs, projects and

services. Decisions that PCSAs make on a daily basis are often based on court decisions removing children from their homes. Clients are often distressed and filled with emotion, creating hostility between clients and children's services agencies. These types of situations necessitate a public relations employee to not only deal with bad publicity, but to emphasize the importance of PCSAs in protecting a county's children.

Commendations: CPS management staff actively participate in numerous public relation engagements, informing the community about the Agency's services and programs. By actively participating in public relation engagements, the Agency is better able to garner support from the community for its mission of protecting children from abuse and neglect.

Recommendations: CPS management staff should identify key public relations objectives which would contribute to the accomplishment of the Agency's mission and goals. Upon the identification of public relations objectives, the Agency should determine whether these objectives could be performed by existing in-house staff and the County Public Information Officer. At this point, the Agency should assess the need for a full-time permanent position dedicated to performing public relations solely for CPS.

CPS should also consider formulating additional job duties designated for the County Commissioner's new media relations employee, in order to promote CPS and its mission. The management team could collectively develop new plans and initiatives which would enhance the Agency's role in the community. Furthermore, CPS should develop consumer information brochures describing the Agency's purpose, services and operations to distribute to all current and new clients.

Customer Satisfaction and Quality Assurance Initiatives

Findings: In order to assess customer satisfaction levels, CPS has developed a citizen/client questionnaire based on the lessons from the Managing for Results program. The questionnaire, developed by CPS, contains a series of statements that describe the services provided by the Agency's caseworkers. Clients are given five options to assess the services provided by the caseworkers as well as open-ended questions so clients can provide detailed evaluative responses. Although the implementation of the questionnaire has been delayed by the Commissioners, clients will be given the opportunity to provide comprehensive assessments of Agency services.

CPS management staff also conduct case record reviews in order to ensure the quality of services provided by Agency caseworkers. Although ODJFS requires Semi-annual Administrative Reviews (SAR) for children in placement and annual reviews for all open cases, CPS has developed a more stringent policy requiring case record reviews on a monthly basis for all of its cases. Moreover, case record reviews within the Intake and Ongoing Units are conducted on a weekly basis. The Agency uses a standardized review document, customized for each of its units. The review document enables unit supervisors to assess the level and accuracy of case dictation and to determine if certain in-house

policies and standards have been achieved. Unit supervisors use the compiled results of case record reviews to produce monthly reports which indicate the current status of all Agency cases and their level of compliance with state regulations and in-house policies and procedures.

CPS does not have a formally established quality assurance committee to oversee and monitor various efforts designed to improve the quality of Agency services. Improvement initiatives, like the casework review process and the development of the citizen/client questionnaire, are generally conducted by unit supervisors and the deputy director.

Commendations: The Agency has developed an effective policy requiring that case record reviews be conducted on a monthly basis throughout the various units for the purposes of quality assurance and administrative compliance. Moreover, case record reviews are conducted on a weekly basis within the Intake and Ongoing Units. This in-house policy far exceeds the ODJFS requirements regarding SARs, pursuant to OAC §5101:2-42-43, for children in placement and annual reviews for the remaining open cases.

Recommendations: The Agency should consider developing evaluative questionnaires to distribute to clients and family members at different points of service delivery. CPS could use the citizen/client questionnaire as a format to develop other questionnaires for clients and relatives who are at different stages of service, including: intake, ongoing, temporary foster care and permanent custody. CPS should develop a comprehensive surveying program in order to assess customer satisfaction regarding its programs, operations, and service delivery. The Agency could use the citizen/client questionnaire as a model for developing survey questions for a variety of groups who receive services from CPS. Initially, management could explore the possibility of establishing a contract with a local college in order to conduct surveys and compile statistically significant data for the Agency.

Other recommendations include:

- The Agency should consider conducting focus groups, representing a cross cultural section of the community. CPS should review non-employee complaints/grievances and conduct client interviews in order to assess levels of customer satisfaction.
- CPS should consider establishing a quality assurance committee which would oversee a variety of Agency improvement efforts.

Objectives and Scope

A performance audit is defined as a systematic and objective assessment of the performance of an organization, program, function or activity to develop findings, commendations and recommendations. Performance audits are usually classified as either economy and efficiency audits or program audits.

Economy and efficiency audits consider whether an entity is using its resources efficiently and effectively. They attempt to determine if management is maximizing output for a given amount of input. If the entity is efficient, it is assumed that it will accomplish its goals with a minimum of resources and with the fewest negative consequences.

Program audits normally are designed to determine if the entity's activities or programs are effective, if they are reaching their goals and if the goals are proper, suitable or relevant. Program audits often focus on the relationship of the program goals with the actual program outputs or outcomes. Program audits attempt to determine if the actual outputs match, exceed or fall short of the intended outputs. The performance audit conducted on CPS's policies and procedures contains elements of both an economy and efficiency audit and program performance audit.

The objectives of performance audits may vary. The Auditor of State's Office has designed this performance audit with the objective of reviewing systems, organizational structures and operating procedures to assess the efficiency and effectiveness of CPS. Specific objectives of this performance audit include the following:

- Evaluate the adequacy of the Agency's mission statement, planning function, and long-term goals
- Assess the adequacy of the policies and procedures manual
- Assess the Agency's methodology for monitoring the implementation of policies and procedures
- Review the policies and procedures governing the grievance process available to clients and other external parties
- Review the policies and procedures governing the verification of the licensing of foster care providers
- Examine the appropriateness of current technology and potential uses of technology to enhance Agency operations
- Evaluate the effectiveness of Agency interaction and communication with the community
- Examine the effectiveness of customer service and quality assurance initiatives

The performance audit of CPS covers the following areas of operations:

- Mission statement, planning functions and long term goals
- Policies and procedures manual

- Methodologies for monitoring the implementation of policies and procedures
- Confidentiality and the grievance process
- Verification of foster care provider licensing
- Appropriateness and potential uses of technology
- Agency interaction and communication with community
- Customer satisfaction and quality assurance initiatives

Planning for the performance audit began in February 2000. The actual performance audit was conducted primarily during the months of March 2000 through mid-June 2000. Regular progress meetings were conducted throughout the entire period. Draft reports were discussed with the staff and management of Clermont County and CPS.

Methodology

To complete the performance audit, the auditors gathered and assessed a significant amount of data pertaining to CPS, conducted interviews with various individuals associated with CPS and assessed information from industry benchmark and best practices reports. The methodology is further explained below.

Use of previous studies, reports and other data sources

In evaluating the various performance audit areas, CPS was asked to provide any previous studies or analyses already prepared on the subject areas. In addition to reviewing this information, the auditors spent a significant amount of time gathering and reviewing other pertinent documents or information. Examples of the studies, reports and other data sources which were reviewed include the following:

- Agency reports and planning documents
- Manuals from ODJFS, Adopt Ohio, Clermont County
- Lorain County Children's Services planning documents, reports and manuals
- Marion County Children's Services planning documents, reports and manuals
- Logan County Children's Services planning documents, reports and manuals
- Public Children's Services Association of Ohio (PCSAO) *Standards for Effective Practice and Fact Book*
- American Humane Association's review of Cuyahoga County Department of Children and Family Services
- Auditor of State's Office (AOS) Performance Audits on Montgomery County Children Services Agency and Butler County Children Services Board

Interviews and Discussions

Numerous interviews and discussions were held at many levels and with groups of individuals involved internally with CPS. These interviews were invaluable in developing the overall understanding of operations and in some cases, were useful sources in identifying concerns with CPS policies and procedures and in providing recommendations to address these concerns. Examples of the organizations and individuals which were interviewed and surveyed include the following:

- Clermont County CPS management and staff
- Clermont County DJFS Information Services employees
- Logan County Children's Services management
- Marion County Children's Services management
- Lorain County Children's Services management
- Director, Public Children's Services Association of Ohio

Benchmark Comparisons with Other Agencies

Benchmark comparisons were developed through best practice agencies, CPOE indicators, and PCSAO *Standards for Effective Practice*. Performance indicators were established for the various performance audit areas to develop a mechanism to compare how CPS is managing policies and procedures within the Agency. The information was gathered through interviews, data reports and industry publications.

Comparative Statistics

Comparative statistics and information regarding CPS policies and procedures are presented in **Table 1-1 (A)** through **1-1 (C)** which show comparisons between best practice agencies and Clermont County CPS. Best practice agencies are agencies in Ohio and other states that are recognized by national organizations for demonstrating high levels of operational efficiency and effectiveness in their respective fields. National organizations that recognize best practice agencies include:

- Council on Accreditation
- American Humane Association
- Child Welfare League of America
- Children's Defense Fund
- United Way of America
- Annie E. Casey Foundation
- National Child Welfare Resource Center for Organizational Improvement
- National Clearinghouse on Child Abuse and Neglect Information
- Center for the Study of Social Policy
- National Association of Counties

Table 1-1 (A) shows comparisons between CPS and best practice agencies regarding mission statements, short and long-term goals, strategic planning and performance measures. As shown in the table, all of the agencies use mission statements and short-term goals. However, Clermont County CPS is the only PCSA lacking an Agency-specific strategic plan to serve as a guide for the long-term development and enhancement of Agency functions. Because CPS has not developed a customized strategic plan to provide the means to achieve long-term objectives, long-term goals have not been implemented within CPS. However, as shown in the table, none of the agencies have developed and implemented performance measures.

Table 1-1 (A): CPS Planning and Performance Measurement Indicators

	Clermont	Lorain	Marion	Recommended Practices
Mission Statement	Yes	Yes	Yes	Yes
Long Term Goals	No	Yes	Yes	Yes
Short Term Goals	Yes	Yes	Yes	Yes
Agency Specific Strategic Plan	No	Yes	Yes	Yes

Source: Clermont CPS and Best Practice Agencies

Table 1-1 (B) illustrates comparisons between CPS and best practice agencies with regard to a policies and procedures manual, review committee, internal confidentiality and grievance procedure, and a grievance database. As shown in the table, CPS and the best practice agencies maintain policies and procedures manuals to help guide caseworkers in service delivery. CPS, however, lacks an established committee to periodically review policies and procedures, as well as a comprehensive written internal confidentiality policy. Although none of the best practices maintain a grievance database, it is recommended that children’s services agencies track complaints and grievances.

Table 1-1 (B): CPS Policies and Procedures Indicators

	Clermont	Lorain	Marion	Recommended Practices
Policies and Procedures Manual	Yes	Yes	Yes	Yes
Policies and Procedures Review Committee	No	Yes	N/A	Yes
Comprehensive Written Internal Confidentiality Policy	No	Yes	N/A	Yes
Grievance Procedure for Non-employees	Yes	Yes	Yes	Yes
Grievance Database	No	No	No	Yes

Source: CPS and Best Practice Agencies

Table 1-1 (C) compares CPS with best practice agencies with regards to technology and quality assurance indicators. The table illustrates that CPS, relative to the best practice agencies, does not receive foster home licenses from contracted service providers prior to a child's placement. In addition, the table shows that the Agency lacks a strategic technology plan to assist in identifying its technological needs and establish achievable objectives with regards to technology. CPS does not offer consumer information brochures, nor does it have a customized Web site to offer information about its various services and programs to external parties. Although the Agency conducts case record and peer reviews, CPS has not established a comprehensive surveying program or a committee to oversee and monitor various efforts deigned to improve the quality of Agency services.

Table 1-1 (C): CPS Technology and Quality Assurance Indicators

	Clermont	Lorain	Marion	Recommended Practices
Network Foster Home Licenses Received Prior to Placement	No	Yes	Yes	Yes
Strategic Technology Plan	No	Yes	N/A	Yes
Agency Web Site	No	Yes	Yes	Yes
Consumer Information Brochures	No	Yes	Yes	Yes
Comprehensive Surveying Program	No	Yes	No	Yes
Case Record and Peer Review	Yes	Yes	Yes	Yes
Quality Assurance Committee	No	Yes	Yes	Yes

Source: CPS and Best Practice Agencies

Background

Organizational Function

Ohio's public social services program is supervised by the State and administered by the counties' Public Children's Services Agencies (PCSA), created under Chapter 5153 of the Ohio Revised Code (ORC). These agencies may include either county children's services boards or agencies within county departments of jobs and family services that have children's services functions. ORC §5153.16 and §5101.46 require that the county PCSA look after the interests of children in need of public care or protection by:

- Investigating reports concerning children in need of care, protection, or service
- Providing services to children in their own homes, in the home of a relative, a family foster home, a receiving home, school, or institution
- Providing emergency and substitute care for children who are removed from their homes
- Locating family foster homes and adoptive homes
- Offering adoption services, which include subsidized adoption

In Clermont County the PCSA exists as an Agency within the County Department of Job and Family Services, Children's Protective Services (CPS or the Agency). Not only must CPS adhere to the specified rules mandated by the ORC, but the Agency's operations are subject to various guidelines and procedures contained in the Ohio Administrative Code (OAC) and regulations established by the Ohio Department of Job and Family Services (ODJFS). The following lists the Agency's key mandated child protection responsibilities pursuant to state guidelines found in ORC, OAC, and ODJFS manuals:

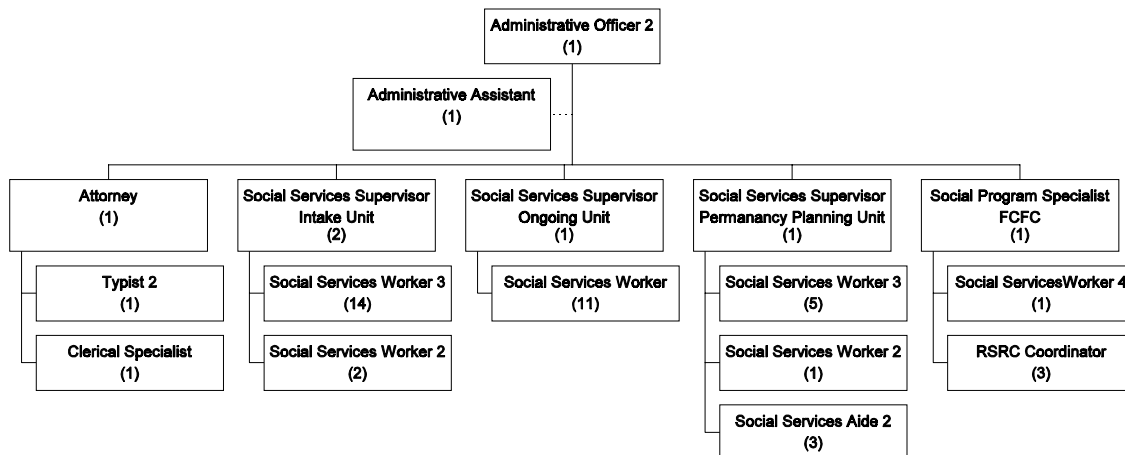
- Investigate all reports of child abuse or neglect
- Provide 24-hour staffing to respond to situations where a child has been reported to be at imminent risk
- Implement a system of risk assessment for determining the risk of abuse or neglect to a child
- Accept custody of and provide substitute care for abused, neglected and dependent children, including handicapped children, who cannot safely remain with parents or custodians
- Provide foster care, within or outside the County, for the care of children, including handicapped children from other counties attending special schools in the county
- Collaborate with other county, State and out-of-state organizations in matters relating to the welfare of client children
- Administer Title IV-E funds and adoption assistance payments
- Provide timely permanent homes, primarily through adoption, for those children who can never be reunited with parents or custodians

- Provide supplemental contracted counseling and diagnostic services through private providers, as allowed under ORC §5153.16.

Organizational Chart

CPS is one of five divisions within the County Department of Job and Family Services. The Agency consists of 50 full-time equivalents (FTEs). The chart below provides an overview of CPS’s organizational structure and staffing levels. All positions are shown in FTEs.

**Chart 2-1: Clermont County Department of Job and Family Services
Children’s Protective Services**



Summary of Operations

The core services provided by CPS are administered through the following functions:

- Screening
- Intake investigations
- Ongoing services
- Visitations
- Counseling and diagnostic service
- Substitute care (foster care)
- Adoption services

Screeners, under the Intake Administrative Unit, receive and process all referral calls to CPS alleging child abuse, neglect or dependency before transferring them to the appropriate intake unit. Upon receipt of the referral call, the Agency is responsible for determining if information provided by the reporter constitutes a report of alleged child abuse and neglect and begins to ascertain the urgency of risk to the child. Requirements for screening child abuse and neglect reports are detailed in OAC §5101:2-34-06. Parties involved in the investigation of child abuse and neglect shall be assured that information provided to CPS is kept confidential, unless it is in the best interests of the child to disclose information. OAC §5101:2-34-38 contains procedures for disclosing child abuse and neglect information maintained by the Agency. In 1999, CPS received 2,488 referrals of child abuse or neglect and investigated 1,597 cases. An additional 229 cases were deemed Dependency or Information and Referral cases and were referred to another agency for the appropriate services. A total of 4,680 children received some form of service from the Agency.

Intake workers receive referrals from supervisors and are responsible for performing investigations of reported information. At this point, a determination is made of the origin, type and extent of risk to the child. OAC §5101:2-34-32 to §5101:2-34-36 contain requirements for assessments and investigations. Intake workers are also responsible for establishing contact with case principles within State mandated time guidelines to complete risk assessments regarding the safety of alleged child victims. Time frames for implementing the Family Risk Assessment Model and procedures for developing this plan are also found in the OAC §5101:2-34-331 and §5101:2-34-37. The majority of investigations involve allegations of child abuse or neglect. In 1999, CPS performed 1,597 investigations of child abuse and neglect involving 3,774 children. An additional 229 cases were deemed Dependency or Information and Referral cases and were referred to another agency for the appropriate services. A total of 249 investigated reports were substantiated as instances of child abuse or neglect, while 268 were indicated as abuse or neglect but lacked confirmation. On the other hand, 1,080 investigated reports were found to be unsubstantiated cases of child abuse or neglect.

Following the investigation phase, intake workers assist ongoing workers in completing case plans. The Ongoing Administrative Unit is responsible for monitoring client progress, case plan goals and

Semi-annual Administrative Reviews (SAR) for cases requiring in-home services and/or out-of-home placements. Procedural requirements for case plans are found in OAC §5101:2-39-08, §5101:2-39-081, §5101:2-39-10 and §5101:2-39-11. Requirements for SARs are found in OAC §5101:2-42-43. In 1999, the Ongoing Unit worked on 245 cases serving approximately 530 children. The Ongoing Unit averages 13 to 15 cases per staff member.

The social services aides, under the Planned Permanency Unit, provide transportation service to children for medical treatment, counseling and family visits. Additionally, the social services aides provide supervision for family visits. In 1999, CPS social services aides performed 3,414 transportation services and supervised 140 family visits.

CPS also contracts for services to assist in providing emergency and ongoing services. Depending on the assessment of individual cases by intake and ongoing workers, clients may be referred to contracted providers to receive in-home services, diagnostic and psychiatric assessments, and/or therapy. Pursuant to OAC §5101:2-39-50, CPS may cooperate with other organizations to coordinate the best service delivery to children and families.

At any point during the investigation phase or the administration of ongoing services related to an open case, the Agency has the authority to file for custody and remove the child from the home if the child is determined to be at sufficient risk. Removal of children from their own homes or an out-of-home care setting is only considered if the child's safety cannot be assured through the provision of supportive services. OAC §5101:2-39-12 contains procedures for removing a child from his home, while OAC §5101:2-39-121 contains procedures for removing a child from an out-of-home care setting. Placement of children outside their own homes is only considered after all other efforts fail to ensure the child's protection. Placements are selected based upon the needs of the child with the goal of reuniting the family as soon as possible or providing an alternative permanent placement for the child, which can include adoptive placements. OAC §5101:2-42-04 to §5101:2-42-09 and §5101:2-42-94 contain procedures for accepting and terminating temporary and permanent custody of children. Overall, approximately 211 children were in CPS's custody at the end of 1999. As found in ORC §5153.01 and §5153.16, the three possible legal designations associated with substitute care and Agency custody include the following:

- **Temporary Foster Care:** General permanency plan for reunification
- **Planned Permanent Living Arrangements:** No plan for reunification or adoption, permanent foster care
- **Permanent Custody:** General permanency plan is for adoption

Of the 211 children in CPS's custody, 174 received temporary foster care which includes those in Planned Permanent Living Arrangements through the Agency, while another 37 were in permanent custody. Placements included Agency foster homes, relative's homes, detention centers, network foster care providers, group homes and residential treatment centers.

The Clermont County Prosecutor's Office works as the Agency's counsel in cases heard before the Clermont County Juvenile Court. The Prosecutor's Office also provides CPS with legal opinions on cases and files all cases on behalf of the Agency, including custody and non-custody case filings. The Prosecutor's Office also handles all case appeals associated with CPS. This service is performed at no cost to the Agency.

Adoption services are offered by public and private children's services agencies to secure and maintain permanent homes for children legally free for adoption. The comprehensive scope of these services extends to birth parents, adoptive parents, and the adoptive child. OAC §5101:2-48-05 sets forth procedures for CPS to follow when developing an agency adoption policy. Under the Adopt Ohio Plan, CPS's Adoption Unit collaborates with other agencies, both public and private, in efforts to find permanent homes for children under the Agency's custody whose permanency plans do not involve reunification or permanent planned living arrangements. The mission of Adopt Ohio is to have all agencies working towards the common goal of having no available children in the custody of public children's services agencies. OAC §5101:2-48-01 and §5101:2-48-04 sets forth the responsibilities of CPS with regard to the Adopt Ohio Plan. In 1998, the Agency finalized 19 adoptions out of 45 children who were in permanent custody. In 1999, 37 children were in permanent custody, and the Agency finalized 10 adoptions.

Summary of Policies and Procedures

Clermont County Children's Protective Services is directed and managed according to formally established written policies and procedures that are mandated by the ORC, OAC, and ODJFS. The Agency also uses in-house policies and procedures. These policies and procedures are accessible to all Agency staff. The Agency's mission statement serves as a basis for its policies and procedures and helps the staff in delivering effective service based on the specific needs of the community.

CPS is directed and managed according to formally established written policies and procedures contained in various documents which govern the Agency. As legislation is signed into law, it becomes codified as statutes and entered into the ORC. The ORC establishes the existence of the Agency and sets forth general policies, guidelines, and procedures for CPS to follow. The majority of applicable statutes for CPS are provided in Chapter 5153 of the ORC.

The Agency is also governed by the OAC which contains rules that amplify the statutes provided by the ORC. CPS uses an OAC manual, issued by the ODJFS, consisting of specific policies and procedures regulating all aspects of Public Children's Service Agencies. The majority of rules which govern the Agency's daily operations are contained in Chapter 5101 of the OAC.

CPS also follows certain in-house policies and procedures which supplement existing guidelines provided by the ORC and OAC. The Agency renders its own more stringent standards and guidelines in certain program areas based on the specific needs of the community. These in-house policies and

procedures are regularly revised based on changes in legislation or mandates passed down by the ODJFS.

The Public Children Services Association of Ohio (PCSAO) is a coalition of PCSAs whose mission is to promote child safety, family stability, and community strength through the development of sound public policy, program excellence, training, and technical assistance. Various recommendations and strategies from PCSAO will be used throughout this section. Additional recommendations are drawn from the American Humane Association's review of the Cuyahoga County Department of Children and Family Services, and the Auditor of State performance audits on the Montgomery County Children Services Agency and the Butler County Children Services Board.

Policies and Procedures

Performance Measures

The following is a list of performance measures that were used to conduct a review of Clermont County Children's Protective Services's policies and procedures:

- Evaluate the adequacy of the Agency's mission statement, planning function, and long-term goals
- Assess the adequacy of the policies and procedures manual
- Assess the Agency's methodology for monitoring the implementation of policies and procedures
- Review the policies and procedures governing the grievance process available to clients and other external parties
- Review the policies and procedures governing license verification for foster care providers
- Examine the appropriateness of current technology and potential uses of technology to enhance Agency operations
- Evaluate the effectiveness of Agency interaction and communication with the community
- Examine the effectiveness of customer service and quality assurance initiatives

Findings / Commendations / Recommendations

Mission Statement, Planning Function and Long-Term Goals

F3.1 CPS's mission is conveyed in a two sentence statement that explains the Agency's general purpose of providing a comprehensive system of assessing risk of abused, neglected and dependent children. The mission statement is as follows:

“It is the mission of Clermont County Children's Protective Services to provide a comprehensive system of assessing risk of alleged abused, neglected, and dependent children and their families. Preventative efforts and supportive services are provided in order to promote family stability and self-sufficiency.”

The values which help guide the Agency's staff members are identified as promoting self-sufficiency and encouraging family stability. As stated in the mission, the Agency's main activities are providing risk assessments, prevention efforts, and supportive services.

The mission statement is displayed in the lobby of CPS and also conveyed in the Agency's annual report. Externally, the mission is reiterated by the County Commissioners who use the mission in the annual report and in the state of the County address. CPS supervisors and participating staff disseminate the mission statement during speaking engagements to schools and various civic groups. CPS also promotes its mission before upcoming levies and during National Child Abuse and Neglect Prevention Month.

F3.2 According to the California Management Assistance Partnership, an organization's mission statement provides an agency with an ultimate purpose and a reason for existence. Generally speaking, a mission statement is a form of inspiration, explaining the principles which guide the organization's staff in delivering services. The mission statement typically describes an organization in these terms:

- **Purpose:** Why the organization exists and what it seeks to accomplish
- **Business:** The main method or activity through which the organization works to fulfill this purpose
- **Values:** The principles or beliefs which guide an agency's staff members as they pursue the agency's purpose

According to the PCSAO publication, *Standards for Effective Practice*, PCSAs should develop, distribute and appropriately display the mission and value statements both internally and externally.

C3.1 CPS routinely communicates its mission and accompanying values to the community and within the Agency itself. By publicizing the mission statement, the Agency is better able to garner support from the community and key stakeholders who have a vested interest in children's protective services. Furthermore, CPS is more likely to develop partnerships with other agencies and coalitions who have a shared interest in protecting children.

F3.3 The Agency's mission statement undergoes periodic updates and revisions to reflect major changes in child welfare policy. Recently, the mission was amended to reflect the goal of self-sufficiency inherent in welfare reform legislation. The mission statement was also revised to include risk assessment, reflecting a change in policy mandated by ODJFS. In the past, CPS held retreats where the mission statement would be reevaluated by Agency supervisors and staff members. Currently, the revision process at CPS is an in-house operation, occurring during meetings amongst supervisors who ask for input from staff members.

C3.2 The Agency was responsive in revising its mission statement to reflect the changing nature of child welfare. The Agency's mission statement illustrates the major tenets of personal responsibility and self-sufficiency inherent in recent welfare reform legislation. By tailoring the mission statement to reflect these values, CPS orients its vision with current national philosophies.

F3.4 In its present form, the mission of CPS is represented by a process or means-based statement. Since mission statements explain an organization's reason for existence, CPS exists to assess risk while providing supportive and preventative services to promote self-sufficiency and family stability. The Agency uses a process-oriented mission that focuses on the activities it needs to accomplish, rather than the outcome of protection that it helps to ensure.

Marion County Children's Services (MCCS or Marion) uses an outcome-based mission statement that focuses on the safety of children. The mission statement is as follows:

“Marion County Children's Services will lead the community in the prevention, identification, and protection of abused and neglected children. This is done by coordinating intervention and supportive services in partnership with their families and other community resources to assure children are safe and have stable and permanent homes.”

Marion's activities are stated as coordinating intervention and supportive services. The values that help guide staff members are identified as prevention, identification, and protection of abused and neglected children. However, the purpose is clearly stated in that MCCS exists to assure children are safe.

R3.1 CPS should consider revising the current mission statement to reflect a more outcome-based approach. An agency's mission statement should be outcome-based; it should convey the ultimate reason for an agency's existence. Assessing risk while providing supportive and preventative services are the processes by which CPS can accomplish its mission, but should not be the mission itself. Although the outcomes of family stability and self-sufficiency are stated, the mission statement should be revised to include the Agency's ultimate purpose - providing for the safety and protection of children. By revising the mission statement, CPS can clarify their mission and reason for existence within the County and community.

F3.5 In 1993, management and staff members from CPS participated in a strategic planning process that was initiated by the Clermont County Commissioners (Commissioners) and the Clermont County Juvenile Court Judge. Participating County agencies included the Department of Job and Family Services (DJFS), which includes CPS; the Juvenile Court; and the Board of County Commissioners. Approximately 120 key stakeholders were involved in developing a shared vision and strategic plan for all children's services agencies in the County. The resulting strategic plan was called "In the Interest of Children". An overall mission was developed among the children's services agencies and elected officials. The planning process identified both short-term and long-term strategic initiatives extending to the year 2000. Some initiatives were department specific but most were cross-functional, identifying key staff members responsible for implementing the initiatives in different departments and agencies. Examples of the key strategic initiatives and their results include:

- **Initiative:** Reduce caseload size based upon the needs of children and their families
Key staff: Professional staff and administrators from DJFS and Juvenile Court
Result: Within CPS, caseloads were reduced from an average of 25 to 13 cases per worker.
- **Initiative:** Triple the number of foster homes available in the County network
Key staff: Professional staff and administrators from DJFS and Juvenile Court
Result: The amount of available foster homes doubled in the County network.
- **Initiative:** Develop programs and procedures that will reduce the need for out-of-home placements, and the length of placements by 10 percent
Key staff: Professional Staff and administrators from DJFS and Juvenile Court
Result: Wraparound services were intensified at CPS, like arranging utility payments for families. Programs such as the Home Visits Program were initiated to prevent removal of children from environments of lesser risk.

Although many of the plan's strategic initiatives were implemented and continue in Agency practice, as a strategic plan "In the Interests of Children" has become outdated (see **R3.5**).

C3.3 The strategic plan, "In the Interests of Children," was effective in encouraging cross-functional relations between children's services agencies in Clermont County. It became obvious that continued collaboration between children's services agencies would be necessary to succeed in protecting abused and neglected children. Involving key stakeholders from various agencies and the community in the planning process was also an effective strategy for creating a sense of ownership in the plan. This open dialogue between agencies and with community members increased accountability and improved the Agency's ability to provide appropriate and effective services.

F3.6 In 1995, the Board of County Commissioners and senior staff undertook a visioning process which produced a plan entitled "Clermont On The Rise". The resulting strategic plan was to be implemented by every department under the County Commissioners, not just agencies involved in children's services. Again, a variety of key stakeholders participated in the strategic planning process which resulted in a shared mission with core values and related goals. Action plans, called Unit Plans of Work (UPWs), were established in order to achieve county-wide goals. Every County department formulated customized UPWs consistent with the goals established in "Clermont On The Rise". The county-wide goals included:

- **Community Building:** Concentrate efforts and resources on building communities rather than simply delivering services
- **Teamwork:** Build individual and team-oriented working conditions that sustain innovative and effective responses which address the true needs of the community
- **Governance:** Establish a sustainable community-owned, citizen-driven system of governance that catalyzes and facilitates change
- **Service:** Continually assess, effectively organize and wisely apply natural, economic and human resources to meet responsibilities to the people of the community

These county-wide goals are applicable to CPS, and they provide standards for successful service delivery. However, "Clermont On The Rise" contains no components addressing goals specific to children's services. Rather, "Clermont On The Rise" established UPWs which provided all County Departments with a standard method and format for developing and implementing customized goals.

F3.7 Currently, CPS uses UPWs as their primary goal-setting vehicle. UPWs are established annually and reviewed periodically by management staff. UPWs are customized by CPS, and they include participating agencies who assist in achieving the Agency's goal. A typical UPW establishes a time frame, necessary resources, supporting values, activities involved, stakeholder benefits, and participating agencies. However, there are no action steps assigned to the participating agencies and staff members. An example of a UPW is shown in **Table 3-1**.

Table 3-1: Sample UPW

Goal	Establish a method to decrease the time children remain in substitute care	
Action	Time Frame	
Develop an intense system of monitoring case plan compliance	01/01/00 through 03/31/00	
Swift movement toward permanency by transforming and applying inputs and outputs to the system	01/01/00 through 12/31/00	
Implement and/or revise method based upon outcome measurement reports	03/31/00 through 12/31/00	
Supporting Values		
Provide supporting values, which include: respect, integrity, service, and excellence		
Provide the invested resources which include staff time, and a 10 percent reduction of placement costs		
Participating Agencies and Staff Members		
CPS staff members, Juvenile Court, various service providers and ODJFS		

R3.2 Although CPS effectively associates its UPWs with County-wide goals, it should consider establishing its own system of goal-setting which would be a part of a comprehensive, long-term strategic plan. The Agency's goals should be an integral part of an action plan, designed to implement identified strategic initiatives (see **R3.5**). In addition, CPS should include action steps whereby specific individuals would be responsible for an action step's completion. By designating specific individuals into the action plan, CPS increases accountability for success or failure of the UPW. The UPWs could become short-term action plans in a comprehensive long-term strategic plan.

F3.8 Periodically, the deputy director and unit supervisors evaluate the UPWs. They assess progress and make any mid-term adjustments that are necessary in order to achieve the desired goal. The Agency publicizes accomplished UPWs in annual reports, Agency fact sheets, and during speaking engagements. According to the Agency's FY 1998 annual report, CPS obtained over \$280,000 in annual child support orders on behalf of children in custody, a 40 percent increase over that of FY 1997.

For measurement purposes, the Agency primarily uses Child Protection Oversight and Evaluation (CPOE) indicators as benchmarks. CPOE is a state monitored quality assurance program that incorporates continuous quality improvement and outcome measures for county PCSAs. The CPOE program compiles data from the Families and Children's Service Information System (FACSIS) to establish indicators for measurement. Examples of CPOE outcome indicators include the following:

- Cumulative percentage of children with a report of abuse or neglect during the reporting period who were removed from the home within six months of the report
- Length of time between the date of permanent custody and the date of adoption finalization
- Number of days a child remains in out-of-home placement
- Number of moves a child experiences during one out-of-home placement episode

Although the CPOE program enables CPS to measure its operational performance, the program is limited because FACSIS cannot process the data for the outcome indicators in a timely fashion. Children's services agencies are challenged to reconstruct the factors which contributed to operational performance for a particular time in the past. Because the CPOE information is not current, it becomes difficult for children's services agencies to make operational changes or take any corrective action to improve performance (see **R3.3**).

F3.9 Performance measures are defined as a system of customer-focused quantified indicators that let an organization know if it is meeting its goals and objectives. Performance measures are a management tool that assist supervisory staff in evaluating work performed and results achieved. These same measures form a basis for management to plan, budget, and structure the program, and control results. Measurement for performance helps to ensure a continuous provision of efficient and effective services being provided.

CPS uses several informal benchmarks to gauge the efficiency and effectiveness of Agency programs. The implementation of activity based costing and use of CPOE indicators provides the Agency with a foundation for the development of outcome measurement reporting. While CPS informally employs performance measures and benchmarks there is no evidence of a formal performance measurement and reporting system for the Agency's functions.

R3.3 Under the supervision of the Agency's deputy director, CPS should develop a formal methodology of internal and external performance. It is important that the performance measures be aligned with the Agency's objectives to effectively evaluate and communicate performance. The Agency should be vigilant in developing, updating and reporting performance measures. The implementation of a performance measurement and reporting system is an evolutionary experience in which measures will likely improve with experience. Initially, the Agency should include common indicators. The types of performance measures most commonly used in government include:

- **Inputs:** Resources used (what is needed)
- **Outputs:** Activities completed (what is produced)
- **Outcomes:** Results achieved
- **Efficiency:** How well resources are used
- **Quality:** Effectiveness (how much has the Agency improved)

Each measure is designed to answer a different question. It is not always necessary to use all of the types of measures to determine if an objective is being achieved. Good performance measures need to be specifically defined and identified. Clear explanations are necessary to indicate what is being measured, the source of the information, and how the value is calculated. The use and reporting of performance measures may increase Agency efficiency and should better inform key stakeholders of Agency performance. Examples of issues that should be communicated through performance measurement reporting include:

- Percentage of staff time devoted to case type (Input)
- Response times to child abuse and neglect complaints (Efficiency)
- Number of child abuse and neglect complaints investigated per intake caseworker (Efficiency)
- Foster care recruitment and retention rates (Output)
- Number of training sessions held in given time frame (Output)
- Number of finalized adoptions in a given time frame (Output)
- Percentage increase in response times to child abuse and neglect complaints (Quality)
- Percentage increase in unrelated foster care placements in same home (Quality)
- Increase in number of available county-administered foster homes (Outcome)
- Increase in number of wraparound services available to clients (Outcome)

F3.10 CPS does not have a formalized quality improvement system designed to measure Agency performance with regards to outcomes. Although management staff measures Agency performance using case record reviews, activity based costing and CPOE indicators, CPS has not developed a formal process for identifying measurable outcomes on an ongoing basis, reporting outcomes to County management and the community, and incorporating the results into the Agency's decision making processes. In measuring and reporting progress towards identifiable outcomes, children's services agencies become more accountable in providing for the safety and permanence of abused and neglected children.

R3.4 Since the "Managing for Results" program encourages the Agency to focus on outcomes rather than activities, CPS should design a quality improvement system to develop, assess and report outcome measures (see **F3.11**). In 1998, Cuyahoga County Department of Children and Family Services (Cuyahoga County DCFS) underwent a comprehensive performance audit that recommended several steps used in developing outcome measures. CPS should examine the steps recommended to Cuyahoga County DCFS and should consider following the recommended steps which are outlined below.

- Identify key stakeholders to be included in building a consensus on three to five target outcomes which are consistent with the Agency's mission
- Develop a set of measurable indicators for each target outcome by which progress may be assessed

- Structure the Agency's information system to be enabled to collect data on outcome indicators
- Incorporate a focus on outcomes into all levels of the Agency by modifying daily operations to include a process of reporting progress towards identified outcomes

Once the target outcomes are established by key stakeholders, the quality assurance committee should be responsible for reporting the progress towards the identified outcomes to management staff and key stakeholders (see **R3.27**). With periodic progress reports on outcome achievement, CPS management is better able to make decisions regarding Agency performance as well as individual performance. By involving key stakeholders in the process, CPS is more accountable in providing for the safety and permanence of abused and neglected children within the community.

F3.11 In 1998, the Commissioners asked departmental supervisors throughout the County to participate in a leadership program designed to improve government. The program, "Managing for Results," encourages management staff to shift an organization's focus from inputs to outcomes. The philosophy behind this program logically follows other important studies on improving government, including *Reinventing Government*, (1992) and *Banishing Bureaucracy*, (1997). CPS management staff participated in the program at first on a monthly basis and, most recently, on a quarterly basis. The program includes a series of workshops, lectures, and videos that address a variety of results-oriented approaches to management. Some of the major initiatives suggested by the "Managing for Results" program include:

- Focus on moving from inputs to outcomes
- Identify and involve key stakeholders
- Use strategic planning and visioning to adopt goals as a community
- Use performance measures and benchmarks to monitor progress
- Utilize surveys to obtain input from the community and clients
- Communicate performance results to all stakeholders to improve accountability
- Shift organizational control away from the top and center to help flatten the organizational chart
- Establish collaborative partnerships for shared outcomes

CPS has instituted several aspects of Managing for Results. A citizen/client questionnaire has been developed and the Agency plans to disseminate it in the near future. Also, surveys for Agency foster homes have been conducted, but a comprehensive surveying process has thus far not been developed. CPS has established and maintained collaborative partnerships with various groups from the public and private sectors. However, key stakeholders have not been identified for the purposes of developing a strategic plan designed for CPS (see **R3.5**).

F3.12 CPS does not have a current formal strategic plan to serve as a guide for the long-term development and enhancement of Agency functions. PCSAO indicated that such long-range planning is relatively common among children's services agencies, estimating that approximately 35 county agencies have developed strategic plans or 40 percent of Ohio Counties. The coalition specifically cited Lorain County Children's Services (LCCS or Lorain) as having successfully developed and implemented a model strategic plan.

Lorain began its strategic planning process by assembling LCCS Board members, staff, and approximately 70 representatives from other organizations who have a shared interest in children's services. Led by a planning coordinator, these key stakeholders answered a series of questions concerning children, families, and the responsibility of LCCS within the community. A shared vision was developed which included LCCS's mission statement. The mission statement describes Lorain's unique contribution to the attainment of the shared vision.

A guiding group, consisting of 35 staff and community members, convened to develop a draft plan detailing LCCS's role in attaining the shared vision. The guiding group returned the draft plan to the original assembly for comments and suggestions. With full consideration given to the input and feedback, the plan was developed and adopted by the LCCS Board.

The plan is divided into six general areas, including:

- Operations
- Staff Recruitment, Orientation, Training, and Retention
- Continuous Quality Improvement and the Uniform Delivery of Effective Services
- Child Protection Continuum of Services
- Financing, Facilities, and Management Information Systems
- Community Education to Increase Support for Activities Related to the Protection of Children

Each area is assigned a coordinator to manage and track outcomes and serve on the plan's implementation team. Responsibility for achieving each outcome is assigned to a specific individual, who develops related action plans with measurable action steps, time lines and resource requirements. Written reports on the progress of implementing the plan are prepared quarterly. LCCS links its long-term financial forecasts and annual budgets to the strategic plan.

R3.5 CPS should place a high priority on formulating a long-term strategic plan that includes objectives, definitions of desired outcomes, and realistic time lines for implementation. Participation in the “Managing for Results” program creates an opportunity for the CPS management staff to develop its own strategic plan. Lessons from this program can help guide the Agency in its strategic planning process with support from the Commissioners.

The purposes of the strategic planning process are to:

- Establish the overall mission, vision, goals, objectives and strategies of the organization
- Provide an ongoing framework for action upon which decisions can be made about what is being performed
- Create an understanding regarding the intent of the program and how its actions are moving the program toward the desired outcomes
- Provide a basis for the allocation of tasks, which includes the roles and responsibilities of each party
- Assess the programs' current and past successes in order to inform the necessary parties
- Identify resources required to achieve the desired outcomes
- Improve performance through monitoring and eliminating activities that are not contributing to the desired outcomes
- Increase accountability for stakeholders and management

The strategic plan should:

- Establish the overall mission, vision, goals, objectives and strategies of CPS, and develop means to meet the goals and objectives (action plan)
- Establish mechanisms for coordinating and monitoring projects among different departments
- Address issues that are common to all projects
- Prioritize projects
- Require realistic time frames with an implementation plan
- Describe interagency coordination and project leadership as well as project accountability

It is important to note that the key to a successful strategic planning process lies not only in the final document, but with the strategically aligned interaction and communication among the parties involved. A successful strategic plan should also encompass several years of planning and be updated at least annually to reflect accomplishments and changes in priorities. In creating its own plan, CPS is encouraged to approach organizations such as the PCSAO, the Council on Accreditation (COA) and the National Child Welfare Resource Center for Organizational Improvement for guidance and expertise. CPS may also wish to contact LCCS

to take advantage of its experience in strategic planning methodology and document development.

Policies and Procedures Manual

F3.13 CPS's activities are directed and managed according to formally established written policies and procedures contained in three different ring-bound manuals. The Agency's various manuals are summarized in **Table 3-2**.

Table 3-2: CPS Policies and Procedures Manuals

Manual	Issuing Authority	Procedures Included
Family, Children and Adult Services	ODJFS	Geared toward all public social services agencies and private child placing agencies. Includes ORC and OAC procedures to follow when administering programs and providing services to families, children, and adults.
Permanency Planning Manual	Clermont County Children's Protective Services	Manual is program specific and geared toward functions performed by the Permanency Planning Unit.
CPS Polices and Procedures Manual	Clermont County Children's Protective Services	Manual contains policies solely applicable to CPS staff members.

The Family Children and Adult Services Manual is three volumes in length and contains all ORC and OAC rules applicable to the programs administered by CPS and has recently become available on CD-ROM. Periodically, ODJFS sends the Agency updated rules reflecting any changes to the ORC and OAC. The manual is well organized and user friendly, containing a table of contents and a key so staff members can quickly locate rules by program, rule number, or subject area.

The Permanency Planning Manual contains the Agency's policies and procedures governing adoption, foster care, and Adopt Ohio programs. The manual does not have a table of contents, but colored tabs help organize the manual. Although the manual is frequently updated, outdated polices have not been removed from the manual.

The CPS Policies and Procedures Manual does not have a table of contents, but sections are clearly labeled with colored tabs and placed in alphabetical order. The manual contains only 18 policies and procedures and they are not organized by program or unit function. The CPS in-house manual is not as extensive as in-house manuals from best practice agencies.

F3.14 Lorain County Children's Services is managed under the authority of a Commissioner appointed Board that initiates policies to guide LCCS in its service delivery. Lorain develops procedures in order to implement the Board policies. All policies and procedures are placed online and arranged within the organization's Intranet, including personnel policies and the OAC Family Children and Adult Services Manual. LCCS uses over 100 in-house procedures that are arranged according to general functions which include:

- Organizational directives
- Organization - General (guidelines)
- Administration/Management
- Family-Based Care
- Fiscal
- Human Resources
- Intake
- Life Skills Program
- Protective Intervention
- Public Information/Relations
- Quality Assurance
- Records Management
- Social Services - General
- Special Services
- Support Services

In addition, LCCS has developed a clerical procedure manual to help guide support staff members in their daily operations. Ultimately, LCCS has established procedures that implement Board policies and supplement OAC rules. Lorain's policies and procedures are easily accessible on the organization's Intranet, and they are logically arranged into functional categories.

R3.6 CPS should consider expanding the in-house manual to include additional applicable policies and procedures. This process could be included in the strategic plan as an intended goal with an attached action plan. The following is a list of key policy and procedural areas which could be included:

- Staff training and orientation
- Dictation and record management
- Quality assurance
- Public relations
- Relationships with stakeholders
- Administration

The Agency should consider examining in-house manuals from other county children's services agencies, such as those at LCCS. This process may generate ideas as to what should be included in the manual, as well as how it could be best organized.

F3.15 The CPS in-house manual is not organized in functional categories, whereby specific policies and procedures would exist for each of the Agency's units. The purpose of the policies and procedures manual is to make uniform the decision-making process and routinize daily operations so staff members have a handy reference tool. The CPS manual does not fulfill this function because of the limited material included and fragmented organization.

R3.7 CPS should consider reorganizing its in-house manual to reflect the primary functions performed by the Agency, including: intake, investigations, ongoing, adoption, and foster care. This arrangement would allow staff members in particular units to have smaller, more practical manuals specifically tailored for their jobs. Additionally, orientation materials for new employees could be easily derived from this organizational format. Other PCSAs, including LCCS, use similar formats to organize their in-house manuals (see **F3.14**).

F3.16 The Agency's manuals are located in the offices of the unit supervisors and are accessible to staff members, yet they are cumbersome in size. In addition, commonly used forms are accessible on the staff's computers, but the Agency has yet to place policies and procedures online. The manuals are periodically updated to reflect revisions or changes in policies and procedures. However, old policies and procedures are not always removed from the manuals. Usually, revisions or updated policies and procedures are placed in the front of the manuals which contribute to the manuals' volume.

R3.8 The Agency's manuals should be streamlined as much as possible so staff members are not confused as to which policy or procedure is most current. Additionally, CPS should consider placing the most often referenced policies and procedures online to increase accessibility and improve efficiency. CPS should also consider archiving old policies and procedures to reduce the size of the manuals. By removing old policies, the potential for confusion is reduced because staff members would utilize manuals which contain only current policies. The size of the manuals would also be reduced, making them less cumbersome to staff members.

Agency Methodology for Monitoring the Implementation of Policies and Procedures

F3.17 The Agency provides formal and informal training to staff so new policies and procedures can be implemented consistently. Pursuant to OAC §5153.122, CPS staff members are required to receive 90 hours of core in-service training during the first year of employment. In accordance with state mandate, the Agency also requires new staff members to receive 12 hours of domestic violence training. On an informal level, new employees spend approximately two weeks shadowing veteran staff members in various units to become

familiarized with Agency processes. Additionally, new employees review the Agency's policies and procedures manuals to become acquainted with the pertinent policies and procedures which would be applicable to their position.

R3.9 Once a thorough study has been conducted to identify and formalize new policies (see **R3.10**), management should train employees on Agency procedures that have been formalized as Agency policies. CPS management staff should supplement the current training agenda for new employees by including training sessions on formalized policies. By training new employees on documented procedures based on Agency policies, CPS would be more assured that various practices are consistently applied. The consistent application of policies and procedures helps to ensure that all clients receive a standard level of service.

F3.18 The monitoring of the application of CPS policies and procedures lies primarily with unit supervisors. There are weekly and bi-weekly meetings between caseworkers and unit supervisors whereby new policies and procedures are discussed. Agency-wide meetings are occasionally held to go over new or revised policies and procedures. In addition to verbal communication, management staff sends written notice to caseworkers outlining new policies and procedures and providing guidance on their implementation.

Monthly case record reviews are also conducted by unit supervisors to help ensure the consistent application of policies and procedures (see **F3.49**). The case record reviews provide the Agency with a formal mechanism to monitor the application of policies and procedures within the Agency. The case record reviews also help unit supervisors in detecting problems caseworkers may have with particular policies and procedures. In addition, Agency-wide meetings are held annually so staff members may review policies and procedures. The annual review meetings provide caseworkers and supervisors the opportunity to refresh themselves on older policies as well as to review any new policies and procedures.

C3.4 CPS uses a variety of means to monitor the implementation of Agency policies and procedures. Through meetings, case record reviews and training sessions, unit supervisors are able to successfully monitor the application of the policies and procedures which guide the Agency in providing effective services to children and their families.

F3.19 Based on interviews with staff, caseworkers make little or no distinction between practices based on policy and practices based on procedure. However, staff members assert that the Agency's policies and procedures are easy to understand and well-defined. Questions concerning policies and procedures are directed toward unit supervisors or veteran employees. Staff members also stated that management is always open to discussion regarding Agency policies and procedures. Caseworkers affirm that the policies and procedures help in standardizing everyday operations and providing guidance for effective service delivery.

R3.10 CPS management should perform a study to determine which Agency procedures are based on formal policies versus informal practices. Several areas of operations do not have formally defined methods of conducting business. These areas include: evaluation of case difficulty, required level of detail for case record dictation and specificity of referrals. Once the procedures based on routinized practices are identified, management staff should consider which procedures should be documented under a formal policy. In doing so, caseworkers could more efficiently perform daily operations by following the formally established procedures adopted by the Agency. In addition, CPS would be assured that the most important aspects of Agency practices are carried out in a consistent and uniform manner.

F3.20 For the most part, the County Commissioners office is not involved in the development or revision of programmatic policies and procedures. The majority of policies and procedures that guide the Agency are provided by ODJFS and the County DJFS. The County Commissioners office's involvement in programmatic policy revision might increase, if children's services was provided under the authority of a Board. In Clermont County, however, the responsibility for providing children's services rests with the County DJFS and not under the authority of a Commissioner appointed Board.

CPS does not have a committee to develop or revise Agency policies and procedures. Currently, this function is performed by the deputy director and unit supervisors who hold meetings on a daily basis. During these daily meetings, management has the opportunity to discuss problems and concerns with policies and procedures experienced by the caseworkers. In addition, any new policy mandated by the state is first discussed by unit supervisors and the deputy director, who then develop a plan for the policy's implementation.

R3.11 The Agency should appoint a committee to periodically review Agency policies and procedures and make recommendations for the development and/or revision of policies and procedures. The committee should consist of veteran employees and selected unit supervisors from various units of the Agency. The committee would report its findings and recommendations to the deputy director, who could take the suggested policy revisions to the director of the County DJFS for approval. In establishing a committee to review its policies and procedures, the Agency has the opportunity to improve the guidelines that direct its daily operations.

Confidentiality and Grievance Process

F3.21 CPS has a responsibility to the public to respect and uphold the privacy of children and families. Furthermore, the Agency must hold in confidence all information obtained throughout the course of professional service. Sharing of confidential information is done in a manner consistent with federal and State law, as well as the individual's right to privacy.

The confidentiality of children's services agency records is governed by the ORC and OAC, which contain specific provisions concerning the disclosure of information contained in those records. ORC §5153.17 states that records are generally accessible only by the children's services agency itself, the ODJFS, and the director of the County DJFS. Others may access records upon the written permission of the executive director, if access to the information is for good cause and is in the best interest of the child. If CPS is uncertain about the release of confidential information, the in-house attorney is contacted for an opinion prior to making the decision to release or withhold the information. Other sections within the ORC also contain specific disclosure requirements for records created through their provisions. For example, ORC §3107.17 places certain restrictions on the dissemination of information relating to adoptions and adoption proceedings. ORC §2151.421 addresses the disclosure of information relating to complaints and investigations of child abuse or negligence, and essentially makes such information confidential.

F3.22 CPS does not maintain a comprehensive internal written policy governing confidentiality. Rather, CPS uses the ODJFS Public Records and Confidentiality Laws manual, OAC §5101:2-34-38. The manual provides guidance concerning the release of information by PCSAs relating to child abuse or neglect. The manual states, in part, "This rule...severely limits disclosure of this information and is very specific in delineating to whom and under what circumstances this information may be released." In cases of alleged child abuse or neglect, a PCSA may only release information to the indicated parties under specific circumstances:

- ODJFS staff with supervisory responsibility for CPS
- Law enforcement officials investigating a report of child abuse or neglect or an instance of a knowingly false report of child abuse or neglect
- County prosecutors investigating a report of child abuse or neglect or an instance of a knowingly false report of child abuse or neglect
- Other PCSAs investigating a report of child abuse or neglect

The Agency's staff attorney holds periodic training sessions to help ensure that staff members are aware of the specific requirements relating to issues of confidentiality. CPS also requires new employees to sign an agreement stating that they have been informed of the Agency's policies and procedures on confidentiality. New staff members are made aware of the Agency's confidentiality procedures regarding fax transmissions, computer usage, foster care, and adoption as well as issues covered in the ODJFS manual. Furthermore, CPS uses several forms for the release of confidential client information. These release forms are designated for parties who assist the Agency in providing services. However, CPS still lacks a comprehensive written internal policy with associated procedures on confidentiality.

C3.5 The Agency's training sessions on confidentiality ensure that staff members are aware of the specific requirements associated with Ohio confidentiality laws. Furthermore, periodic training sessions prepare caseworkers in making appropriate decisions involving client confidentiality. Informed decision making on confidentiality issues enhances the safety and protection of children and reporters of abuse, and protects Agency employees from potential liability issues.

R3.12 CPS should consider developing a comprehensive written internal policy with associated procedures on confidentiality. This task could be accomplished in conjunction with the expansion and reorganization process of the Agency's in-house policy and procedures manual. This task also could be included in the strategic plan as an intended goal with an attached action plan and responsible parties for its implementation. According to best practice agencies, a comprehensive internal policy on confidentiality should include, but not be limited to, the following:

- A requirement that all parties performing services for the Agency sign a statement verifying receipt of the confidentiality policy
- A statement that all parties performing services for the children's services agency are obligated to hold all child abuse and neglect investigative information confidential pursuant to ORC §2151.421 and OAC §5101:2-34-38
- A signed confidentiality statement maintained by designated staff members
- An expectation that staff use discretion when discussing client and staff confidential information
- The current law regarding the sharing of pertinent case information with the referring mandated reporter
- A protocol for responding to requests for confidential information from parties external to the PCSA
- The orientation and training of staff regarding confidentiality and the sharing of information
- A crisis protocol for high profile cases that includes time frames and staff responsibilities
- A method for clients to access personal information maintained by the PCSA
- A policy regarding confidentiality and the maintenance and storage of records
- A protocol regarding confidentiality and media relations

In conjunction with the ODJFS manual, an internal policy would help clarify the confidentiality process. Agency guidelines and protocols would assist staff in making sound decisions with regard to confidentiality. Expanded, detailed confidentiality policies may ultimately safeguard and protect CPS from the potential of lawsuits based on wrong decisions concerning client confidentiality.

F3.23 CPS is required by the OAC §5101:2-5-11 to provide birth parents, foster or adoptive parents, legal guardians, children, and alleged perpetrators of child abuse or neglect an opportunity for an administrative review of conflicts, grievances, case resolutions or dispositions. Grievances and/or complaints typically result from the following:

- An individual's dissatisfaction with the action or inaction of staff members
- The untimely or incomplete delivery of services
- The lack of access to certain confidential information
- The resolution or disposition of cases
- Inconsistent application of policies and procedures
- Unclear or misunderstood legal and regulatory requirements

Grievances are typically viewed as an extension of a complaint that cannot be resolved on an informal basis.

F3.24 While there are specific steps involved in resolving grievances, CPS classifies the process into two categories, informal and formal, with a preference to resolve the complaint/grievance at the informal level. The Agency maintains a formal written internal policy with associated procedures for dealing with non-employee grievances. At the informal level, complaints are initially handled directly by the caseworker. If the complainant is unsatisfied, then the caseworker's supervisor intervenes in an attempt to reach a mutually agreeable solution. The supervisor also advises the complainant of the policy for requesting a formal review and provides the person with a written copy of said policy if requested.

F3.25 A program has also been established by the County Commissioners called Clermont Cares whereby individuals who have a complaint with regards to CPS may voice their concerns to the Commissioners. The program was originally established so the Commissioners could respond to any complaint regarding the County's agencies. CPS receives a form from the Commissioners detailing the complaint. CPS then responds back to the Commissioner's office with information as to how they handled the situation. A letter is then written to the complainant outlining the Commissioner's position regarding the grievance. If the complainant is still unsatisfied with the resolution, then a formal review may be initiated.

F3.26 Once a formal grievance has been filed, the formal review must be held within ten working days from the date that the complaint was received by CPS. Written notice of the date, time, and place of the review must be mailed to the complainant not less than five calendar days before the review. The staff attorney acts as the Agency's hearing officer and informs the deputy director that a hearing has been requested. The majority of grievances with CPS involve disagreements with case dispositions, specifically whether or not abuse or neglect charges are substantiated.

At the review, the complainant, the caseworker, and the supervisor are all given an opportunity to testify and present evidence. Any physical evidence or documents are retained as part of the record. Only the parties and the hearing officer may be present for the entire hearing. Additional witnesses may only be present during their own testimonies.

The hearing officer issues a written decision to all appropriate parties involved in the formal review within five working days. The decision is solely based upon the evidence presented at the review. A copy of the decision is then mailed to the complainant, placed in the case file, and given to the caseworker and supervisor. The hearing officer keeps a separate physical file of all information regarding the grievance hearing. The grievance file is also kept in a separate folder in the hearing officer's WordPerfect software.

F3.27 *Standards for Effective Practice* recommends including the following items in a formal written grievance policy with associated procedures:

- The identification of parties who may seek formal redress of grievances
- An established process describing how grievances are received by the PCSA
- Designated staff members responsible for conducting the grievance process or hearing
- An established time frame for grievance process to be initiated and completed
- An established process for providing written decisions to those involved in the grievance process
- A method for documenting, reporting, and maintaining documents associated with the grievance process

C3.6 CPS maintains an effective written grievance policy with subsequent procedures for those individuals participating in the Agency's programs. The Agency's formally established grievance process gives clients an avenue to express criticism about the Agency's delivery of services. The written grievance policy provides complainants of CPS with an impartial forum to seek redress of grievances.

F3.28 Clermont County CPS does not publish grievance information in a brochure for clients. However, Lorain County Children's Services offers pamphlets regarding a client's right to complain about Lorain's services. The pamphlet provides clients with the names and phone numbers of personnel who could address clients' concerns and complaints. Clients are given the pamphlet, describing their rights, upon their first Intake visit. The pamphlets are also available in the lobby at LCCS and given to anyone who wants to register a complaint.

R3.13 CPS should consider developing a pamphlet that informs clients of their rights regarding complaints and grievances of Agency services. The Agency should include the formal grievance policy, as well as the names and phone numbers of those responsible for hearing the grievance. Upon their first visit to the Agency, clients should be given the pamphlet and

caseworkers should explain clients' rights regarding complaints and grievances of Agency services. CPS should develop the pamphlet in conjunction with other consumer information brochures that describe the Agency's various services (see **R3.24**). By distributing a pamphlet describing the client's right to complain, the Agency can easily inform complainants of the appropriate channels to seek redress of grievances.

The various methods whereby clients may seek a redress of grievances should be explained by caseworkers and made available upon a client's first visit to the Agency. CPS should consider displaying the titles and phone numbers of the persons responsible for addressing client complaints and grievances in the lobby. In addition, the Agency should display information about the Clermont Cares program and the phone numbers of the persons at the Commissioner's office responsible for handling complaints and grievances (see **F3.25**). Information on client's rights to complain should also be provided to visitors of the Agency's Web site (see **R3.18**). By informing clients of the various channels through which complaints may be lodged, the Agency increases its accountability in providing efficient and effective services.

CPS management staff should also review the procedures governing client's rights from Lorain and other best practice agencies on an annual basis. In doing so, CPS will gain new and innovative ideas relating to the dissemination of client's rights information and various complaint and grievance policies. By comparing its procedures relating to client's rights with best practice agencies, CPS is enabled to effectively provide grievance information to its clients.

F3.29 Written grievances and verbal complaints received by CPS are processed and documented in the related case file. Following the review process, written grievances and subsequent decisions are retained by the hearing officer in a hard copy file and a separate file is maintained in WordPerfect. However, there is no centralized compilation of the grievances received by CPS. Grievances are recorded and resolved on an individual basis, and statistics regarding such relevant information as to the type, severity, time needed to reply or ultimate resolution of these grievances are not compiled. As CPS cannot compile statistical information on grievances, the Agency is unable to identify programmatic areas to improve upon and/or operational weaknesses.

R3.14 CPS should initiate the necessary procedures to create and maintain a centralized grievance database, rather than maintaining a grievance file in a word processing software folder. All relevant information about the grievance should be captured by the hearing officer in specialized case management software. More information regarding case management software is discussed in **R3.19** and **R3.20**. A centralized grievance database would allow the management staff to regularly analyze data to produce meaningful statistics which could be utilized as part of staff evaluations. More importantly, Agency administrators could use this

statistical information to more effectively manage daily operations and respond to external concerns.

Verification of the Licensing of Foster Care Providers

F3.30 All County administered foster homes contracted by the Agency must have a valid foster care license issued by ODJFS. These licenses are obtained when CPS makes a recommendation to ODJFS on the potential foster family's behalf. OAC §5101:2-5 establishes guidelines for PCSAs when recommending a foster home for certification. When individuals contact CPS to initiate the process to become foster parents, the Permanency Planning Unit has 10 days to respond and inform them of the requirements. The Agency then conducts 12 hours of pre-service training with the individuals. The general requirements to become a licensed care giver include:

- Completion of pre-service training
- Completion of foster care application
- Medical report
- Reference check
- Criminal background check

The Agency must also complete a home assessment, including a physical check of the home; fire inspection; examination of family income; analysis of dates from required documentation; determination of the age, sex and number of children the home can accommodate; determination of arrangements for alternative care; and personal interviews of the applicant and family members. Once the initial requirements have been met, CPS may recommend to ODJFS that the home be licensed. The Agency is responsible for maintaining these licenses and initiating the procedures to renew them on the appropriate dates.

F3.31 CPS also contracts with third-party, or network, providers of foster care services because many children need specialized therapeutic care not offered by Agency foster parents. In FY 1999, approximately 56 percent of the children in the Agency's custody were placed with network providers. CPS contracts with 28 network providers, and their rates vary depending upon services rendered by the particular provider.

Third-party providers have their own network license, issued by ODJFS. This license gives them the authority to recommend foster parents for licensure within their own network. If CPS is interested in obtaining the services of a particular provider, the Agency contacts its contract negotiator from the County Commissioner's office to start the contractual process. Before a contract is established, though, the negotiator requests a completed packet of materials from the network provider. A copy of the network license is included in the packet

of materials, but not copies of the licenses for the foster homes themselves. Therefore, the network providers are responsible for verifying that the licenses are updated and current for their foster parents.

Relying on the network provider's agreement that their homes are licensed has been an area of concern for the Agency. In the past, CPS has had to remove children from network foster homes because the Agency discovered that the foster parent's license had expired. Since CPS is still responsible for children placed in network foster homes, the possibility of expired licenses could create problems for the Agency and even jeopardize the safety of the children.

As part of their contracts with network providers, both Marion and Lorain require network providers to submit valid licenses for each foster home where children are placed. In doing so, the agencies reduce the risk of having to remove children from foster homes where licenses have expired.

R3.15 CPS should consider requiring network providers to submit a valid copy of a foster home's license as a component of the contractual agreement. This policy should be stipulated in the various contracts that CPS has with the network providers. CPS should record the license expiration date in the Agency's FACSIS database and should ensure that all license renewals are also recorded. This would ensure that a valid license exists at the time the caseworker decides on the location of the placement. It would also give the Agency the opportunity to assist in monitoring the license re-certification process of network homes and would reduce the likelihood of the Agency having to remove children from network homes whose licenses have expired.

CPS should track foster home licenses on an ongoing basis. Data should include: the date the home was licensed, the number of children the home can accommodate, the level of services available in the home and the license expiration date. On a monthly basis, the CPS administrative assistant should contact the foster homes whose licenses are about to expire to ensure the renewal process has been initiated. The network provider or the foster home itself should furnish CPS with a photocopy or facsimile of the renewal as soon as it is received from ODJFS. If licensure problems are identified within a particular provider's network, CPS could further investigate to reveal any additional licensure problems.

F3.32 Title IV-E of "The Social Security Act" authorizes the payment of federal funds to states to provide foster care to children who have been removed from their homes through a voluntary placement agreement or judicial determination. At the local level, each county's PCSA administers funds provided under Title IV-E of the Social Security Act in accordance with the rules adopted by ODJFS.

PCSA's are authorized to enter into contracts with private and public foster care agencies to provide care and services which it deems to be in the best interest of any child who needs or is likely to need public care and services. Clermont County CPS has not established any contracts with other public foster care agencies. However, the Agency administers 53 foster homes within its own network and contracts with approximately 28 private foster care agencies. CPS receives monthly invoices from the private foster care agencies containing specific information on each child, his or her per diem rate and the number of days in placement. Each month, CPS pays the agencies based on their previous month's invoice, and reports to ODJFS the amount paid for each child and for other services including, but not limited to, case management, transportation for the children, recruiting and training foster parents.

A recent AOS audit of Montgomery and Franklin County private and public foster care agencies found that the "Ohio's system of state supervised, county administered foster care has significant gaps in monitoring and oversight. As a result ... [the system] is ineffective in protecting children and providing permanent placement and inefficient in the cost of quality of services delivered. The general lack of written agreements that clearly identify the duties and responsibilities of the contracting parties and remedies for breach contributed to the inefficiencies".

F3.33 Clermont County CPS maintains separate contracts with 28 private foster care agencies. Contracting with the private agencies is necessary because the number of foster parents is limited in Clermont County, and many children need specialized therapeutic care not offered by Agency foster parents. Each contract follows a standard format whereby guidelines are established to facilitate the purchase and delivery of services between CPS and the private foster care agencies. In order to monitor the financial activities of the private agencies, each contract includes the following provisions:

- CPS and the County DJFS may review all financial information pertaining to the expenditure of contracted funds.
- Contracted provider will maintain independent books, records, payrolls, documents, accounting procedures and practices which sufficiently and properly reflect all direct and indirect costs of any nature expended in the performance of the agreement. Such records will be subject at all reasonable times for inspection, review, or audit by duly authorized federal, state, and County DJFS personnel.
- Provider agrees to, if required by the County DJFS and/or CPS on the basis of evidence of misuse or improper accounting of funds for which the provider is responsible, have conducted an independent audit of expenditures and make copies available to the County DJFS and/or CPS.

- Provider warrants that claims made to the County DJFS for payment of purchased services will be for actual services rendered to children and do not duplicate claims made by the provider to other sources of funds for the same service.

R3.16 In its role as the County Agency responsible for the administration of foster care, CPS and its contract negotiator must take the necessary measures to close gaps in monitoring and oversight. To reduce management control weaknesses over foster care reimbursements and services, the County DJFS, CPS and its contract negotiator should implement the following steps:

- Establish a standard contracting requirement for CPS using the services of private agencies that effectively sets forth all applicable compliance requirements, fiscal accountability standards and allowable cost.
- Design and implement an effective system of program monitoring of private agencies to ensure fiscal accountability and program compliance that includes desk reviews of all cost reports and periodic site visits at private foster care agencies.
- Design and implement a cost reimbursement system that properly classifies and allocates cost in a manner that ensures claims are properly submitted in accordance with applicable rules and regulations.
- Establish guidance that sets forth minimum standards for private foster care agencies to document their fiscal accountability and legal compliance to CPS, ODJFS, the Auditor of State or their designated representative during an audit or review.

Appropriateness and Potential Uses of Technology

F3.34 In FY 1999, ODJFS provided the entire Agency with desktop computers, giving caseworkers and management staff access to the statewide ODJFS network. Informal training on the new computers was provided on an individual basis for staff members by in-house technical support staff, made up of two workers employed by DJFS. Selected staff members also use computers provided by the County Information Systems Department (ISD) that are networked with other County agencies. However, the majority of the Agency's operations are performed with the computers provided by ODJFS. The state computers provide caseworkers with the following:

- Corel 8 Suite (Includes WordPerfect, Quattro Pro and Paradox)
- Netscape Navigator 4.5
- Group Wise E-mail system
- Families and Children's Service Information System (FACSIS)

- Adopt Ohio Tracking System
- ODJFS Inner Web

Based on information obtained from staff interviews, caseworkers at CPS primarily use WordPerfect for case notes and FACSIS for obtaining background information on clients. Standard forms, like the risk assessment and Semi-annual Administrative Review (SAR) forms, are accessible to staff in a shared directory and can be transmitted electronically through the Group Wise E-mail system. Since caseworkers are still in the process of familiarizing themselves with the recently installed state computers, neither the E-mail system nor the other state-supplied software are being used to the fullest extent.

R3.17 CPS management staff should require caseworkers to undergo formal training on the various software applications available on the state computers. Computer training sessions are offered by ODJFS through the Training Opportunities for Program Staff (TOPS) program. The TOPS training sessions are offered on a quarterly basis at Clermont College. CPS management staff can also request computer training for caseworkers from the County ISD who provides countywide support in desktop computers, database systems, remote system access, and general information technology. Management staff should require caseworkers to take full advantage of these available training resources to help maximize the efficiency and effectiveness of daily operations.

F3.35 As stated in the upcoming section on *agency interaction and communication with the community*, the Agency needs to communicate with the general public for many reasons, including the following:

- To develop a community-wide understanding of its duties and objectives
- To provide foster care recruitment and training information
- To offer employee recruitment information
- To educate the public as to the various programs offered through CPS

Each of these general public communications issues can be addressed through the use of a Web site. Although CPS has a Web page that describes its basic functions on the Clermont County Web site, it cannot be accessed through children's service links. CPS management stated that the Agency has not developed a customized Web site because the majority of its clientele does not have access to computers or the Internet. However, those in the community who generally provide support for children's services initiatives do have access to the Internet and should be able to access information about the Agency's operations and various programs.

F3.36 Other children's services agencies have developed Web sites to meet communication needs at a relatively small cost. An Internet Web site provides a readily accessible source of

information for community members to inquire about child welfare issues. A Web site can also benefit a children's services agency by advertising employment opportunities and providing mandated reporters of child abuse and neglect with important information regarding reporting procedures.

Lorain County Children's Services has a Web site that contains pertinent information about the organization, such as statistics regarding cases, common indicators of child abuse and neglect, foster care and adoption opportunities, adoption photos and biographies, employment opportunities, professional development and training and information on scheduling speakers. The Web site was developed at a cost to Lorain of approximately \$4,000, including \$480 in annual maintenance fees. LCCS also purchased Web site access analysis software which enables the organization to determine certain characteristics regarding Web site hits. For example, the software allows LCCS to determine the amount of hits in a given time frame, and it can also determine the number of pages scanned by visitors. In its first six months of operation, the LCCS Web site received 15,184 hits.

Marion County Children's Services had recently hired an outside vendor to develop a Web site for the cost of \$3,000. The development package included one year of outside technical support and training for an in-house staff member who would be able to provide maintenance on the Web site in the future. Marion opened the Web site on April 1, 2000 as part of the organization's contribution to National Child Abuse and Neglect Prevention Month. In its first week of existence the Web site received approximately 60 hits, familiarizing Web site visitors with information on the organization's history, mission, objectives, and programs.

R3.18 CPS should consider developing a customized Web site to improve the quality and quantity of information provided to external individuals interested in the Agency, such as community members and others interested in issues related to children's services. The following items should be included in the site:

- Mission statement and goals
- Grievance policy and related information
- Employment opportunities
- Relevant statistics
- Calendar of upcoming special events and speaking engagements
- Agency releases to the media and summary of recent news media coverage
- Volunteer opportunities
- Information regarding foster care and adoption, including on-line inquiry forms
- Information on child abuse and neglect reporting procedures
- Answers to frequently asked questions
- Related children's services links

Financial Implication: Development of a Web site could cost between \$1,000 and \$4,000, depending upon the complexity of the site. The Agency could offset monthly monitoring charges by requiring that these maintenance duties be performed by in-house technical support staff. Alternatively, the Agency could investigate the possibility of enhancing its Web page on the County Web site. The Agency could also explore the option of establishing its Web site as a link from the Web site of a larger agency. This would be a lower cost for CPS.

F3.37 All CPS employees have access to the Corel suite of software, which includes word processing, spreadsheet, database, graphics and calendar applications. These resources are currently unused or underutilized due to a lack of planning and training. The Agency standardized to the Corel suite of software since acquiring the majority of its windows-based workstations from ODJFS in FY 1999. The WordPerfect software is primarily used by staff for word processing and to store and retrieve basic information relating to casework.

One program within the Corel suite that is currently unused and could be of particular benefit to the Agency is the Corel Paradox database program. This database program operates in a windows-driven environment and contains extensive tutorials and user help features, making the establishment of databases fairly simple. An experienced database user could utilize several other Paradox features as follows:

- Conduct queries, which extract specifically designated information, from one or more of the established databases
- Present the results of queries in reports to communicate information in a desired format
- Create forms, which allow a simple data entry structure for those adding or modifying information in a database
- Create charts which present information in a graphic format
- Produce mailing labels by extracting specified information from a database
- Merge specified data into form letters
- Import data or text from word processing or spreadsheet programs

R3.19 CPS should use all aspects of the Corel software to better manage Agency processes. For example, the Corel Paradox database could be used to create a database to store grievances lodged against the Agency (see the *confidentiality and grievance process* section) and to create a database to store the zip codes of children placed into foster care. A simple query could be performed that would match information from this zip code database with potential foster care providers in the area, allowing the Agency to perform community outreach in areas where high populations of children needing foster care exist. Paradox could also be used to provide daily alert listings displaying events pending for each client in a pre-determined period of time and the date the event or action is scheduled. Supervisors could use this function to create a listing of overdue actions for all workers supervised, a display or listing

of all caseworkers' clients to assist supervisors in reassigning cases due to staff turnover and a listing of upcoming reviews within a supervisory unit. In addition, CPS could use this software to manage simple caseworker processes, such as case assignment dates, relevant placement data, case progress and personal notations about relevant issues. The features outlined in **F3.37** are at the core of Agency processes and could be fully employed with the assistance of in-house technical support staff.

- F3.38 The Agency currently uses the FACSIS software supplied by ODJFS to report management information, compliance data, case tracking data, data to support child welfare program evaluations and data to support the Title IV-E payment system. FACSIS is a statewide child welfare system used by 83 PCSAs and 100 private agencies. ODJFS maintains the host FACSIS, a mainframe database that is updated nightly with data transmitted from the agencies' FACSIS systems. The FACSIS software was developed in 1986 and has been upgraded infrequently since then. The software is a DOS-based data entry system that cannot perform simple case management processes, such as recording and tracking participant performance. In addition, the software cannot be used as a database to share or store state mandated documents that include risk assessment forms, Semi-Annual Administrative Reviews (SARs), individual case plan forms or notice of change/placement forms.

Over the last several years, ODJFS has been developing an upgraded version of FACSIS, called the Statewide Automated Child Welfare Information System (SACWIS), which was to provide children's services agencies with improved technology. Examples of the functions that SACWIS would perform include the following:

- Data file sharing capabilities
- Trend analysis capabilities
- The ability to link case file data to existing financial systems to ensure the appropriate reporting of program costs

Although SACWIS is far from release, ODJFS has established the FACSIS/SACWIS project to design and implement SACWIS. The project team has established several committees to assist children's services agencies in the conversion from FACSIS to SACWIS.

- F3.39 ODJFS has established the Executive Leadership Committee (ELC), under the FACSIS/SACWIS Project, to design new case management software for county children's services agencies and to address issues relating to compatibility and conversion to the new state system. The ELC is comprised of ODJFS technical staff and 12 directors of various county children's services agencies. In addition, the Technical Partners Committee has been established to resolve any technical issues relating to statewide case management systems. The Technical Partners Committee is currently trying to resolve the issue of remote access capability to the FACSIS system for county caseworkers. The committee is also working in

conjunction with several technical support staff members from county children's services agencies.

On July 3, 2000, the ELC released statewide case management software to all county children's services agencies. The Family Assessment and Planning Tool (FAPT) software is a caseworker focused application that guides the worker through the creation of Family Risk Assessments, Case Plans, and Semi-Annual Administrative Reviews (SAR). All data entered into the FAPT will be maintained in the current FACSIS system. Furthermore, the FAPT software supplements the existing FACSIS system and will interface with any new statewide case management systems. In order to receive the FAPT software, caseworkers at the county level will be required to receive operational training on the new programs.

- F3.40 Other county PCSAs have developed their own case management software systems because of the delays associated with the release of SACWIS. Some of the larger metro children's services agencies with growing caseloads have realized the need for case management software to assist management in improving service delivery.

Summit County Children's Services (SCCS or Summit) has developed a comprehensive case management system called Kids 2100, at an approximate cost of \$1.8 million. Of this total, \$1.5 million was for consulting costs associated with development of a windows-driven software system. The remaining costs were for a database server and other equipment. The Kids 2100 software is used by screeners, supervisors and caseworkers to store and track the status of cases throughout their cycle. Features of the software include tracking and prioritizing case plans, tracking child placement, and assisting the agency in developing a training schedule to license foster care providers. The system tracks all placement data, caseworker progress, waivers and/or extensions and other data. It was designed by social workers and produces reports for the county auditor for the automatic payment of foster parents. The primary focus of the system is caseload management through the reduction of data entry for redundant information such as names, social security numbers and addresses. The system has allowed the agency to eliminate seven forms and parts of other forms which previously required manual completion by caseworkers.

Franklin County Children Services (FCCS or Franklin) has also developed a case management system called KidsKids that functions beyond the capabilities of the FACSIS software. For example, the software can identify and track foster care payments by linking and defining all expenditures related to individual cases. The software can also track the time social workers spend with children, case outcomes and recidivism rates. The development of these enhancements cost the agency approximately \$170,000 in consulting costs. The FCCS system is a modification of FACSIS and was largely programmed in-house.

R3.20 The Agency should implement a case management software system with the necessary functionality to effectively track and manage case data. Whether the Agency chooses to develop its own case management software or rely on state-released software, like FAPT (see **F3.39**), CPS needs the technological means to compile, track and report case management information. Case management software would reduce the Agency's reliance on hard copy documents and improve the overall case management reporting and tracking process. In addition, case management software would make it easier to transfer a child from one caseworker to another and would demonstrate more clearly the different intensity of work required for each case. In developing its own case management software system, the Agency should consult other children's services agencies, like Summit and Franklin, to seek advice on the development and implementation of the software.

Should CPS choose to develop its own case management software, there are several issues the Agency needs to take into consideration. For example, the Agency would need to assess whether it has the available funds for the development of such a software package. In addition, CPS would need to develop software which would be compatible with SACWIS or any other state released management software. CPS stands to lose its invested monies and resources if the Agency develops software that is incompatible with SACWIS. However, the release of SACWIS is unknown and the Agency currently lacks the technological capability to effectively report, compile and track case management information.

F3.41 The Agency has laptop computers available for caseworkers who are working in the field, however they are not being fully utilized. Based on interviews with various caseworkers and in-house technical staff, caseworkers have found it easier to manually write out information and then return to the office to enter it on their desktop workstations. In addition, Agency caseworkers are not able to remotely access FACSIS with the use of the laptop computers. In-house technical staff assert that FACSIS is an old text-based mainframe application that relies on the state's mainframe system, and it can only be accessed through the ODJFS network available to caseworkers at their office workstations. Since a majority of the Agency's operations are based on information located in FACSIS, caseworkers need to remotely access the state system to make better use of the laptop computers.

R3.21 The Agency should consider designating the laptop computers to the investigative caseworkers who work most often outside of the office. The laptop computers could be established as their primary workstations, allowing the caseworkers to record client information only one time. In doing so, the staff would increase productivity and efficiency by eliminating the duplication of efforts. The Agency should install docking stations, linked to the ODJFS network, for times when the investigative workers are in the office. Additionally, CPS should consult with the Technical Partners Committee (TPC) for advice on remote access capability into the FACSIS system (see **F3.39**).

F3.42 CPS has not developed a strategic technology plan. However, the technical support staff does have long-term goals regarding Agency technology. For example, the Agency is exploring ways to share information more efficiently between various agencies within the County DJFS. However, long-term technology goals have not been formalized into a strategic plan with specifically designated parties responsible for their implementation.

In its most recent strategic plan ending in FY 1999, Lorain County Children's Services had incorporated a section of goals regarding Agency technology. Each goal was associated with a designated individual who was responsible for the goals implementation. In addition, the goal was to be implemented by a specified date. Examples of goals regarding Lorain's technology that were part of the strategic plan included the following:

- Ensure that computers are in place for Clerical, Fiscal, supervisors and managers
- Identify and determine hardware and software needs to provide remote access to the LCCS server
- Install hardware and software for identified remote access
- Survey managers and supervisors to learn client information desired on database
- Work with programmer consultant to determine if an existing database would fit LCCS needs, or develop a database internally
- Continue development of new fiscal software to track revenues, expenditures and fund balances

R3.22 In conjunction with the County DJFS and the County ISD, CPS should identify its technology needs and establish goals which would be incorporated into the proposed strategic plan (see **R3.5**). In working with ISD to establish goals regarding technology, CPS is encouraged to contact LCCS to seek advice on the incorporation of technology goals into the strategic planning process. Management and in-house technical support staff should also contact the Executive Leadership Committee (ELC), under the FACSIS/SACWIS Project at ODJFS, in order to anticipate the release of any new statewide software or database applications. In establishing its technology goals CPS will be able to foresee any statewide mandates regarding technological changes. The following steps should be taken by the Agency in identifying its needs to establish goals regarding technology:

- Identify and analyze the daily operations in the children's protection environment that technology must support
- Define key goals and objectives of the Agency and establish measurable success factors for those areas in relation to technology
- Evaluate how existing hardware and software applications support the long-term goals and objectives of the Agency
- Research significant industry trends relating to technology and children's protection organizations or other public sector organizations

- Determine what technology is needed to help the Agency achieve its long-term goals and objectives
- Identify user requirements for case management and financial software applications, as well as E-mail and Internet software
- Clarify Agency-wide training issues, such as basic computer skills development for all staff, and establish an internal process for scheduling more in-depth software training for selected staff members
- Define key policy issues such as the development of employee technology manuals which address proper usage, security concerns and disciplinary guidelines for abuse

Effective technology planning can result in a computing environment which allows more efficient use of staff time and therefore more effective delivery of services. The result of this process should be a step-by-step action plan detailing how the Agency expects to meet its short-term and long-term goals regarding technology. These goals should be established in conjunction with ISD who can assist in assessing the Agency's current technical infrastructure. The architecture is a blue print that specifies the technical infrastructure (hardware, network configuration and system software), software application systems and available database systems. Goals regarding technology should include the following:

- Individuals responsible for implementation
- Estimated resource requirements to implement actions
- Benchmarks to determine progress in meeting stated goals
- Expected benefits for the Agency as a result of a goal's implementation

Once the established goals regarding Agency technology are incorporated into the proposed strategic plan, CPS may be able to maximize its available technology and provide more efficient and effective services to its clients.

Agency Interaction and Communication with the Community

F3.43 CPS uses a variety of means to communicate its mission and objectives with the community. Various schools, women's groups, churches, head start agencies, and other civic organizations often request speakers from CPS to explain its programs and services. All speaking engagements with community organizations are coordinated by the deputy director, who then shares the information with the supervisory staff. Generally, unit supervisors give the presentations, but occasionally staff members participate in presentations as well. CPS also sets up booths at the County fair and area shopping malls to distribute information about its services. During National Child Abuse and Neglect Prevention Month, the Agency initiates poster and essay contests in area schools and the winning projects are displayed on billboards throughout the community. CPS also contributes to a County newsletter, called *The*

Dialogue, outlining its recent accomplishments and upcoming projects. The newsletter is released to the community on a quarterly basis.

Marion County Children's Services is actively involved in the community, informing the public of its various services and programs. MCCA staff members participate in some of the organization's numerous public relations activities, including speaking engagements and community education projects. In addition, MCCA distributes a quarterly newsletter to approximately 500 key stakeholders throughout the community.

C3.7 CPS management staff actively participates in numerous public relation engagements, informing the community about the Agency's services and programs. By actively participating in public relation engagements, the Agency is better able to garner support from the community for its mission of protecting children from abuse and neglect.

F3.44 CPS relies on the County Commissioners' Public Information Officer to distribute information about protective services to the media and the community at large. The position was recently filled, yet it was vacant for approximately nine months and throughout the course of the audit. While the position remained vacant, the Agency used its staff attorney for public relations. According to the position's vacancy announcement, the Clermont County Public Information Officer is responsible for the development and production of public information communication of County programs, projects and services. Other job duties listed in the position's vacancy announcement include the following:

- Writes, edits, photographs, prepares layout, and arranges for publication of newsletter and other informational publications
- Researches and analyzes information (e.g., directory of County information sources, and development of a Clermont County Resource Guide)
- Provides assistance in locating appropriate officials and phone numbers for addressing problems and concerns
- Maintains and/or participates in speaker's bureau and coordinates news conferences
- Videotapes and photographs regular sessions and other meetings and events as assigned

Decisions that PCSAs make on a daily basis are often based on court decisions removing children from their homes. Clients are often distressed and filled with emotion, creating hostility between clients and children's services agencies. These types of situations necessitate a public relations employee to not only deal with bad publicity, but to emphasize the importance of PCSAs in protecting a county's children.

F3.45 Marion County Children's Services employs a Community Education/Public Affairs Specialist who coordinates all public relations activities for the organization. In addition to coordinating

public affairs for MCCA, the specialist has developed a crisis communications plan to help curb bad publicity in crisis situations for MCCA. The specialist also provides an itemized publicity budget for management staff to track every dollar spent on publishing for the organization, as well as every dollar saved by taking advantage of free publicity. Examples of the job duties performed by Marion's Community Education/Public Affairs Specialist include the following:

- Coordinates and schedules all speaking engagements and community education projects
- Liaison with community social service agencies and other organizations for interagency prevention program agreements, contracts, and compacts on marketing/media events
- Organizes and supervises the coordination and implementation of agency levy campaigns
- Coordinates and implements month-long events and public relations associated with annual Child Abuse and Neglect Prevention Month in April and Foster Parent Appreciation Month in May
- Develops MCCA Web site and maintains on an ongoing, regular basis, including the development of new online material
- Provides training services to mandated abuse reporters in the community by providing quarterly six hour and three hour child abuse and neglect identification training
- Offers public relations guidance to other PCSA's in Ohio through regular meetings and project sharing

Logan County Children's Services (LCCA or Logan) recently consulted the Public Affairs Specialist from MCCA seeking advice and expertise for the development of such a position for its organization.

R3.23 CPS management staff should identify key public relations objectives which would contribute to the accomplishment of the Agency's mission and goals. Upon the identification of public relations objectives, the Agency should determine whether these objectives could be performed by existing in-house staff and the County Public Information Officer. At this point, the Agency should assess the need for a full-time permanent position dedicated to performing public relations solely for CPS.

CPS should also consider formulating additional job duties designated for the County Commissioner's Public Information Officer, in order to promote CPS and its mission. The management team could collectively develop new plans and initiatives which would enhance the Agency's role in the community. CPS may also wish to consult public information officers from other county children's services agencies, like MCCA, to seek advice on innovative approaches to public relations.

F3.46 CPS does not use consumer information brochures. Consumer information brochures provide explanations of the Agency's various services and programs. Brochures could also help in promoting the Agency's role in the community. The Agency has expressed interest in using such brochures, but nothing has been developed thus far.

Logan County Children's Services has developed consumer information brochures that describe the organization's mission, services and programs. Logan distributes a variety of brochures which inform clients and the community of the following:

- Organizational functions and services
- Percentage breakdown of funding sources
- Child abuse and neglect reporting procedures and guidelines
- Information on the organization's foster care program and guidelines for becoming a foster parent
- Information on adoption services with frequently asked questions and Logan's responses
- Information on the parent education program offered through the organization
- Guidelines on appropriate parental supervision with a list emergency phone numbers in the area
- Guidelines for children in troubled homes who need to seek safety
- Information on Logan's neighborhood outreach center

LCCS's consumer information brochures provide helpful guidelines to help further the organization's mission of enlisting the community's support to protect children and preserve families.

R3.24 CPS should consider developing consumer information brochures describing the Agency's purpose, services and operations to distribute to all current and new clients. The brochures could also address other important areas including:

- Client's rights and responsibilities in dealing with the Agency
- Foster care recruitment and training information
- Non-employee complaint/grievance policy
- Alternative programs offered through CPS

In addition to its client base, CPS should consider distributing brochures to a wider audience in order to convey its mission and operations to the community. The Agency could distribute consumer information brochures at area public libraries, as well as other social services agencies. By making the brochures available to a wider audience, CPS increases its ability to garner support from the community which ultimately helps in passing children's services levies. In addition, wider distribution of Agency brochures could give potential reporters of child abuse or neglect more information regarding reporting procedures.

Customer Satisfaction and Quality Assurance Initiatives

F3.47 In order to assess customer satisfaction levels, CPS has developed a citizen/client questionnaire based on the lessons from the "Managing for Results" program (see **F3.11**). Conducting periodic customer service evaluations provides PCSAs with critical information regarding the qualitative aspects of the service provided while providing an opportunity for the customer to articulate concerns and issues and provide feedback. The questionnaire, developed by CPS, contains a series of statements that describe the services provided by the Agency's caseworkers. Clients are given five options to assess the services provided by the caseworkers. The questionnaire also contains open-ended questions so clients can provide detailed evaluative responses. The Agency has yet to distribute the citizen/client questionnaire because the Commissioners wanted to develop a uniform questionnaire for all County agencies. Though the Agency's questionnaire has been delayed, CPS would still like to distribute its own questionnaire, specifically designed for clients of children's services.

F3.48 Lorain County Children's Services has developed a comprehensive surveying program as part of a Quality Assurance Plan. LCCS contracts with Lorain County Community College to conduct surveys with several groups, including: clients in active and closed cases, foster parents, mandated reporters, as well as children and families served by the organization. The local college uses advanced computer software to compile and organize responses in order to provide LCCS with statistically significant data on a quarterly basis.

R3.25 CPS should develop a comprehensive surveying program in order to assess customer satisfaction regarding its programs, operations, and service delivery. The Agency could use the citizen/client questionnaire as a model for developing survey questions for a variety of groups who receive services from CPS. Initially, management could explore the possibility of establishing a contract with a local college in order to conduct surveys and compile data for the Agency. If such a contract is established, management staff could analyze and evaluate the compiled survey data on a regular basis in order to identify areas of concern that may require improvement. A surveying program could help the Agency determine whether or not services provided are appropriately, effectively and efficiently meeting the needs of children and families. CPS should consider contacting LCCS for information concerning its contract with Lorain County Community College, as well as any additional information on its surveying program.

R3.26 CPS may wish to consider other means to assist in assessing the level of customer satisfaction with Agency services. These alternative methods could be developed and implemented by a quality assurance committee discussed in **R3.27**. Based on best practice standards, alternative methods used to assess customer satisfaction include the following:

- Focus groups, representing a cross cultural section of the community
- Reviews of non-employee complaints and grievances
- Written surveys from various client groups
- Client interviews

The Agency should also consider developing evaluative questionnaires to distribute to clients and family members at different points of service delivery. CPS could use the citizen/client questionnaire (see **F3.47**) as a format to develop other questionnaires for clients and relatives who are at different stages of service, including: intake, ongoing, temporary foster care and permanent custody. By evaluating the responses from questionnaires at different points in the service delivery process, management staff can more easily identify operational weaknesses and areas that need improvement.

F3.49 CPS management staff also conduct case record reviews in order to ensure the quality of services provided by Agency caseworkers. Although ODJFS requires Semi-annual Administrative Reviews (SAR) for children in placement and annual reviews for all open cases, CPS has developed a more stringent policy requiring case record reviews on a monthly basis for all of its cases. Moreover, case record reviews within the Intake and Ongoing Units are conducted on a weekly basis. The Agency uses a standardized review document, customized for each of its units. The review document enables unit supervisors to assess the level and accuracy of case dictation and to determine if certain in-house policies and standards have been achieved. For example, case record reviews assist management staff in determining whether dictation is up to date and whether visitation requirements have been met by caseworkers. Unit supervisors use the compiled results of case record reviews to produce monthly reports which indicate the current status of all Agency cases and their level of compliance with state regulations and in-house policies and procedures.

C3.8 The Agency has developed an effective policy requiring that case record reviews be conducted on a monthly basis throughout the various units for the purposes of quality assurance and administrative compliance. Moreover, case record reviews are conducted on a weekly basis within the Intake and Ongoing Units. This in-house policy far exceeds the ODJFS requirements regarding SARs, pursuant to OAC §5101:2-42-43, for children in placement and annual reviews for the remaining open cases.

F3.50 Unit supervisors use the compiled results of case record reviews to produce monthly reports which are then evaluated by the deputy director. The supervisor's monthly reports indicate the current status of all Agency cases and their level of compliance with state regulations and in-house policies and procedures. By analyzing each unit supervisor's monthly report, the deputy director is provided with crucial information relating to the status of each unit. Examples of information provided by monthly reports, include the following:

- Type and number of caseloads amongst various units
- Number of finalized adoptions
- Amount of complaints and grievances
- Number and status of protective custody cases
- Amount of foster care placements

Monthly reports provide the deputy director with the data needed to determine whether or not particular units need redirection or more support. Furthermore, they provide the basis for important managerial decisions regarding Agency restructuring and improvement.

F3.51 Lorain County Children's Services has developed an Oversight Committee (or Committee) which monitors the organization's various quality assurance initiatives. The Committee monitors and tracks the status of identified problems to ensure improvement and prevent future problems. The Committee may initiate focus groups to address specific problem areas, or may identify areas where special consultation or expertise is needed to improve the quality of services. The makeup of the Committee includes the deputy director, various management staff, and selected staff members.

F3.52 Currently, CPS does not have a formally established quality assurance committee to oversee and monitor various efforts designed to improve the quality of Agency services. Although CPS supervisory staff conducts monthly case reviews of casework files to determine levels of compliance with applicable OAC rules and in-house policies and procedures, the review process is not conducted under the direction of a formally established quality assurance committee. Improvement initiatives, like the casework review process and the development of the citizen/client questionnaire, are generally conducted by unit supervisors.

R3.27 CPS should consider establishing a quality assurance committee which would oversee a variety of Agency improvement efforts. The committee make-up should represent a cross-section of the entire Agency, from unit supervisors to front line employees. Various quality assurance and client satisfaction initiatives could be formalized under the auspices of a quality assurance committee, including the following:

- Establish a contract with a local college to assist in developing a comprehensive surveying program to assess customer satisfaction
- Formalize the case record review program under the authority of the committee to alleviate extra responsibility for unit supervisors
- Review non-employee grievances and complaints and provide recommendations for corrective action to management staff
- Conduct interviews with various client groups to assess problem areas with provided services
- Consult other children's services agencies, like LCCS, to seek advice on client satisfaction and quality assurance initiatives

The establishment of such a committee could be developed in conjunction with a strategic plan with responsible parties and an attached plan for implementation. By establishing a committee to regularly assess customer satisfaction and monitor quality assurance initiatives, CPS would be able to better detect Agency weaknesses and improve upon services provided to children and families.



STATE OF OHIO
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