



JIM PETRO
AUDITOR OF STATE

STATE OF OHIO

CLERMONT COUNTY
CHILDREN'S PROTECTIVE SERVICES
PROGRAM OPERATIONS
PERFORMANCE AUDIT

JUNE 7, 2001



STATE OF OHIO
OFFICE OF THE AUDITOR

JIM PETRO, AUDITOR OF STATE

To the Clermont County Commissioners, Mr. David Spinney, interim 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), Program Operations. As a component of Clermont County's long-range performance improvement plan, the County requested a performance audit of four departments which have already implemented Managing for Results and activity based costing. The State Auditor's Office conducted this independent review of CPS's operations with the objective of analyzing the Intake, Ongoing, and Permanency Planning units' responsibilities, staffing levels, and operating costs; the implementation of standard and best practices; and the levels of interagency coordination in relation to peer and best practice agencies. Recommendations provided to County management focused on areas where CPS can improve operational efficiency and service delivery to clients and County residents. This performance audit is the fifth of five performance audits focusing on the four County departments.

The performance audit focused on five core aspects of CPS's operations including staffing and educational levels, intake, ongoing, placement and permanency planning, and unruly and delinquent juveniles. These service and operating areas comprise all aspects of CPS's operations and service delivery areas. The performance audit contains recommendations based on best practices and industry standards for improved Intake, Ongoing and Permanency Planning efficiency, enhanced case management, and increased interagency coordination, 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, and summary of each of the five areas. The executive summary also includes a summary of 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 Office of the State Auditor'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 that reads "Jim Petro". The signature is written in a cursive style and is positioned above the printed name and title.

JIM PETRO
Auditor of State

June 7, 2001

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;
- Permit Central; and
- Child Protective Services, Agency Program Operational Assessment.

The Children's Protective Services, Agency Program Operational Assessment performance audit is the fifth of five performance audit sections to be released. Planning for the Children's Protective Services (CPS), Agency Program Operational Assessment performance audit began in June 2000, and the actual performance audit was conducted primarily during the months of July through November 2000. The performance audit compares CPS to standard child welfare benchmarks, peer agencies and best practices in the specified area.

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, conclusions 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 Children's Protective Services contains elements of both an economy and efficiency audit and a program performance audit.

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

- Assess the staffing level, mix and caseloads;
- Analyze CPS caseworker education levels, continuing education and internal and interagency training opportunities;
- Assess Intake, Ongoing, Permanency Planning and Adoption Services units responsibilities and operating costs;
- Review the consistency of referral reports and the use of risk assessments;
- Assess investigation completion time-frame compliance and Agency visitation policy;
- Evaluate the use of automation and technology in case documentation;
- Analyze the quality and consistency of case documentation;
- Evaluate the use of home-based and program alternatives to out-of-home placement;
- Evaluate usage of temporary and permanent custody and analyze the level of placement stability;
- Evaluate post-adoption service levels;
- Evaluate the use of CPS placement by the Juvenile Court; and
- Evaluate interagency cooperation and coordination levels.

Methodology

To complete the performance audit, the auditors gathered and assessed a significant amount of data pertaining to CPS, conducted interviews with various groups associated with CPS and conducted interviews and assessed information from the peer counties and best practice counties. 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

The methodology is further explained below.

Studies, reports and other data sources

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

- Agency reports, policies and planning documents
- Service provider contracts
- CPOE indicator reports
- Public Children's Services Association of Ohio (PCSAO) *Standards for Effective Practice and Fact Book*
- KPMG's activity-based costing report for CPS
- American Humane Association's review of Cuyahoga County Department of Children and Family Services
- State of Illinois, Department of Children and Family Services Performance Contracting Concept Paper
- State of Colorado, Department of Human Services (Division of Child Welfare) Performance Audit
- Auditor of State's Office (AOS) Performance Audits on Montgomery County Children Services Agency and Butler County Children Services Board

Interviews, Discussions and Surveys

Numerous interviews and discussions were held with many levels and groups of individuals involved internally and externally with CPS. These interviews were invaluable in developing an overall understanding of CPS' operations. Examples of the organizations and individuals that were interviewed include the following:

- Clermont County CPS management and staff
- Butler Children's Services management
- Lorain Children's Services management
- Mahoning Children's Services management
- Trumbull Children's Services management
- PCSAO research staff

Benchmark Comparisons with Other Counties

Benchmark comparisons were developed through best practice agencies and like-sized counties including Butler, Lorain, Mahoning and Trumbull counties. The aforementioned counties were selected based on demographic and operational data. Performance indicators were established for the various performance audit areas to develop a mechanism to compare how effectively and efficiently CPS is providing necessary functions. The information was obtained primarily through information requests and interviews held with the appropriate personnel at each county.

Summary Results

The summary results of the performance audit are contained within pages 1-4 through 1-9. A summary of financial implications is included on page 1-10. Major findings, commendations, and recommendations are provided for each area assessed in the performance audit. A thorough analysis of each area, 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, as the performance audit provides a series of ideas which the County and CPS should consider in its decision-making process.

Background: This report focuses on Clermont County's Children's Protective Services which acts as Clermont County's Public Children Services Agency (PCSA). CPS is a division within the County's Department of Job and Family Services (DJFS). Although CPS offers a variety of child welfare services, the Agency is primarily responsible for investigating reports concerning any child alleged to be abused, neglected or dependent. In addition, CPS provides foster care and adoptive services for children who are removed from their homes. In FY 1999, CPS received 1,826 referrals of child abuse or neglect which included 1,597 investigated referrals and 229 investigated requests for information and referrals to other agencies. An additional 662 requests for information and referrals to other agencies were received but did not require investigation. A total of 4,680 children received some form of service from CPS. CPS also served 174 children through temporary foster

care or planned permanent living arrangements. An additional 37 children were in permanent CPS custody and 10 adoptions were finalized by the Agency in FY 1999.

Findings: A summary of the significant findings in the report include the following:

- CPS has the highest supervisor to caseworker ratio of the peer agencies which is 30.8 percent above the peer average. Because caseworkers are cross trained, the Agency could potentially reallocate caseworkers between under and overstaffed areas to meet PCSAO and CWLA guidelines without undue difficulty.
- CPS uses the ODJFS continuing education program to encourage caseworkers to work towards a Masters in Social Work; however, CPS has a low percentage of social workers with master's degrees, either in social work or other fields when compared to the peer or national average. CPS internal and external training exceeds ORC annual requirements and caseworkers receive frequent safety awareness training. Although CPS does not have specialized units or formally designated staff with expertise in areas such as out-of-home abuse, sex abuse, or chemical dependency. A Child Abuse Investigation Team has also been established to coordinate efforts between CPS and other County agencies.
- CPS employee evaluations are conducted on an annual basis by the employee's supervisor. The performance evaluations used by CPS include a rating of the employee's quality of work, dependability and cooperation; a summary of the employee's work performance during the evaluation period; and a detailed record of employee training needs. However, evaluations do not adhere to American Human Association (AHA) standards.
- CPS's investigations as a percentage of the child population is above the peer average, and cases investigated as a percentage of referrals is the highest of the peers and 12.3 percent above the peer average. CPS's average cost per investigation is the second lowest of the peers which reflects cost efficiencies attained through reduced overtime usage and lower staffing levels in the Intake Unit.
- CPS screeners are not trained or authorized to make risk determinations. Instead, Intake supervisors determine risk levels and assign cases within the Intake unit. Referrals are generally recorded manually by screeners, although computerized forms are available. CPS has not developed a formal policy with subsequent procedures to ensure consistent referral documentation. Also, CPS screeners do not use a database to document the identity of referents, nor do they monitor the number of referrals made from each referral source.
- CPS uses a rotating on-call schedule to ensure caseworker availability for process and screen referrals made after hours. Although additional costs are incurred for staff overtime, the costs are lower than those to maintain 24-hour staffing.

- CPS Intake caseworkers use the ODJFS risk assessment field guide to limit the amount of subjectivity in assessments. A sample of 10 Intake investigation reports showed that investigation reports and risk assessments were completed for each, but safety plans were completed for only two cases.
- CPS and Trumbull County's PCSA were the only agencies with 100.0 percent initiation of emergency investigations within the State-mandated one-hour time line. CPS completed 77.8 percent of investigations and risk assessments within the 30-day time line and 95.1 percent of investigations within 45 days.
- CPS's Ongoing caseload is within the range of Child Welfare League of America's (CWLA) recommended caseload ratios. The Ongoing Unit spends the majority of its costs and labor hours in family intervention activities.
- CPS does not use a formal case-weighting system to determine and delegate appropriate levels of caseloads to each caseworker. Instead, caseloads are assigned by school district. CPS minimum care levels stipulate visitation frequency above State requirements. Also, CPS has developed a formal non-custody case review process that mirrors the SAR process.
- The Ongoing Unit does not use fully automated processes for risk assessments, placement reports, case file documentation or records retention. The case closure process is also manual as a result of CPS' long case life when compared to the peers.
- CPS develops case plans according to the specific client and family needs identified in the Risk Assessment Model. A review of case plans showed the 94 percent of CPS case files contained CWLA's seven quality indicators. Family involvement was also identified in a large majority of cases.
- CPS has not developed extensive in-home programs and has not implemented a Family Preservation Program. However, the Agency has invested in three primary home-based services that teach parenting and life skills.
- A small percentage of children are maintained in CPS custody. CPS achieves a higher rate of custody terminations by reunification than its peers and places an emphasis on using relative placements and adoptions to achieve permanency.
- CPS's foster care placement costs are higher than the peers due to frequent use of private network providers and high residential treatment costs. CPS's cost per finalized adoption is also higher than the peers. CPS does not utilize private adoption placement services.

- CPS maintains fewer County-administered foster homes per capita than the peers. CPS may have difficulty recruiting eligible foster homes due to low per diem rates for normal County-administered foster care; however, once recruited, County foster parents benefit from a wide array of CPS services. CPS allocates few resources to recruitment activities and does not have a formal strategy for recruitment.
- CPS placements of unruly and delinquent juveniles are reduced through Clermont County Juvenile Court's diversion programs. In FY 1999, 993 youth participated in diversion services and 81.8 percent successfully completed the program. Placement costs for juvenile delinquents and unruly children, referred by Juvenile Court, represent 41.8 percent of CPS's total placement costs for FY 1999.

Commendations: A summary of the significant commendations in this report include the following:

- CPS provides sufficient and specific training opportunities for employees which, in many cases, exceed the ORC requirements of at least 90 hours for first-year employees and 36 hours for non first-year employees. Also, the training that CPS caseworkers and local police officers attend together helps in developing a common reference for the protection of children and the investigation of child abuse and neglect.
- The Intake Unit's current practice regarding the investigation of referrals appears to function at a level consistent with the needs of the community. By investigating 100 percent of referrals, CPS surpasses the peers in initially assessing the various service needs of its client population.
- CPS's cost per investigation is the second lowest of the peers and \$156 less than the peer average, indicating that efficient procedures are in place for initial investigations of child abuse and/or neglect referrals.
- CPS has developed a cost effective and efficient process for receiving child abuse and neglect reports 24 hours a day, 7 days a week. The on-call rotation method allows CPS to remain compliant with ODJFS guidelines for the initiation of emergency referrals.
- The implementation of safety awareness training within CPS ensures that caseworkers can learn personal safety and de-escalation techniques to reduce the likelihood of encountering violence on the job.
- The Child Abuse Investigative Team circulates information among community agencies working for the protection of Clermont County children and increases cooperation in providing child welfare services. Involving all County agencies responsible for child protection and encouraging an open-line of communication reduces the duplication of services and increases the development of creative and effective methods of service delivery.

- CPS retains a low percentage of children in Agency permanent custody indicating a strong agency focus on permanent living arrangements for children. Although there is some increased risk in high levels of reunification, caseworker intervention and intensive family assistance increases the likelihood of successful parental reunification.
- CPS provides a wide array of support services to its County-administered foster homes. CPS's initiative to reimburse 100 percent of day care costs should help increase and retain the number of County-administered foster care homes.
- Clermont County's diversion programs successfully reduce the number of children entering the court system or being placed in out-of-home care through CPS.

Recommendations: A summary of the significant recommendations include the following:

- Because CPS caseworkers are cross-trained in all functional areas, CPS should be able to provide staffing levels consistent with PCSAO and CWLA guidelines in all areas without increasing the number of caseworkers. CPS should also evaluate the division of functions between caseworkers and case aids to determine which administrative duties can be shifted to case aids.
- CPS should encourage its staff members to continue their education in social work or related fields by providing additional incentives. CPS should require all caseworkers to attend safety awareness training and refresher courses on a biannual basis. Also, a formal cross-training program should be developed between CPS and local law enforcement personnel.
- CPS should consider using AHA standards to develop effective performance measures for employee evaluations which would establish a direct link between evaluation criteria and employee job descriptions.
- CPS should consider reorganizing the screening process to allow the social service workers to make determinations and assign priority ratings on referrals. Also, CPS should provide specialized training to its screeners to ensure that they properly obtain and record all information applicable to the case during the referral and screening process. CPS should also create a computerized database for referral information, as well as information and referral calls, and should consider maintaining case documentation in a database or in case management software.
- CPS should establish clear criteria and specific policies regarding the types of case situations accepted for investigation and expedited as emergency situations. Safety planing should also be incorporated as a regular part of all investigations in which children are found to be at moderate or high risk of harm.

- CPS should consider enhancing its service delivery and expertise by developing formal caseworker designations and specializations.
- CPS should attempt to expedite the investigation process to meet the CWLA recommended benchmark of 30 days. CPS should only use the 45-day extension in the most extreme cases or when absolutely necessary.
- CPS should establish a formal case-weighting system to use when assigning cases to Ongoing caseworkers. Also, CPS should consider expanding the Agency's minimum visitation policy to include a greater number of visits within and outside of the home environment. CPS should develop a standardized, automated system to track and monitor the type and frequency of contacts made with families and case principals.
- CPS should consider increasing Ongoing expenditures on a short-term basis to implement additional intervention programs that reduce the likelihood of placement, such as in-home services and Family Preservation Programs.
- CPS should continue to expand the use of County-administered homes and reduce reliance on private network providers. Resources should be redirected from private providers to increase the per diem rate for County-administered homes and to provide alternative in-home treatment programs in County-administered homes. Additionally, CPS should develop cooperative relationships with surrounding counties to increase their negotiating power by combining programmatic contracts.
- CPS should increase the number of County-administered foster parents by adopting a formal recruitment strategy and increasing per diem rates.
- CPS should conduct an in-house study to determine the feasibility and cost of using private adoption placement services. Also, CPS should follow CPOE recommendations to enhance its post adoptive services and subsidies.
- CPS and the Juvenile Court should consider creating additional diversion programs to improve the coordination of delinquency services among the County's social services departments and the Juvenile Court and maximize interagency resources by creating alternatives to CPS residential placement. CPS and the Clermont County Juvenile Court should develop programs to provide specialized services to juvenile offenders previously referred to CPS placements. If court-based programs to maximize third-party and Medicaid funding were fully utilized within Clermont County, the overall cost to the County for unruly and delinquent juvenile services could be reduced.

Financial Implications Summary

The following table summarizes the total estimated savings and implementation costs for the recommendations in this section of the report. For the purpose of this table, only recommendations with quantifiable financial impacts are listed.

Summary of Financial Implications

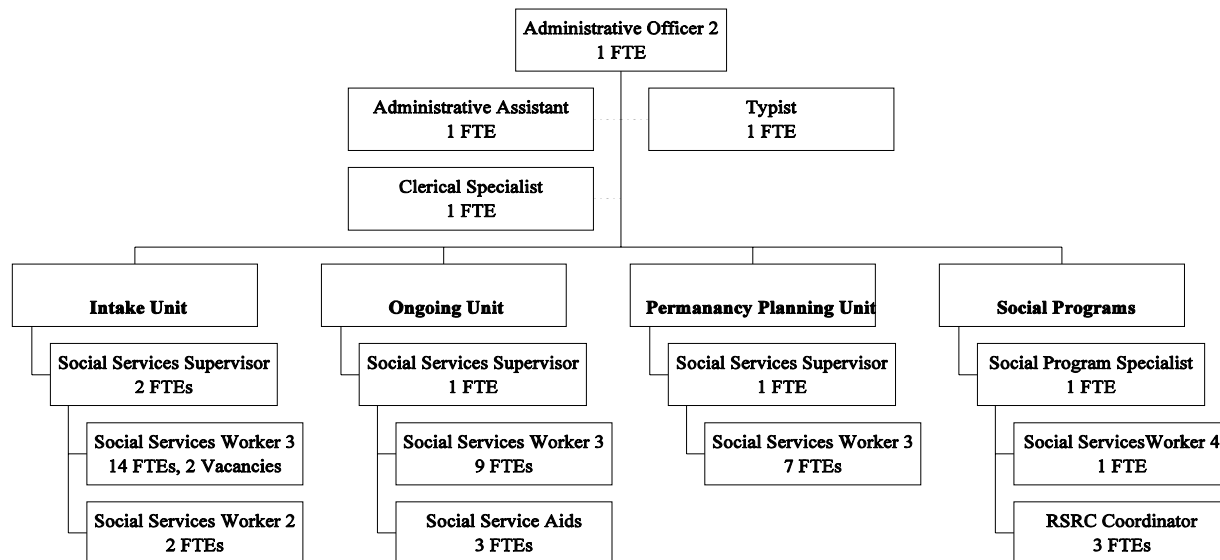
Recommendation	Estimated Annual Cost Savings	One-time Implementation Costs	Annual Implementation Costs
R3.3 Provide full tuition reimbursement cost to staff members to complete Master's degree requirements.			\$91,000
R4.1 Upgrade two social service worker IIs to social service worker IIIs to increase the decision making responsibility of the screener positions			\$7,200
R4.2 Implement investigative training courses for screeners		\$900	
R4.9 Purchase 27 laptops for Intake and Ongoing caseworkers with communications modules and network security software.		\$57,900	
R5.11 Implement a family preservation program and reduced placements by 7.5 percent.	\$204,000		
R6.1 Reduce the cost per placement for residential treatment to levels similar to the peer average.	\$816,000		
R6.2 Reduce the cost per private network foster care placement to levels similar to the peer average.	\$531,000		
R6.3 Reduce the cost per adoption to the peer average cost of \$4,000 per private adoption.	\$70,000		
R6.5 Shift an additional 40.0 percent of children in placements to County-administered foster care.	\$1,100,000		
R7.3 Reduced CPS placements of unruly and delinquent juveniles and fully utilized third-party funding sources for out-of-home placements.	\$750,000		
Total	\$3,471,000	\$58,800	\$98,200

Background

At the request of the Clermont County administration, the Auditor of State’s Office has undertaken this performance audit to assess the programmatic operations of Clermont County Children’s Protective Services (CPS). This report is the second of two performance audits of Clermont County Children’s Protective Services.

CPS is one of five divisions within the Clermont County Department of Job and Family Services (DJFS). The Agency consists of 50 full-time equivalents (FTEs). **Chart 2-1** provides an overview of CPS’s organizational structure and staffing levels. All positions are shown as FTEs.

**Chart 2-1: Clermont County Department of Job and Family Services
Children’s Protective Services, June 2000**



Source: CPS organizational chart

Organizational Function

Certain public social services program in Ohio are supervised by the State and administered by county Public Children Services Agencies (PCSA). These agencies were created under Ohio Revised Code (ORC) § 5153.03 which states that each county must have a PCSA as part of a children services board or county department of job and family services. ORC § 5153.16 requires the PCSA to represent the interests of children in need of public care or protection through the following activities:

- Investigating reports concerning any child alleged to be abused, neglected or dependent;
- 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 services to any unwed girl or woman who is pregnant with or has delivered a child;
- Providing emergency and substitute care for children who are removed from their homes;
- Locating family foster homes and adoptive homes; and
- Offering adoption services, which include subsidized adoption.

Clermont County Children's Protective Services serves as the County's PCSA and is a part of the Clermont County Department of Job and Family Services. CPS's operations are subject to various guidelines and procedures contained in the ORC and Ohio Administrative Code (OAC), as well as regulations established by the Ohio Department of Job and Family Services (ODJFS). CPS's key mandated child protection responsibilities, pursuant to the various State guidelines, are as follows:

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

Staffing

Table 2-1 presents staffing level information by functional classification for CPS as of June 2000. The number of staff is calculated using FTEs as applied to the individuals' responsibilities.

Table 2-1: CPS Staffing Levels by Classification

Area	Classification	FTEs	Vacancies
Administration	Administrative Officer	1	0
Intake	Intake Supervisors	2	0
	Screeners	2	0
	Intake Social Services Workers	14	2
Ongoing	Ongoing Supervisors	1	0
	Ongoing Social Services Workers	11	0
	Ongoing Unit Social Services Aids	3	0
Permanency Planning Unit (Long-term Foster Care and Adoption)	Permanency Planning Supervisor	1	0
	Permanency Planning Social Services Workers	7	0
Social Programs	Social Program Specialist	1	0
	Social Service Worker	1	0
	RSRC Coordinator	3	0
Subtotal	Administration and Social Services Staff	47	2
Support Staff	Administrative Assistant	1	0
	Typist	1	0
	Clerical Specialist	1	0
Total	Agency Staff	50	2

Source: CPS Personnel Records

CPS directs the largest portion of its human resources to the Intake Unit with 36.0 percent of CPS's total personnel. The Ongoing and Permanency Planning Units represent the next greatest concentrations of personnel with 30.0 and 16.0 percent respectively. Support staff and administrators make up the smallest categories of employees at 6.0 and 2.0 percent respectively, indicating a concentration of personnel in CPS functional areas.

Summary of Operations

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

- Screening and Intake investigations;
- Ongoing services including visitations, counseling and diagnostic services;
- Substitute care (foster care); and
- Adoption services.

All reports of child abuse, neglect or dependency are initially routed to screeners within the Intake Unit. Upon receipt of a referral, CPS determines if information provided by the referent constitutes a report of alleged child abuse or neglect and determines 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 are assured that information provided to CPS will be kept confidential, unless it is in the best interests of the child to disclose the information. In FY 1999, CPS received 1,826 referrals of child abuse or neglect which included 1,597 investigated referrals and 229 investigated information and referrals. An additional 662 information and referrals were received but did not require investigation. A total of 4,680 children received some form of service from CPS.

Intake supervisors receive referrals from screeners, determine the urgency of the referral and assign the case to an Intake Unit caseworker. Caseworkers investigate the allegations, and based on their findings, the Intake Unit supervisor determines the origin, type and extent of risk to the child in accordance with OAC requirements. Intake workers establish contact with case principles to complete risk assessments regarding the safety of alleged child victims. Time frames for implementing the Ohio Family Risk Assessment Model and procedures for developing the safety plan are described in the OAC. In FY 1999, CPS performed 1,597 investigations of child abuse and neglect involving 3,774 children. An additional 229 cases were classified as information and referrals where no abuse or neglect was identified but the caller required some form of assistance. Two-hundred and forty-nine investigated reports were substantiated as instances of child abuse or neglect, while 268 were indicated as abuse or neglect but the investigation process did not yield sufficient proof of neglect or abuse to transfer the case to the Ongoing Unit. During the same year, 1,080 investigated reports were found to be unsubstantiated cases of child abuse or neglect.

When a report of child abuse or neglect is substantiated, Intake and Ongoing Unit caseworkers complete case plans for services. The Ongoing Unit monitors client progress and the achievement of case plan goals. The Ongoing Unit also conducts Semi-annual Administrative Reviews (SAR) for cases requiring in-home services or out-of-home placements. Procedural requirements for case plans and SARs are found in the OAC. In FY 1999, the Ongoing Unit managed 245 cases serving approximately 530 children. The caseload was approximately 14 cases per caseworker. The social services aides provide transportation services to children receiving Ongoing Unit services, such as

medical treatment and counseling. CPS social services aides transported children on 3,414 separate occasions and supervised 140 family visits during FY 1999.

CPS also contracts for counseling and diagnostic services used in emergency and Ongoing services. Clients may be referred to contracted providers to receive in-home services, diagnostic and psychiatric assessments, or therapy depending on the case plan. Pursuant to OAC §5101:2-39-50, CPS cooperates with other organizations to coordinate optimal service delivery to children and families in Clermont County.

During the investigation phase or Ongoing care, CPS has the authority to file for custody and remove the child from the home. 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. Placement is only considered after all other efforts fail to ensure the child's protection. Permanency planning is based upon the needs of the child and encompasses the goal of reuniting the family as soon as possible or providing an alternative permanent placement for the child, which can include adoptive placements. During FY 1999, CPS placed approximately 311 children in some form of substitute care. Two-hundred and eleven children were in CPS's custody on December 31, 1999.

The three possible legal designations associated with placement and CPS custody include the following:

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

CPS served 174 children through temporary foster care or planned permanent living arrangements during FY 1999. An additional 37 children were in permanent CPS custody.

The Clermont County Prosecutor's Office works as CPS's counsel in cases heard before the Clermont County Juvenile Court, providing CPS with legal counsel on cases and filing all cases on behalf of CPS, including custody and non-custody case filings. The Prosecutor's Office also handles all case appeals associated with CPS.

Adoption services are used to secure and maintain permanent homes for children in CPS's permanent custody. OAC §5101:2-48-05 sets forth adoption procedures for PCSAs. Under the AdoptOhio Plan, CPS's Permanency Planning Unit collaborates with other agencies, both public and private, to find permanent homes for children whose permanency plans do not involve reunification or long-term foster care. Ten adoptions were finalized during FY 1999.

Financial Data

Table 2-2 illustrates a comparison of expenditures among the major functional areas shared by CPS and the peer agencies in Butler, Lorain and Mahoning Counties.

Table 2-2: FY 1999 Expenditures by Function

Expenditures	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average
Intake Unit					
Salaries and Benefits	\$546,318	\$1,194,213	\$851,310	\$1,102,978	\$923,705
Other	\$425,576	\$398,253	\$957,543	\$637,474	\$604,712
Total Intake	\$971,894	\$1,592,466	\$1,808,853	\$1,740,452	\$1,528,416
Percent of CPS Budget	16%	11%	42%	21%	23%
Number of Investigations	1,539	2,379	1,168	1,017	1,526
Cost per Investigation	\$632	\$669	\$1,549	\$1,711	\$1,140
Ongoing Unit					
Salaries and Benefits	\$734,660	\$1,389,655	\$1,402,743	\$1,090,688	\$1,154,437
Other	\$414,750	\$412,994	\$1,075,940	\$644,449	\$637,033
Total	\$1,149,410	\$1,802,649	\$2,478,683	\$1,735,137	\$1,791,470
Percent of CPS Budget	19%	12%	58%	21%	28%
Children Served FY 1999	530	1,020	522	619	673
Average Cost per Child	\$2,169	\$1,767	\$4,748	\$2,803	\$2,872
Permanency Planning Unit (Foster Care)					
Salaries and Benefits	\$106,779	\$476,437	N/A ¹	\$1,355,623	\$646,280
All Placement Costs	\$3,681,540	\$8,985,894	N/A	\$1,392,601	\$4,686,678
Other	\$37,537	\$852,679	N/A	\$667,814	\$519,343
Total	\$3,825,856	\$10,315,010	N/A	\$3,416,038	\$5,852,301
Percent of CPS Budget	63%	70%	N/A	42%	58%
Number of Placements	356	915	N/A	381	551
Average Cost Per Placement	\$10,747	\$11,273	N/A	\$8,966	\$10,329
Permanency Planning Unit (Adoption)					
Salaries and Benefits	\$81,779	\$301,060	N/A ¹	\$313,664	\$232,168
Adoption Costs	\$8,257	\$326,040	N/A	\$438,661	\$257,653
Other	\$42,483	\$370,238	N/A	\$571,651	\$328,124
Total	\$132,519	\$997,338	N/A	\$1,323,976	\$817,944
Percent of CPS Budget	2%	7%	N/A	16%	8%
Number of Finalized Adoptions	10	65	N/A	38	38
Cost of Each Adoption	\$13,252	\$15,344	N/A	\$34,841	\$21,146
Total Expenditures	\$6,079,679 ²	\$14,707,463	\$4,287,536	\$8,215,603	\$8,322,570

Source: Agencies' records

¹ Lorain County's adoption and foster care units are one combined unit and are not shown here.

² Total expenditures do not include adult protective services programs shown in **Table 2-4**. Miscellaneous overhead costs, identified through activity based costing but not attributed to a programmatic function, are also not included (see also **Table 2-3**).

CPS has the lowest cost per investigation per adoption. Also, CPS has the second lowest cost per child for Ongoing care. However, foster care costs per child are the second highest and approximately equal to the peer average. Salary costs are below the peers in all areas. When comparing the number of children served, CPS serves the lowest number of children through the Intake and Permanency Planning Units, and the second lowest in the Ongoing Unit.

Table 2-3 shows CPS expenditures for FYs 1998, 1999 and FY 2000 budget.

Table 2-3: CPS Expenditures by Category, Three Year History

	FY 1998 Actual	FY 1999 Actual ¹	Percent Change	FY 2000 Actual	Percent Change
Salaries	\$1,368,674	\$1,365,848	(0.21)%	\$1,373,409	0.55%
Fringe Benefits	\$351,474	\$380,638	8.30%	\$368,353	(3.23)%
Purchased Services	\$3,996,154	\$3,798,786	(4.94)%	\$4,605,733	21.24%
Materials/ Supplies	\$0	\$0	N/A	\$1,928	N/A
Operating Transfers Out To Public Assistance Fund ²	\$1,601,078	\$800,000	(50.03)%	\$574,271	(28.22)%
Total	\$7,317,380	\$6,345,272	(13.28)%	\$6,991,592	10.19%

Source: Agency budgets FY 1998, 1999 and projected budget for 2000

¹ FY 1999 actual salaries and benefits encompassed 27 pay periods and have been adjusted to reflect the typical 26 pay periods shown in FY 1998 and FY 2000. FY 1999 unadjusted actuals were as follows: salaries, \$1,418,381; benefits, \$395,278; total, \$6,412,445.

² The Public Assistance Fund is used to pay shared costs for facilities, fixed assets and administrative support.

Significant variances in **Table 2-3** are discussed below.

- *An increase in fringe benefits for FY 1999 and a decrease in FY 2000:* Increases in health insurance costs and workers compensation contributed to the increase in fringe benefits for FY 1999. The FY 2000 budget projection shows a decrease due to changes in staffing levels.
- *An increase in purchased services for FY 2000:* The increase in purchased services is due to increased costs for certain types of foster care placements.
- *An increase in materials and supplies for FY 2000:* The increase in materials and supplies for the FY 2000 budget was the result of planned advertizing expenditures for National Child Abuse and Neglect Prevention Month.

Table 2-4 summarizes CPS's expenditures according to activity-based costing (ABC) reports during FY 1999.

Table 2-4: FY 1999 Activity-Based Costing, CPS

	Family Interaction	Court Related	Risk Assessment	Documentation	Adoption	Information and Referral	Adult Protective Services	Foster Care	Total by Category
Personnel Costs	\$535,202	\$56,465	\$686,430	\$285,937	\$81,779	\$34,114	\$52,048	\$106,779	\$1,838,754
Purchased Services	\$49,285	\$4,381	\$10,654	\$17,856	\$8,257	\$524	\$668	\$3,682,226	\$3,773,851
Other Costs	\$127,741	\$13,717	\$166,284	\$68,683	\$18,323	\$8,227	\$10,508	\$14,098	\$427,581
Vehicle Costs	\$14,602	\$0	\$19,007	\$0	\$2,094	\$1,201	\$0	\$1,354	\$38,258
Materials	\$10,355	\$1,112	\$13,479	\$5,567	\$1,485	\$667	\$852	\$1,142	\$34,659
Utilities Costs	\$7,031	\$755	\$9,153	\$3,781	\$1,009	\$453	\$578	\$776	\$23,536
Maintenance Costs	\$2,724	\$292	\$3,546	\$1,464	\$391	\$175	\$224	\$300	\$9,116
Total by Function	\$746,940	\$76,722	\$908,553	\$383,288	\$113,338	\$45,361	\$66,080	\$3,806,675	\$6,145,755
Unit Measure	Per Visit	Per Hearing	Per Investigation	Per Labor Hour	Per Finalized Adoption	Per Contact	Per Investigation	N/A ¹	N/A
Cost Per Unit	\$131.04	\$123.55	\$568.91	\$49.63	\$11,333.82	\$192.84	\$504.42	N/A ¹	N/A

Source: CPS ABC report

¹ ABC measures for Foster care are divided into the five categories shown in **Table 2-5**

The largest expenditure group is purchased services which includes approximately \$3.7 million (61.4 percent) in foster care placement costs. Personnel costs represent the next largest cost category at 29.9 percent of total expenditures. Foster care represents the highest costs on a functional basis with risk assessment and family interaction a distant second and third respectively. When compared on a per unit basis, adoption activities have the highest expenditure per unit due to the small number of adoptions completed in FY 1999. However, **Table 2-5** shows the cost of foster care placements is actually higher than finalized adoptions when foster care is examined on a care-type basis.

Table 2-5: FY 1999 Foster Care Costs by Category

	Foster Care Training	Foster Care Home Study	Foster Care Recruiting	Foster Care Certification	Foster Care Placement
Unit Measure	Per Training Hour	Per Home Study Completed	Per Labor Hour	Per Certification Completed	Per Placement
Cost Per Unit	\$173.96	\$109.44	\$79.25	\$2,232.36	\$11,931.52

Source: CPS ABC analysis

Placement and certification activities were the largest per unit expenditure categories for foster care. Recruiting activities for County-administered foster parents had the lowest expenditure per unit. Finally, training and home study costs are low because they are performed in-house and are used less frequently than placement and certification services.

Key Statistics

PCSAs are directly impacted by population size, the range of supplemental program services and mandates associated with the provision of services. **Table 2-6** shows the social and economic characteristics of Clermont County and the peers as they relate to children services. In most instances, the size of population and number of families positively corresponds to the PCSA's caseload.

Table 2-6: Peer Demographics

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Total Population	169,670	291,479	271,126	264,806	227,069	244,830
Total Two Parent Families	78,048	77,931	72,947	72,646	84,016	77,118
Children in Population	45,811	81,439	78,878	68,486	56,767	66,276
Number of Children Served	3,774	5,471	N/A	7,011	4,605	5,442
Children Served as a Percent of County Population	8.2%	6.7%	N/A	10.2%	8.1%	8.8%

Source: PCSAO Factbook 1999-2000 (data for year ending December 31, 1998)

Clermont has the lowest population of the peer counties and serves the second lowest population of children among the peer agencies. However, Clermont and Mahoning Counties' PCSAs serve the highest percentage of children when examined as a percentage of total child population. The high percentage served indicates that CPS may maintain a higher workload than the peer agencies. Also, a higher percentage of children served does not necessarily indicate a higher rate of abuse or placement, but may reflect CPS providing services to children who are not victims of abuse or neglect or who, through the investigation process, are referred to other agencies for services.

Table 2-7 shows FY 1999 expenditures per child served by CPS and the peer agencies.

Table 2-7: FY 1999 Expenditures Per Children Served

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
FY 1999 Expenditures	\$6,079,679	\$14,707,463	\$9,244,862	\$8,215,603	\$7,460,047	\$9,141,531
FY 1999 Expenditures Per Child Served	\$1,611	\$2,688	N/A	\$1,172	\$1,620	\$1,773

Source: Agency records

CPS has the lowest FY 1999 expenditures as a result of the smaller number of children served when compared to the peers. CPS also has the second lowest expenditures per child served which can be attributed to lower salaries and fewer staff members within the Agency.

An evaluation of certain areas of CPS operations is contained in the following sections:

- Staffing;
- Intake;
- Ongoing;
- Permanency Planning; and
- Unruly and Delinquent Juveniles.

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Staffing

Performance Measures

The following list of performance measures were used to analyze the staffing levels and mix of Clermont County Children's Protective Services program operations:

- Assess the staffing level and mix
- Evaluate the caseload per casework
- Analyze CPS caseworker education levels and continuing education
- Review CPS evaluation processes
- Assess the utilization of exit interviews

Findings/Commendations/Recommendations

Staffing, Caseload and Human Resource Management

F3.1 **Table 3-1** compares CPS staffing levels to the peer agencies by classification. All positions are shown as full-time equivalents (FTEs).

Table 3-1: Comparison of Staffing of CPS to Peer Agencies

	Clermont County		Butler County		Lorain County		Mahoning County		Trumbull County		Peer Average	
	#	%	#	%	#	%	#	%	#	%	#	%
Administration	1	2.0%	2	1.5%	5	4.4%	3	2.4%	4	2.5%	3.0	2.6%
Social Worker Supervisors	4	8.0%	13.2	10.1%	12	10.6%	13	10.2%	17	10.5%	11.8	10.1%
Social Program Staff	5	10.0%	10	7.6%	9	7.9%	5	3.9%	10	6.2%	7.8	6.7%
Caseworkers	37	74.0%	85	64.8%	65	57.3%	85.2	67.1%	97.1	59.9%	73.9	63.3%
Support Staff	3	6.0%	21	16.0%	22.5	19.8%	20.7	16.3%	34	21.0%	20.2	17.3%
Total	50	100%	131.2	100%	113.5	100%	126.9	100%	162.1	100%	116.7	100%
Children Served Per Employee	75.5		64.4		N/A		82.3		47.4		67.4	
Children Served per Caseworker	102.0		85.0		N/A		85.2		97.1		92.3	

Source: Agencies’ records

CPS has the highest percentage of staff dedicated to direct service functions, such as casework and social programs, when compared to the peer agencies. CPS caseworker staff (74.0 percent of total staff) is approximately 14.5 percent higher than the peer average (63.3 percent). Likewise, social program staff is approximately 33.0 percent higher than the peer average. Also, CPS has the second lowest percentage of administrative staff when compared to the peers and support staff is approximately 88.3 percent below the peer average. Focusing agency resources on direct service delivery helps CPS serve a larger number of children than similar agencies. When the ratio of children served per employee is compared between CPS and the peers, CPS serves 38.2 percent more children than the peer average and 26.8 percent more than the next highest peer. Finally, CPS serves the highest number of children per caseworker, although caseloads may be above recommended levels in some areas (see **Table 3-3**).

F3.2 **Table 3-2** compares supervisor to caseworker ratios at CPS and the peer counties. The Child Welfare League of America's (CWLA) recommended supervisor to staff ratio is included as an industry benchmark.

Table 3-2: Supervisor to Caseworker Ratios

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average	CWLA Recommendation
Number of Supervisors	4.0	13.2	12.0	13.0	17.0	11.8	N/A
Number of Caseworkers	34.0	85.0	65.0	85.0	97.1	73.2	N/A
Supervisor to Caseworkers Ratio	1:8.5	1:6.4	1:5.4	1:6.5	1:5.7	1:6.5	1:5

Source: Agency records

CPS has the highest supervisor to caseworker ratio of the peer agencies which is 30.8 percent above the peer average. Additionally, CPS's supervisor to caseworker ratio is 70.0 percent above CWLA's recommended ratio. CPS supervisors are responsible for monitoring the quality of services provided to the community, especially during the Intake process. An excessively large span of control may hinder supervisors' ability to address all caseworker needs and effectively oversee unit operations (see **R3.1**).

F3.3 **Table 3-3** compares average caseload size for CPS and the peers, and includes Public Children's Services Association of Ohio (PCSAO) recommended caseload ratios.

Table 3-3: Caseload Size Per Caseworker

Type of Worker	Clermont Caseload	Butler Caseload	Lorain Caseload	Mahoning Caseload	Trumbull Caseload	Peer Average	PCSAO Recommended Caseload	CWLA Recommended Caseload
Intake/ Investigation	15.0	14.5	7.8	13.0	23.0	14.7	11 active cases	12 active cases
Ongoing	15.0	14.5	11.8	14.5	14.5	14.1	15 active cases	17 active cases
Permanency Planning	14.0	15.0	N/A ¹	8.0	N/A ²	12.3	15 children	12 to 15 children
Family Preservation	N/A ¹	3.0	N/A ¹	16.0	N/A ²	9.5	15 families	15 families
Independent Living	15.0	10.0	N/A ¹	16.0	N/A ²	13.7	20 children	15 to 20 children
In-home Aids	N/A ¹	N/A ¹	N/A ¹	7.0	N/A ²	7.0	8 families	8 families

Source: Agency personnel records

¹ These caseworkers do not carry caseloads

² Trumbull County was unable to provide this information

CPS caseloads in the Ongoing and Permanency Planning units meet PCSAO guidelines. However, in Independent Living, caseworker carry caseloads below recommended levels while Intake workers manage caseloads above recommended guidelines. These differences may indicate that staff is not appropriately allocated between functional areas. According to CPS, caseworkers are cross-trained in all functional areas but are not typically assigned to cases outside their functional area. CPS could potentially reallocate caseworkers between under and overstaffed areas to meet PCSAO and CWLA guidelines in all areas.

R3.1 CPS should reallocate staff between functional areas to meet PCSAO and CWLA guidelines. Because CPS caseworkers are cross-trained in all functional areas, CPS should be able to provide adequate levels of staffing in all areas without increasing the number of caseworkers. Also, CPS should conduct an internal job audit to determine the level of resources needed for different kinds of cases. In conjunction with time tracking, CPS should examine varying case distribution systems and organizational arrangements to determine the most effective manner in which to allocate staff resources and cases. Additionally, assessing the allocation of duties between caseworkers and case aids as discussed in **R3.2** could help CPS determine appropriate caseload levels and division of duties.

F3.4 CPS uses case aids to assist Ongoing Unit caseworkers in administrative duties. Case aids are often used by PCSAs to ensure communication between the PCSA and service providers, monitor State mandated case review time frames, and provide transportation services to clients and their families. The use of case aids allows caseworkers to direct more time and attention to service delivery to CPS clients. By performing many of the necessary administrative functions of a case, case aids can reduce the time commitments of caseworkers to clerical tasks, freeing up more time for client interaction.

R3.2 Pursuant to the reallocation of staff, CPS should evaluate the division of functions between caseworkers and case aids to which administrative duties can be shifted to case aids. If it is determined that case aids could possibly absorb additional administrative duties, the job descriptions of case aids and caseworkers should be changed to reflect this shift of responsibilities. Case aids could monitor cases, connect families to services and maintain communication with other human service agencies providing services. Effective use of case aids would provide CPS caseworkers with additional time to direct to family services and client needs.

F3.5 The National Association of Social Workers (NASW) has developed educational and experience standards for professional social workers. NASW basic education and experience status requires an accredited baccalaureate in social work, while expert and specialized status requires a master’s degree in social work with additional post-master experience in some cases. **Table 3-4** compares the education levels of CPS, the peers and a CWLA national study.

Table 3-4: Social Worker Educational Levels

	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average	CWLA National Study
Bachelor’s in Social Work	29.0%	24.0%	16.0%	33.0%	25.5%	16.0%
Other Bachelor’s Degree	53.0%	68.0%	29.0%	56.0%	51.5%	52.0%
Master’s in Social Work	3.0%	0.0%	49.0%	0.0%	13.0%	12.0%
Other Master’s Degree	3.0%	5.0%	6.0%	11.0%	6.3%	12.0%
No Degree	6.0%	1.0%	0.0%	0.0%	1.8%	3.0%
Other	6.0%	2.0%	0.0%	0.0%	2.0%	5.0%

Source: Agency records

CPS has the second highest percentage of caseworkers with bachelor's degrees in social work and the third highest percentage with other bachelor's degrees. However, CPS has a low percentage of social workers with master's degrees, either in social work or other fields when compared to the peer average and the CWLA survey. Lower educational attainment can often be attributed to an absence of agency educational requirements or educational assistance offered by the agency, as well as poor opportunities for upward mobility or other incentives. Yet, educational attainment is closely tied to employees' decision-making capabilities.

Lorain County Children Services Board has implemented a tuition assistance program that enables caseworkers to obtain their master's degree in social work at no cost. Lorain County implemented this program to increase the staff's education level, which in turn has increased the level of specialized services Lorain County CSB can offer to the community. In FY 1999, Lorain County spent approximately \$114,000 in tuition payments, or \$5,700 per employee participating in the program.

Clermont County has a county-wide continuing education program which is used by CPS. Several caseworkers are enrolled in the program and working toward the achievement of a Masters in Social Work. The program allows CPS staff to use a flexible schedule to accommodate classes. However, the program does not offer 100 percent reimbursement.

R3.3 CPS should encourage its staff members to continue their education in social work or related fields. This could be accomplished by upgrading the TOPS partial tuition reimbursement incentive program for employees to a 100 percent tuition-reimbursement with the potential addition of salary incentives. CPS should consider implementing a program similar to Lorain County CSB's program to enable caseworkers to obtain their Master's degree in social work at no cost. Assuming a consistent participation rate as Lorain County, Clermont County's cost to provide tuition assistance to 16 employees would be approximately \$91,000 the first year. However, these costs would gradually decrease after the first year as staff members complete degree requirements. These costs would also be offset by the amounts currently invested in the TOPS program.

Financial Implication: CPS's cost to provide tuition assistance to 16 employees would be approximately \$91,000 the first year while gradually decreasing thereafter as staff members complete degree requirements.

F3.6 CPS employee evaluations are conducted on an annual basis by the employee's supervisor. The performance evaluation used by CPS is comprised of three parts which include a rating of the employee's quality of work, dependability and cooperation; a summary of the employee's work performance during the evaluation period; and a detailed record of employee training needs.

Best practice agencies generally use evaluations that are detailed and correlated to each employees' job description. The criteria of an evaluation should also correlate with agency goals and achievement of the agency's mission. The American Human Association (AHA) recommends that performance measures also be included in the evaluation. The performance measures should correlate to agency goals. A sample of CPS evaluations showed a high level of detail and documentation which highlights employee strengths and weaknesses. The current evaluation forms are not, however, tied to employee job descriptions or CPS goals and objectives as outlined in the mission statement. Although most employees believe the current process is fair and adequate, many employees stated that the measurement indicators used in the evaluation are generic and could be enhanced by tailoring them to reflect the requirements and expectations of the job.

R3.4 CPS should modify evaluation forms to establish a direct link between evaluation criteria and employee job descriptions. Additionally, the evaluation criteria and job descriptions should reflect the accomplishment of specific CPS goals and objectives. By including criteria based on job descriptions, CPS can compare an employee's ability to specific position requirements. CPS should also consider using AHA standards to develop effective performance measures for employee evaluations. Performance measurements should reflect the requirements and expectations of the job, including the adequacy and level of detail in case plans, level of family input, responsiveness and ability to use software applications. The use of performance measures that are tied to CPS's mission statement can ensure the accomplishment of overall goals and objectives through specific employee responsibilities.

F3.7 CPS offers in-house orientation/training opportunities and external training. In-house training provided by CPS to new employees includes orientation, weekly supervisor meetings, ODJFS training and job shadowing. Employees are also briefed on new policies and procedures as well as new federal and State mandates during in-house training. A sample of training records showed that new CPS employees received at least 90 hours of training in their first year, which is in compliance with ORC §5153.122.

CPS also offers external training through the South West Ohio Regional Training Center (SWORTC). These classes are provided in specific functional areas of children services, such as adoption, sexual abuse, domestic violence, abuse, neglect and case management. Employees are directed to particular courses based on the evaluation process (see **F3.6**). CPS records indicated that the average amount of training for non-first-year employees was 42 hours annually, which exceeds the ORC requirements of 36 hours.

C3.1 CPS provides sufficient and specific training opportunities for employees, which, in many cases, exceed ORC requirements. Most training assignments are based on areas identified in the evaluation process and CPS addresses each employee's individual professional development needs through the evaluation process.

F3.8 The retention of child welfare workers is a critical issue for PCSAs. Although there is no national standard defining an acceptable level of turnover, the National Child Welfare Resource Center for Organizational Improvement identified 20 percent as an average rate of turnover for agencies that participated in its 1998 study. **Table 3-5** presents CPS's employee turnover rates for the last three years.

Table 3-5: CPS Employee Turnover FYs 1998-2000

Calendar Year	Number of Employee Separations	Average Number of Agency Staff	Percentage of Employee Separations
FY 1998	0	50	0%
FY 1999	8	50	16%
FY 2000 January 1 to June 30	5	50	10%

Source: Agency records

Since FY 1998, CPS has experienced turnover rates at or below Resource Center average findings. According to CPS personnel, the two primary reasons for employee separations were stress and personal reasons.

CPS conducts optional exit interviews that must be requested by the leaving party. The interview is conducted and summarized by the deputy director. The exit interview information is stored in a file and the issues raised during the interview are investigated by the deputy director. According to best practices, employees' feedback should be closely examined for common traits and these traits should be addressed accordingly. Tracking reasons for separation provides management with the opportunity to identify areas of employee dissatisfaction. Although the deputy director reviews each exit interview and discusses the results with unit managers, the reasons for employee separations are not formally tracked by CPS over time or examined for trends.

R3.5 CPS should implement formal programs designed to track and monitor reasons for employee turnover. CPS should standardize the use of exit interviews and use the interviews to discuss reasons for leaving and the positives and negatives of the work experience at CPS. The information obtained in exit interviews should also be tracked in a database to allow trend analysis. This would enable CPS to track its success in reducing employee turnover for specific reasons and identify more employee concerns.

The performance of exit interviews and the compilation of interview data should be coordinated through the Department of Staff Development. More frequent exit interviews could be implemented through the Department of Staff Development without additional costs to CPS.

Intake

Performance Measures

The following list of performance measures were used to analyze the Intake Unit operations of Clermont County Children's Protective Services:

- Assess Intake Unit responsibilities and operating costs;
- Evaluate the screener function;
- Analyze the consistency of referral reports;
- Review the use of risk assessments;
- Assess investigation completion time-frame compliance;
- Evaluate the use of automation and technology in case documentation;
- Assess internal and interagency training opportunities; and
- Evaluate interagency cooperation and coordination levels.

Findings/Commendations/Recommendations

Intake Unit

F4.1 The Intake Unit of Clermont County Children's Protective Services is responsible for investigating allegations of child abuse and neglect and providing services to children and families to reduce the risk of subsequent abuse. Upon receipt of a report of child abuse and neglect, CPS staff members identify the urgency of the report and, when necessary, perform an investigation of the alleged abuse or neglect. **Table 4-1** illustrates operational statistics for CPS's Intake Unit and the peer agencies for FY 1999.

Table 4-1: Peer Comparison of Intake Unit Operational Data

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Number of Referrals	1,826 ¹	3,021 ²	2,117 ²	N/A ³	2,311 ²	2,319
Number of Investigations	1,826 ¹	2,893 ²	1,643 ²	2,004 ²	2,088 ²	2,033
Average Intake Caseload Size	15.0	14.5	7.8	13.0	23.0	14.7
Investigations as a percentage of the Child Population	4.0%	3.6%	2.1%	2.9%	3.7%	3.1%
Cases Investigated as a Percentage of Referrals	100.0% ¹	95.8%	77.6%	N/A ²	90.4%	87.7%

Source: CPS and peer agency records

¹ Includes referrals and investigations for abuse and/or neglect cases as well as information and referral cases.

² Includes referrals and investigations for abuse and/or neglect cases only.

³ Information not available

CPS had the lowest number of referrals which corresponds to the County's population in relation to the peer counties (see **Table 2-6**). CPS also maintains an average Intake caseload that is consistent with the peer average, however CPS's average Intake caseload falls short of PCSAO's recommended level of 12 cases per Intake caseworker (see **R3.2**).

CPS's investigations as a percentage of the child population is above the peer average, and cases investigated as a percentage of referrals is the highest of the peers and 12.3 percent above the peer average. In Clermont County, CPS provides investigations for some information and referral calls. This specific function is not performed by the peers.

C4.1 The Intake Unit's current practice regarding the investigation of referrals appears to function at a level commensurate with the needs of the community. By investigating 100.0 percent of referrals, CPS surpasses the peers in initially assessing the various service needs of its client population. Maintaining this high level of service, helps to ensure the safety and welfare of those referred to CPS.

F4.2 **Table 4-2** shows Intake Unit operational costs for CPS and the peers.

Table 4-2: Peer Comparison of Intake Unit Costs

	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average
FY 1999 Unit Expenditures	\$971,894	\$1,592,466	\$1,808,853	\$1,740,453	\$1,528,417
Average Cost Per Investigation	\$632	\$550	\$1,101	\$868	\$788

Source: Agency records

Note: Data for Butler, Lorain, and Mahoning Counties is from FY 1998.

CPS's average cost per investigation is the second lowest of the peers at 19.8 percent below the peer average. While CPS's overall expenditures are the lowest of the peers, this could be attributed to the small size of Clermont County in relation to the peer counties (see **Table 2-6**). Average cost per investigation is more indicative of operational efficiency. CPS's low cost per investigation reflects cost efficiencies attained through reduced overtime usage and lower staffing levels in the Intake Unit.

C4.2 CPS's cost per investigation is the second lowest of the peers and \$156 less than the peer average. This indicates that CPS has established efficient procedures for the initial investigations of child abuse and/or neglect referrals. Reduced Intake costs also provide CPS with the flexibility to direct resources to other areas of operation.

Referral Screening Operations

F4.3 Reports of child abuse and neglect are documented by CPS screeners and assessed by the Intake supervisors. CPS screeners are classified as social service worker IIs, which are not required to have a four-year college degree in social work or a related field. Because of issues of accountability and responsibility, CPS policy requires screeners to record the information from the referent and hand-deliver the documentation to one of the Intake supervisors for a rating. The Intake supervisor, who has a degree and more extensive social work experience, assigns an Intake caseworker to conduct the investigation, as the social service worker IIs are not trained or authorized to make risk determinations.

Cuyahoga County Department of Children and Family Services (CFS) uses a 24-hour hotline to receive child abuse, neglect and dependency reports. Hotline workers are social service worker IIIs and have the training and educational background to assess if a report is a referral or an information and referral, assign a priority rating to the referrals, and perform investigations after hours and on the weekends. Using social service worker IIIs allows CFS to assign a priority rating and, in emergency reports, initiate the investigation in a quick and expedient manner.

R4.1 CPS should consider reorganizing the screening process to allow the social service workers to make determinations and assign priority ratings on referrals. This would require upgrading the screener positions to social service worker IIIs, which would allow for the autonomous assessment of risk and the ability to assign a priority of emergency or non-emergency to the referral. Allowing social service worker IIIs to perform the screener function will streamline the activity because of their ability to assess child abuse and neglect reports and assign a rating to the referrals.

Financial Implication: The cost to upgrade two social service worker IIs to social service worker IIIs would be approximately \$7,200 in annual salary and benefits. Additional costs may be incurred by the employees or CPS to achieve the appropriate education for the position.

F4.4 Screeners at CPS have not been offered investigative and specialized training to complement their job duties. Because specialized interview training has not been offered, screeners may not have the ability to focus some referrals or obtain needed information from referents. A sample of CPS referrals showed that, in some cases, CPS screeners excluded important information from the referral, such as the severity of abuse, the alleged perpetrator's access to the alleged child victim, the frequency of abuse, the nature of the home environment, socioeconomic factors that might impact the case and the parent-child relationship. Some referrals did not provide complete information for the incident of abuse or neglect. While this information may have been outside the scope of the referent's knowledge, current documents use to record referrals do not provide screeners an opportunity to document knowledge gaps.

According to the Children's Division of the American Humane Association (AHA), the ability to properly interview referents is one of the most critical skills needed by screeners in the children services field. AHA also recommends that screeners have the ability to adapt their interviewing styles depending on whether the interviewee is a mandated referent (therapeutic counselor, doctor, school staff member, human service employee, medical staff member, legal professional, police officer, etc.) or a non-mandated referent (parent, neighbor, family member, witness of child abuse, etc.). The following skills and abilities could also be gained through investigative and specialized training:

- Adapt the interview style to the referent;
- Assess the situation based on the facts provided;
- Determine the appropriate response to ensure the child's safety; and
- Determine the degree of harm to the child and the certainty of evidence.

Because CPS's screeners do not have specialized training, important case facts may not be revealed during the referral and screening process.

R4.2 CPS should provide specialized training to its screeners to ensure that they are equipped with the necessary skills to properly obtain and record all information applicable to the case during the referral and screening process. Specialized training may include cultural competency training and sessions on interviewing diverse groups. Training screeners in investigative interviewing would help CPS maximize the information obtained during initial contacts with referents and clients.

In addition, CPS should modify the screening documents to show all fields of information necessary for a complete referral. In the event that the referent does not have the applicable information, the screener should notate that the information was requested by the referent was unable to provide the necessary data. By notating all questions asked, regardless of the referent's knowledge or ability to fully answer the information request, screeners would be able to better document their participation in the screening process.

Financial Implication: Investigative training courses for screeners would cost CPS approximately \$450 for each employee. The total cost to CPS to train two screeners would be \$900.

F4.5 CPS has not developed a formal policy with subsequent procedures for screeners to use in rating referrals. The lack of a rating and referral policy could also contribute to incomplete reports being filed by screeners, as discussed in **F4.4**. Once the current classification for screeners is upgraded (see **R4.1**), a formal rating and referral policy could ensure that referrals are consistently recorded and rated. Also, the forms used by CPS to document referrals do not include a location for the screener to clarify whether the missing information was a result of limited knowledge on the part of the referent.

R4.3 To assist the screeners in recording and rating referrals, CPS should establish a written policy to standardize this process. A written policy would clarify work steps, ensure consistency and help expedite the screening process. CPS should contact Lorain and Marion County Children Services or Cuyahoga County CFS for examples of various Intake policies.

In developing a formal policy, CPS should outline the information necessary to properly rate and record referrals. In addition, CPS should revise its report template to include key information as outlined in its policy. Depending on the type of case, this information could include the following:

- Alleged perpetrator's access to the child;
- Severity of the abuse and neglect;
- Frequency of abuse and neglect;
- Home environment;
- Socioeconomic factors;
- Parent-child relationship; and
- Level of referent's knowledge of case detail.

Identifying whether the family has a history with CPS could also prove beneficial. A policy determining the nature of information to be obtained, accompanied by updated reporting forms, could be developed at no additional cost to CPS.

F4.6 CPS screeners have the option to use computerized or paper referral forms, although manual forms are preferred by the screeners. Once case data has been collected, a printed version of the form is hand-delivered to the Intake supervisor for approval and rating. Paper copies of referrals, citing incidences of abuse, neglect or dependency, are maintained temporarily to identify subsequent referrals for approximately five years before the files are discarded. The current process used by CPS screeners to record reports of child abuse and neglect, pursuant to OAC §5101:2-34-06, appears to be time-consuming and inefficient.

Case management software, discussed in *Clermont County Children's Protective Services, Policies and Procedures*, provides PCSAs with electronic reports and records. While entering information into the report requires the same time commitment as completing manual forms, effort is not wasted in typing the report a second time. Also, reports can be routed electronically, saving staff time in the review process. Finally, electronic reports do not require as much storage space as paper records.

F4.7 CPS screeners do not use a database to document the identity of the referent when the caller is a mandated reported, and they do not monitor the number of referrals made from each referral source or have the ability to accurately track changes in child abuse and neglect reports. Automated screening records allow the screener to identify cases with repeat referrals. In addition, automated records allow the screener to access stored case data pertaining to the child's family and case history. CPS's current screening method involves considerable manual effort and does not allow screeners to search for past referrals and case history.

R4.4 CPS should create a central computerized referral database for referral information as well as information and referral calls. An automated system would reduce the amount of time and manual effort required to identify cases with repeat referrals. Screeners would have the ability to retrieve all pertinent information for a referral, including case history and family dynamics which would assist the Intake caseworker with the investigation. The database should include the following screens to be completed for information on each case:

- Name, address, telephone number and school information of the alleged child victim;
- Alleged perpetrator's name, address, telephone number and relationship to the alleged child victim;
- Alleged child victim's family dynamics including the parents' names, address(es), home and work telephone number(s), places of employment, occupation and siblings;

- In the case of mandated reporters, the referent's name, address, telephone number, occupation, and relation to the alleged child victim; and
- Information regarding supportive family members or friends of the family.

Additional screens should include information regarding the current allegation of abuse to include but not be limited to the following information:

- Date and time of occurrence;
- Frequency of abuse;
- Location of the occurrence;
- Risk factors involved with the abuse; and
- Detailed description of the alleged abuse.

Requiring the screeners to use the database and to complete all screens would result in more detailed and thorough reports which could be transmitted electronically to the supervisor and Intake caseworker.

F4.8 CPS operates with at least one social service worker III on-call every night. CPS uses a rotating schedule to assign workers to on-call duties. If a referral is called in, the call is routed to the Communications Center and a dispatcher pages the on-call caseworker. The caseworker screens and rates the call as an emergency or non-emergency and follows CPS and ODJFS response protocols. The Ohio Department of Job and Family Services (ODJFS) requires that investigations for emergencies are initiated within one hour of receiving the referral and investigations for non emergencies are initiated within 24 hours. CPS's rotating schedule provides sufficient on-call staffing to meet after hours staffing requirements. Although additional costs are incurred for staff overtime, the costs are lower than those incurred for requiring staff report to the facility to receive the calls or staffing a 24-hour hotline.

C4.3 CPS has developed a cost effective and efficient process for receiving child abuse and neglect reports 24 hours a day, 7 days a week. The on-call rotation method allows CPS to remain compliant with ODJFS guidelines with the initiation of emergency referrals. This rotation method also enables CPS to begin the investigation process immediately after a referral is made.

Risk Assessment Usage

F4.9 All CPS social service worker IIIs, IVs and supervisors are instructed to use the ODJFS risk assessment field guide in performing Intake investigations. The ODJFS risk assessment field guide was modeled after the Washington State model and assesses 32 separate items identifying parental characteristics, child characteristics, family functioning and environmental factors. Also, the risk assessment helps caseworkers determine family strengths and weaknesses in order to identify the appropriate services for the family. The use of ODJFS guidelines allows CPS to perform investigations based on consistent risk assessment measures, thereby limiting the amount of subjectivity in the caseworkers' field decisions and ensuring that each referral receives a fair and objective assessment.

A sample of 10 Intake investigation reports showed that investigation reports and risk assessments were completed for each but safety plans were completed for only two cases. The referrals and resulting investigation reports showed several inconsistencies in the information recorded and the steps completed by the caseworker. Furthermore, referrals indicating dispositions of physical and emotional abuse, revealed a high degree of ambiguity in evidence collected and reported. According to CPS employees, an emergency referral rating is only used when the child is deemed to be at imminent risk. In cases where an emergency referral rating is used, safety plans are usually not developed because CPS implements out-of-home placement immediately. CPS changed Agency policy in July of 2000 to require the creation of a safety plan for all applicable cases. As of August 2000, CPS had only two emergency referrals in FY 2000. However, the low number of emergency referrals does not explain the absence of safety plans in 8 of the 10 sample cases. Inconsistencies in investigation reporting and the lack of safety plan development could potentially hamper CPS's efforts to protect children.

R4.5 CPS should establish clear criteria and specific policies regarding the types of case situations accepted for investigation and expedited as emergency situations. CPS should also provide intensive training and coaching to help Intake caseworkers master the risk assessment tool and to develop safety plans for children remaining at home. Such training should help to ensure consistent and accurate reporting on the risk assessment tool. More specifically, CPS should consider requiring all Intake caseworkers and supervisors to attend *Building Skills in Family Risk Assessment* training offered through the Ohio Child Welfare Program. Safety planing should also be incorporated as a regular part of all investigations in which children

are found to be at moderate or high risk of harm. Potential safety risks to caseworkers should be recorded and incorporated into the case file as well.

Specialization in Intake Investigative Functions

F4.10 CPS does not have specialized units or formally designated staff with expertise in areas such as out-of-home abuse, sex abuse, or chemical dependency. Cases are assigned to caseworkers according to the County's school districts, and if the supervisor feels that one worker does well with a certain type of case, the supervisor may make an exception and assign the case to that particular worker.

Butler County Children's Service Board has a special investigative unit (SIU) responsible for the investigation of the most severe allegations of child abuse. This unit is responsible for all high risk cases, such as severe physical or sexual abuse, and all third party investigations of abuse that occur outside of the home setting. The SIU receives specialized intensive training which specifically prepares the unit to handle and assess severe cases of abuse. Cooperation with law enforcement officials is also heavily emphasized. Due to the intensive nature of severe cases of abuse, social workers in SIU maintain lower caseloads than regular Intake workers. However, the time intensive nature of the SIU cases prevents the assignment of extra investigations to SIU social workers.

Cuyahoga County Children and Family Services (CFS) also has specialty units to address the many facets of child abuse and neglect recognized within CFS. The specialty units include a SIU, sex abuse and chemical dependency unit. These units have been developed to provide specialized service delivery to the clients of CFS. The large clientele served by CFS merits the need for specialized units to address the varying amounts of occurrences of out-of-home abuse, sex abuse and chemical dependency. Although the units only receive cases identified within their area of expertise, case assignment is not isolated to these units. The specialized units perform the following duties:

- The SIU investigates reports of abuse and neglect in out-of-home settings such as daycare facilities, foster homes and schools. SIU also investigates fatalities of children involved with the CFS.
- The Sex Abuse Unit investigates reports of sex abuse for new and open cases within CFS. Social workers in this unit receive specialized training to ascertain the fragile information that child sex abuse cases present and refer substantiated or indicated cases for the appropriate services. If the case is open with an Ongoing caseworker, it is the responsibility of the Ongoing caseworker to provide any necessary follow-up services.

- Sobriety Treatment and Recovery Teams (START) is CFS's chemical dependency unit. The START team consists of a social service worker III and a social service aide I who serves as a paraprofessional and has two years of recovery or extensive firsthand knowledge of chemical dependency training. CFS attempts to staff the teams with at least one recovering individual.

R4.6 CPS should consider providing specialized service delivery to the children and families of Clermont County through the development of formal caseworker specialization. Although the number and types of open cases within CPS does not merit the development of specialized units, increased training for all staff and formal recognition of specialization would ensure that the Agency has a specialist in all necessary areas (special investigations, sex abuse and chemical dependency). Formally designating specialists within the Intake Unit to assist in these areas would improve the quality of services and levels of expertise available to children and their families. Providing formal training to caseworkers in these areas would also give CPS an in-house consultant for such cases and could help distinguish the difference between an indicated and substantiated investigation. Furthermore, specialists could develop communication networks to enhance available services by consulting with other specialized units throughout the State and by cultivating resources within the community.

Investigation Completion

F4.11 **Table 4-3** shows the percentage of investigations completed within 30 and 45 days and the percentage of emergency investigations initiated within the 1-hour ODJFS mandate for CPS and the peers.

Table 4-3: Investigation Initiation and Completion

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Emergency Investigations Initiated within One Hour	100.0%	48.2%	75.0%	80.0%	100.00%	80.6%
Investigations Completed within 30 days	77.8%	69.2%	67.3%	90.2%	97.4%	80.4%
Investigations Completed within 45 days	95.1%	81.6%	86.5%	93.1%	97.4%	90.7%

Source: CPOE Indicators July-December 1999

CPS and Trumbull County were the only agencies with 100.0 percent initiation of emergency investigations within the State-mandated one-hour time line. Child Welfare League of America (CWLA) recommends that investigations be completed within a maximum of 30 days while most should be completed within 10 to 14 days. Extensions should only be granted in situations where it is impossible to gather sufficient data to make an accurate case disposition within the 30-day time period. CPS completed 77.8 percent of investigations and risk assessments within the 30-day time line which is slightly below the peer average. However, 95.1 percent of investigations were completed within 45 days. CPS management stated that the Agency uses the 45-day time line extension to gather additional investigative information about the referral. CPS exceeds the recommended investigation time frames in approximately 17.3 percent of cases. Investigation completion rates are included as performance measures in Unit Plans of Work (see *Clermont County Children's Protective Services, Policies and Procedures*).

R4.7 CPS should attempt to expedite the investigation process to meet the CWLA recommended benchmark of 30 days. Local law enforcement, who are sometimes the cause of delays, should be fully informed about the time frames for investigation closure and should, as a component of the interagency agreement (see **R4.12**), assert their willingness to expedite investigations whenever possible. Investigations and case plans should be completed without delay so that families may receive needed services in a timely manner. Implementing safety plans also reduces the potential for a reoccurrence of harm to the family or child. CPS should only use the 45-day extension in the most extreme cases or when absolutely necessary. CPS should continue to include investigation completion rates in Unit Plans of Work and should also correlate the rates to Intake caseworker performance evaluations.

Automation and Technology Usage in Case Documentation

F4.12 Intake caseworkers manually document their daily activities for each investigation on individual contact sheets. Contact sheets are kept by the caseworker until the case is ready to be closed. This process necessitates extensive maintenance of paper files.

Automation and the use of case management software is recognized as a best practice in child welfare. Automation reduces paperwork and allows colleagues and supervisors to examine case documentation. Electronic documentation forms usually provide the following information for each engagement:

- Determination of successful or unsuccessful contact;
- All individuals contacted who were involved in the abuse referral;
- Place and time of the contact;
- Subject or reason for the contact; and
- Detail of what occurred during the contact.

In 1998, CPS employees received computers from ODJFS for its daily operations. CPS staff members have access to word processing software and have the technology to create standard forms on the computer for case management use. However, the computers are not currently used to record or store case record data.

R4.8 CPS should consider maintaining case documentation in a database or in case management software. Computerizing case documentation would eliminate the need to maintain paper files. A database could be developed internally by the County's Information Services Department (ISD) through the use of the CPS's Corel Paradox database software. This database program operates in a windows-driven environment and contains extensive tutorials and user help features, making the establishment of databases fairly simple. More information regarding other types of case management available to CPS is provided in *Clermont County Children's Protective Services, Policies and Procedures*.

F4.13 CPS has access to a limited number of laptop computers. Accessibility and concerns regarding security have prevented CPS from using the laptops in the field or linking them through a dial-up connection to the County server and to the statewide ODJFS network. Several peer and best practice counties currently use laptop computers in the field to speed investigation reporting, reduce return trips to the office, and minimize paper documentation. Because CPS does not fully use the technological resources available to the Agency, caseworkers continue to use a cumbersome manual process to document case activities.

The County is implementing an 800 megahertz (MHz) communication system for the Sheriff's Department. The Sheriff's Department will use on-board computers to access criminal records in the field. Permit Central is also planning to use the 800 MHz system to connect inspectors in the field with laptop computers to the Permit Central computer system. Although CPS has access to 18 cars with the 800 MHz two-way communication system, there are no plans to use the 800 MHz system to allow field investigators to communicate with the Agency's computer system via their laptop computers.

R4.9 CPS should use the 800 MHz system to connect field investigators using laptop computers and the Agency's computer system. Connectivity between field investigators and the Agency's computer system will allow investigators to immediately share data on case plans and risk assessments, communicate potential intervention needs with Ongoing and Permanency Planning caseworkers, access regional intervention and treatment resources, and respond to client needs in a more complete and vigorous manner. CPS would need to purchase its own laptop computers (approximately 12 for the Intake Unit and 15 for the Ongoing Unit) which would cost approximately \$32,000. The addition of communication

software and an antenna to the laptops would cost approximately \$800 each while the implementation of security systems for the network, through software such as Novell Modular Authentication Service and Cryptograph Support Modules, would cost approximately \$4,900 for 50 users.

Financial Implication: CPS could purchase the 27 laptops needed for Intake and Ongoing caseworkers for \$32,000. Communication modules would cost approximately \$21,000 while network security software would cost an additional \$4,900.

Internal and Interagency Training

F4.14 CPS staff actively participates in safety awareness training. The safety awareness training includes personal safety, driving safety, and de-escalation training and is considered a best practice in caseworker training. Although CPS does not have a policy requiring this type of training, any worker who requests safety training is granted the opportunity to attend.

C4.4 The implementation of safety awareness training within CPS ensures that caseworkers can learn personal safety and de-escalation techniques to reduce the likelihood of encountering violence while on the job. While performing investigations where police involvement is not initially required, knowledge of personal safety and de-escalation intervention is crucial for caseworkers when interactions become contentious.

R4.10 CPS should require all caseworkers to attend safety awareness training and refresher courses on a biannual basis. Allowing caseworkers to attend on a voluntary basis does not ensure that all caseworkers have working knowledge of personal safety and de-escalation techniques. Each caseworker in CPS's employ should have these tools at his or her disposal, especially in intense or highly contentious interactions with alleged abuse perpetrators and victims.

F4.15 Clermont County has also implemented a Child Abuse Investigative Team comprised of social workers, law enforcement personnel, prosecutors and medical professionals. The Child Abuse Investigative Team increases communication between agencies and personnel who regularly address child protection issues. The team meets once a month to update members on potential child abuse situations that have been identified by one of the agencies.

C4.5 The Child Abuse Investigative Team circulates information among community agencies working for the protection of Clermont County children and increases cooperation in providing child welfare services. Involving all County agencies responsible for child protection and encouraging an open-line of communication, forges partnerships, reduces the duplication of services, and increases the development of creative and effective methods of service delivery.

F4.16 Although cross-training occurs among local police officers and CPS caseworkers, a formalized program has not been developed to facilitate the training. Local police officers and caseworkers at CPS attend safety and investigation training at the Ohio Peace Officer Training Center. These training sessions are designed to develop a consensus for the criteria gathered in investigation to reduce the number of interviews conducted during the investigation phase of the case with an alleged child victim or the alleged perpetrator of child abuse and neglect. The safety training is also designed to train caseworkers to protect themselves in hostile and threatening situations. Caseworkers attend training at the Ohio Peace Officer Training Center once a year.

Periodically, CPS invites local police officers and other County officials to learn of changes in CPS or ODJFS policy as well as changes in Ohio or federal law. This training, designed by CPS staff, occurs as new legislation and regulations affecting standing operating procedures arise. The informational sessions that CPS conducts for changes in procedure are not required for other agencies; rather, they are offered as a courtesy among the County's agencies who work with CPS on a regular basis.

C4.6 The training that CPS caseworkers and local police officers attend helps in developing a common reference for the protection of children and the investigation of child abuse and neglect. As police officers and caseworkers learn the same key principles for child protection and child abuse investigations, they are able to reduce the duplication of effort and provide more efficient services to the children and families of Clermont County.

R4.11 A formal cross-training program should be developed between CPS and local law enforcement personnel. By establishing a formal cross-training program, CPS would provide all law enforcement personnel and CPS caseworkers with consistent directions on conducting investigations related to child abuse and neglect. Equipping law enforcement personnel and caseworkers with this information will also eliminate the need to gather collateral information to complete the investigations. Law enforcement representatives should support formalization of cross-training programs and should encourage maximum attendance for law enforcement personnel within their jurisdiction. Communications Center personnel should also be included in law enforcement cross-training programs to enhance dispatcher's knowledge of child abuse and neglect laws and protocols. The training program should be developed collectively by local law enforcement agencies and CPS. The program should include training sessions designed to convey a thorough blend of law enforcement and child protection issues. Training sessions should include, but not be limited to the following:

- CPS legal procedures;
- Child protection services and methods;
- Case planning;
- Effects of abuse and neglect;

- Separation and child placement;
- Risk assessments;
- Sex abuse;
- Self-defense; and
- Safety investigation.

Attendance at cross-training sessions should be mandatory for all police officers and caseworkers. A training schedule should be developed to provide training in a timely and effective manner for current staff. New employees should be phased into the training schedule as well. Biennial updates to the cross-training should be required for all CPS staff and police officers to ensure that staff remains current on practices for child protection investigations.

Interagency Cooperation and Coordination

F4.17 CPS does not have a written plan governing normal operating procedures with local police. The Clermont County Plan of Cooperation expired December 1999 and is no longer required by ODJFS. The plan identified the expectations and responsibilities of County agencies, the courts and law enforcement personnel. Although this agreement has not been renewed, CPS and local police use a memorandum of understanding, which is an abbreviated version of the plan of cooperation, and adhere to the memorandum in daily operations.

Pursuant to §2151.421 of the ORC, children service agencies are required to develop a memorandum of understanding that sets forth normal operating procedures to be employed by selected officials in the execution of their respective duties and ensures the prompt reporting of incidents of suspected abuse and neglect. The memorandum of understanding outlines the purpose and goals of the agreement, as well as mutual responsibilities regarding participation, roles and obligations for handling cases of abuse and neglect. According to the ORC, the memorandum of understanding should be signed by the following individuals:

- Juvenile judges or a Juvenile Court representatives;
- County peace officers;
- Chief municipal peace officers;
- Law enforcement officers handling abuse and neglect cases;
- County prosecuting attorney; and
- County Department of Job and Family Services' representatives.

R4.12 CPS should revise and update the Clermont County Plan of Cooperation as a detailed interagency agreement to ensure continued coordination between CPS, law enforcement and the Juvenile Court system. The detailed interagency agreement should include the various responsibilities of all agencies and individuals involved with children services in Clermont County. The interagency agreement should identify the procedures for completing investigations of child abuse and neglect to ensure coordination and consistency. The interagency agreement should establish the necessary guidelines to facilitate interagency efforts and to streamline the delivery of services to children and families in Clermont County.

Ongoing Unit

Performance Measures

The following list of performance measures were used to analyze the Ongoing Unit operations of Clermont County Children's Protective Services:

- Assess Ongoing Unit operations and caseloads;
- Evaluate Ongoing Unit operating expenditures;
- Review Unit visitation policies;
- Analyze the consistency of case documentation;
- Assess formal review processes for Ongoing cases;
- Evaluate the use of automation and technology in case documentation;
- Assess the level of detail in case plan documentation and the inclusion of quality indicators;
- Evaluate the use of home-based and program alternatives to out-of-home placement.

Findings/Commendations/Recommendations

Ongoing Unit Operations

F5.1 **Table 5-1** illustrates the operational statistics for the Ongoing Unit of CPS and the peer agencies.

Table 5-1: Ongoing Unit Operational Data

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Ongoing Caseload	15.0	18.0	11.8	16.1	14.5	15.1
Average Life of Case in Days	373	528	132	88	N/A ¹	280
Number of Children served in Temporary Custody	263	286	114	116	129	182
Percentage of Children served in Temporary Custody	86%	51%	63%	51%	69%	64%
Number of Children in Agency Permanent Custody	34	278	67	75	58	102
Percentage of Children in Agency Permanent Custody	14%	49%	37%	49%	31%	36%

Source: Agency records

¹ Information not available

CPS's Ongoing caseload is comparable to the peer average indicating an average level of efficiency when compared to the peers. CPS is also within the range of Child Welfare League of America's (CWLA) recommended caseload ratios. The CWLA recommends average caseloads for Ongoing caseworkers of approximately 12 cases per worker with a maximum of 17 per worker and only one new case for every six open cases per month. PCSAO recommends an average of 15 active cases per month as the optimal caseworker caseload. CPS's case life is the second highest of the peers and 24.9 percent above the peer average, which may be the result of extended services or, as described in **F5.8**, the cumbersome case closure process.

CPS serves the highest percentage of children through temporary services and retains the lowest percentage of children in permanent custody. The 1997 Federal Safe Families Act requires PCSAs to begin termination of parental rights if children are in temporary agency custody beyond 15 months. CPS's low percentage of children in permanent Agency custody indicates that a strong emphasis is placed on Permanency Planning which involves three potential outcomes-- parental reunification, permanent agency custody or adoption.

- C5.1** CPS retains a low percentage of children in Agency permanent custody. Permanency is an important factor which influences the stability of a child's life. By focusing on permanent living arrangements for children in Agency custody, CPS attempts to provide the highest possible level of stability and consistency for children served by the Agency. Although there is some increased risk in high levels of reunification, caseworker intervention and intensive family assistance increases the likelihood of successful parental reunification. The high percentage of children reunified with parents after temporary custody is indicative of successful intervention programs and CPS's emphasis on achieving permanency for children without heavy reliance on permanent Agency custody.
- F5.2 CPS does not use a formal case-weighting system which is generally used by PCSAs to assist management in determining and delegating appropriate levels of caseloads to each caseworker. Instead, CPS cases are assigned based on geographical regions which are delineated by school district. A caseworker who has shown particular skill with a certain type of case may be assigned a case outside of his or her assigned school district. Generally, the Ongoing supervisor assigns cases to create a balance among the following:
- **Custodial Cases** - CPS has custody of the child;
 - **Non-custodial Cases** - parents or guardian retains custody of the child (see also **F5.11**); and
 - **Protective Supervision Cases**- parents or guardian retains custody of the child, but CPS has a court order to monitor the family's activities.

Case-weighting systems are used by PCSAs to equitably distribute cases to caseworkers. Assigning cases based on geography or number of open cases does not take into account the difficulty of some types of cases or the number of children involved in each case. Without the use of a case-weighting system, clients whose cases are managed by caseworkers with difficult or high caseloads may not receive as much individualized attention as those managed by caseworkers with lighter caseloads. A case-weighting system assigns a numeric value to several elements of a case on the basis of risk and/or need. A higher numeric value indicates a higher level of difficulty.

The National Council on Crime and Delinquency (NCCD) has also developed a method for PCSAs to use when assigning cases to Ongoing caseworkers. NCCD recommends that PCSAs should determine whether the level of risk associated with the case is low, medium or high. In addition, PCSAs should determine whether the level of needs regarding the child is low, medium or high. Case assignment is then determined based on the level of severity regarding these two factors. Caseworkers are assigned cases according to case risks or needs so that both caseload and case intensity are equitably distributed among Ongoing caseworkers.

R5.1 CPS should establish a formal case-weighting system to use when assigning cases to Ongoing caseworkers. According to best practice agencies, case attributes that should be considered when assigning cases to a caseworker are current caseload size and the caseworker's strengths. In addition, NCCD recommends specific criteria to use when determining the degree of intensity required by each case. CPS's Ongoing supervisor should consider using NCCD's criteria and a case-weighting system to ensure the equitable distribution of caseloads. When assigning cases, the supervisor should examine each caseworker's total case weight, not simply caseload, before assigning additional cases.

Ongoing Unit Operational Expenditures

F5.3 **Table 5-2** illustrates operational costs related to the Ongoing Units of CPS and the peer agencies.

Table 5-2: Peer Comparison of Ongoing Unit Costs

	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average
FY 1999 Ongoing Unit Expenditures	\$1,149,410	\$1,802,649	\$2,478,683	\$1,735,137	\$1,791,470
Number of Children Served in FY 1999	530	1,020	522	619	673
Average Cost per Child	\$2,169	\$1,767	\$4,748	\$2,803	\$2,872

Source: KPMG

CPS's overall Ongoing expenditures are the lowest of the peers which could be attributed to the small size of Clermont County in relation to the peer counties (see **Table 2-6**). CPS's average cost per child is the second lowest of the peers, 24.5 percent below the peer average. CPS also served the second lowest number of children through the Ongoing Unit in FY 1999 when compared to the peers.

F5.4 **Table 5-3** shows the applied labor hours and costs for selected Ongoing Unit activities.

Table 5-3: Total Cost and Applied Labor Hours for CPS Ongoing Unit

Activity	Total Cost for Ongoing	Percent of Total Cost of Applied Labor Hours for Ongoing	Percent of Total Cost of Applied Labor Hours for CPS
Family Intervention	\$268,810	63.00%	4.37%
Court Related	\$22,914	5.37%	0.37%
Risk Assessment	\$580	0.14%	0.01%
Documentation	\$88,095	20.64%	1.43%
Adoption	\$46,311	10.85%	0.75%
Information and Referral	\$6	0.00%	0.00%
Total	\$426,716	100%	6.93%

Source: KPMG ABC Analysis

The Ongoing Unit spends the majority of its costs and labor hours in family intervention activities. However, the cost of family intervention for CPS is low when compared to the cost of placement services as discussed in **F6.5** and **R6.2**. Documentation comprises the second largest component of Ongoing expenditures. Court-related costs and hours applied are minimal in comparison to the costs to accommodate court-ordered placements (see **F7.4**). While Ongoing functions comprise only 6.93 percent of Agency costs, family intervention is only 4.37 percent of total Agency costs, potentially indicating a limited resource allocation to family intervention and preservation activities.

R5.2 CPS should consider increasing Ongoing expenditures on a short-term basis so that the Ongoing Unit can implement additional intervention programs which reduce the likelihood of placement. Although CPS's low cost per child served in the Ongoing Unit reflects the Agency's cost-consciousness, these low expenditures may be the result of higher placement costs incurred by the Agency (see **F6.5**). Alternative programs, such as in-home services and Family Preservation Programs, are designed to prevent abuse, neglect and family separation. An indirect benefit of such programs is the reduction of placement costs.

Unit Visitation Policies

F5.5 CPS's Ongoing Unit caseworkers initiate face-to-face contacts with clients in accordance with State guidelines, however the Agency's visitation policies requires contact beyond these minimum State requirements. Social work standards indicate that caseworkers need to assess the child's home environment and family interaction to accurately determine the needs of the family. This assessment occurs during face-to-face contacts/interactions with case principals inside and outside the home setting. Best practices in Ongoing case contacts recommend that children in the custody of a PCSA (out-of-home placement) or in supervised parental custody should be visited by a caseworker once every two weeks.

CPS identifies the following three minimum care levels which require a specific number of contacts each month:

- **In-home service cases** - Caseworkers must visit with each child and caretaker at least once a month, and in the home with the child and at least one parent at least once every three months;
- **Protective supervision cases** - Caseworkers must visit each child, with one parent present, at least once a week; and
- **Custody cases** - Caseworker visitation varies by type of placement, however the child's parents must be visited at least once a month.

R5.3 CPS should consider expanding the Agency's minimum visitation policy to include a greater number of visits within and outside of the home environment. Opportunities to examine the interaction between the child and parent should be emphasized, and the entire family unit should be included in face-to-face contacts as often as possible. By assessing the entire family unit, the caseworker may gain a more accurate depiction of the family's dynamics.

By increasing the minimum frequency of visits, CPS caseworkers will be able to better assess the family conditions and factors which initially contributed to the abuse and/or neglect of the child. Additional face-to-face contacts with children and case principals fosters the necessary dialogue between caseworkers and families which would enable CPS to identify and address the critical needs of the child. Finally, a written policy should be created which stipulated that the caseworker should adhere to minimum visitation policies with both biological and foster parents for children in out-of-home placement.

Ongoing Case Documentation

F5.6 CPS caseworkers track client contact obligations by manually completing contact sheets which are then placed in case records. CPS caseworkers complete contact documentation within 48 hours of each contact. Caseworkers also document contacts made by other agencies in the case records. These contacts are communicated via phone among other agencies and service providers. The information documented in CPS contact sheets includes the following:

- Date of contact;
- Individuals involved;
- Location of the contact;
- Reason for contact; and
- Events of the contact.

CPS does not require contact records to be maintained electronically. Although FACSIS identifies family contacts, it does not capture data on non-custody cases and children. Because the contact record system is not automated, supervisors are not able to sort contacts to determine compliance with ODJFS requirements.

R5.6 CPS should develop a standardized, automated system to track and monitor the type and frequency of contacts made with families and case principals. Identifying key information essential for each contact and developing a standardized computer form would enhance the legibility and consistency of case documentation, allowing supervisors to monitor services provided to clients. Standardization and automation would also increase accountability through requiring an established level of detail for contact records and allowing detailed information to be tracked for contact frequency compliance. Records should be accessible by caseworker name, case principal or child data. Automated contact records could be developed in a database format or accessed as a component of case management software (see *Clermont County Children's Protective Services, Policies and Procedures*). By standardizing and maintaining electronic contact records in an automated system, CPS supervisors will be able to supplement FACSIS and capture information on non-custody cases which is necessary to determine whether the Agency meets ODJFS requirements.

Formal Case Review Processes

F5.7 CPS has developed a formal review process for non-custody cases similar to the State-mandated Semi-annual Administrative Reviews (SAR). The State does not require non-custody cases to be reviewed through the SAR process. Through CPS's review policy, non-custody cases are reviewed by the Ongoing supervisor during monthly supervisor conferences with caseworkers and with the family and other case principals on a semi annual basis. Notification is provided to custodial parents prior to the non-custody case SAR and their participation is noted in the case records. However, the CPS practice of providing SARs to non-custody cases is not formally depicted in Agency policy.

PCAs generally have written policies for non-custody case reviews. Although the scope of case reviews vary, they generally include case principles, an examination of services provided and outcomes achieved, as well as a timely review schedule. Because CPS has not developed a formal policy and process for reviewing non-custody cases, consistent application may be affected.

R5.7 CPS should establish a formal policy describing the review process for non-custody cases. The formal policy should state the six month review window as well as the following key steps which are followed in the formal SAR process:

- Determine the services needed for case closure;
- Assess if the previous services referred have been completed; and
- Identify the progress of services not completed.

The participation and notification of all family members, service providers, court-appointed personnel and other case participants should be included in the policy. By formally establishing policies outlining the reviewing of non-custody cases, CPS could ensure consistency and long term continuation of the SAR process for non-custody cases.

Use of Automation and Technology in Case Documentation

F5.8 Although CPS policy states that Ongoing Unit documentation is to be typed on the computer, a paper-driven environment still persists in some areas. Computers are available to caseworkers, but the State software (FACSSIS) is limited in its applicability to non-custody cases and caseworkers do not extensively use the Corel Suite Software for case management activities. Processes identified as automated but often performed manually or ready for automation include:

- **Risk Assessment** - The risk assessment document, used to determine the level of risk involved in a particular case, is 26 pages in length and exists in template form on the computer. However, caseworkers often prepare this document manually.
- **Placement Reports** - Placement figures are currently obtained by hand counting case files.
- **Case File Documentation** - Although available through Corel templates, caseworkers typically hand write case notes for inclusion in the case file. Oftentimes, caseworkers then type case notes from handwritten notes, creating a duplication of effort.
- **Case File Records Retention** - Case file records are bulky and difficult to store. In instances where cases extend for several months or reenter the system several times, the file may contain extensive records. The records are not readily accessible in their paper form as they generally kept with the caseworker.

In addition, the process used to close cases requires the caseworker to manually complete several record items. These items include risk assessments, case plan amendments, FACSIS summaries and closing forms. Some delays in case closure have been attributed to the cumbersome manual process currently used by CPS. Although CPS recognizes that the manual case closing process is time consuming, the Agency has not yet made plans to implement additional technology which would expedite this process.

R5.8 CPS should implement automated processes for case management in the Intake and Ongoing units. Case management technology is discussed in *Clermont County Children's Protective Services, Policies and Procedures*. By replacing manual processes with an automated case management system, CPS could increase efficiency in risk assessment and case documentation. Case management software would also reduce CPS'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 through classification indicators derived from the case rating system (see **R5.1**).

Case Plan Documentation and Quality Indicators

F5.9 CPS develops case plans according to specific client and family needs as identified in the Risk Assessment Model. Case plans often include goals, objectives and recommended services such as parenting classes, individual or family counseling and employment services. CWLA suggests that caseworkers include the seven quality indicators in developing case plans:

- Develop specific goals;
- Outline specific steps to reach the goal;
- Develop clear time lines;
- Identify clear follow-up measures;
- Determine steps for measurable goals and objectives;
- Develop targeted plans; and
- Use needs-based interventions.

CWLA's seven quality indicators are designed to help caseworkers ensure that families are made aware of the expectations and goals required to achieve desired family functioning and case plan goals within specified time frames. The seven indicators should be used in case monitoring and referrals, communication with providers, agencies and families.

Also, best practices suggest that case plans be monitored for four basic elements which include:

- Concerns about the family or parent that are articulated in the case plan should have an equal or greater number of associated expected changes in family or parental behavior.
- The number of services recommended to change the undesirable behavior should be equal to or be exceeded by the number of services obtained and completed.
- Case plans should include the seven quality indicators.
- All participants in case plan development should sign the case plan. The participants should include the caseworker, the family and any substitute caregivers or other participants.

These basic elements ensure that conditions are addressed and intervention services are utilized by PCSA clients.

A sample of 50 case plans or 9.4 percent of CPS's FY 1999 caseload was selected for review. Each case plan was examined for the four best practice elements and the inclusion of the seven quality indicators. **Table 5-4** shows the results of the sample review.

Table 5-4: Case Plan Detail

	Actual Number	Percent of Sample
Type of Case		
Non-Custody	15	30%
Custody	20	40%
Protective Supervision	15	30%
Total	50	100.0%
Status of Case Summary		
Closed	20	40%
Open	30	60%
Number of Concerns versus Expected Changes Summary		
Number of Cases with less Concerns than Expected Changes	3	6%
Number of Concerns Equal to Expected Changes	40	80%
Number of Concerns Exceeded Expected Changes	6	12%
Undetermined	1	2%
Recommended Services versus Actual Services Received		
Cases with Rendered Services Exceeding Recommended Services	47	94%
Cases with Actual Services Equal to Recommended Services	2	4%
Undetermined	1	2%
Number of Case Plans With Seven Quality Indicators ¹		
Number of Cases with Seven Quality Indicators	47	94%
Number of Cases with less than Seven Quality Indicators	3	6%
Case Plan Participation Summary		
Agency Participation	50	100%
Family Participation	39	78%
Substitute Care Giver, Guardian ad Litem and other Participation	2	4%

Source: CPS Case Plan Sample, N=50

¹The seven quality indicators include outlined-specific goals, specific steps to reach the goal, clear time lines, identified clear follow up measures, steps for measurable goals and objectives, targeted plans, and needs based interventions.

Overall, 94 percent of CPS case plans from the sample included the seven quality indicators for case management. In the majority of cases, expected changes were realized (80 percent), services rendered exceeded the recommended levels (94 percent), and family members were included in the case planning process (78 percent). Deficiencies were noted only in substitute care giver participation (4 percent). Substitute care giver inclusion is important in the case planning process because the care giver has a strong impact on the child's sense of stability and security. Also, the care giver can directly participate in mentoring activities and other family assistance activities.

R5.9 CPS should implement additional measures to ensure that family members and substitute care providers are included in the case planning process. By including the entire team of individuals associated with the family, CPS would be able to create and sustain a greater level of commitment between the family and substitute care giver (or provider). Also, participants outside the family unit may be requested to serve as mentors or to assist the family and caseworker in modeling appropriate behavior patterns. Although families are included in the SAR process and notified before each review, additional emphasis on inclusion may result in greater levels of cooperation.

Home-based Services and Alternative Treatment

F5.10 Although CPS caseworkers often make a greater number of referrals than required in the case plans, the effectiveness of this service is not tracked by the Agency. In general, a single service provider should be used for each type of service. This enables caseworkers to accurately determine the effectiveness of the provider and the treatment administered by the provider. Bundled services, such as a provider offering psychological and substance abuse services as well as job skill training, often achieve a greater rate of success by integrating the services and treating the condition in a more holistic manner.

Alabama's Department of Human Resources addresses the specific needs of each client family by tailoring referrals and services to specific family needs. Services are tracked and the effectiveness of each type of service is assessed. In addition, expected outcomes are explicitly detailed in the case plan for each condition and type of service or treatment. Alabama's method of providing, tracking and evaluating referrals is recognized as a best practice in assessing treatment and outcomes.

R5.10 CPS should identify desired outcomes for each condition and service referral in the case plans. Caseworkers should track client progress toward desired outcomes and record the observed effectiveness of services in an automated database (see **R5.8**). The database should be used by CPS to perform the following:

- Identify services beneficial to specific client groups;
- Evaluate personalized service;
- Analyze the effectiveness of new treatment programs;
- Discontinue ineffective services; and
- Reduce redundant services.

Through activity based costing, CPS would be able to identify the most cost effective methods of treatment.

F5.11 Although CPS has not developed an extensive in-home care program, it has invested in three primary home-based services which teach parenting and life skills. Two of the primary home-based services, the Parents as Teachers Program and the Child Focus Project are designed to help parents learn effective parenting and discipline skills. The Development of Living Skills Program, provided by the students and faculty at Ohio State University, teaches parents a variety of living skills including home-making, budgeting and hygiene on an individual basis. However, CPS does not have plans to expand its in-home services programs.

In general, home-based services allow a family to remain intact while receiving specialized, intensive assistance. Home-based services are used to prevent the initial removal of children from the home or to support a healthy reunification of the children and their families. Home-based services include, but are not limited to the following:

- Family Preservation Programs;
- Parent Aides;
- Home-maker/Home Health;
- Case Monitoring;
- Parent Education;
- Family Counseling; and
- Employment and Training.

CPS does not have a family preservation program (FPP). Family preservation programs have been developed as an intervention or alternative to out-of-home placements. The program uses intensive daily case management and caseworker visits to provide families with one-on-one assistance and guidance. The use of home-based services in conjunction with family preservation programming increases a family's success rate and helps address the myriad of factors found to influence child abuse and neglect.

Butler County Children Service Board (BCCSB) has developed a voluntary FPP. BCCSB's FPP is an intensive 10-week course that involves daily visits by social workers who provide families with constant assistance in maintaining stability. According to BCCSB personnel,

the FPP achieves a high degree of success because participants receive greater levels of one-on-one support and guidance. Of the 67 families (approximately 7.3 percent of placements) served through the FPP at BCCSB in 1998, approximately 90 percent retained custody of their children. During FY 1998, the FPP cost Butler County approximately \$241,568 with a per case cost of \$3,606.

R5.11 CPS should implement additional home-based services including a family preservation program. A successful FPP provides families with intensive one-on-one assistance, guidance and mentoring opportunities. Family preservation can be used to reduce the number of cases in which children are removed from their homes. In conjunction with additional home-based services which address parenting and life-skill issues, psychological service needs and other factors prevalent in abuse and neglect cases, a family preservation program could help CPS lower placement costs and increase client success rates. The implementation of a FPP and additional home-based services would help prevent the unnecessary placement of children and would provide a variety of services that strengthen and empower family units. An FPP serving an equal number of families in Clermont County (approximately 20 families) at a similar cost per family (approximately \$3,600 per case) would cost approximately \$72,000.

If CPS were able to reduce out-of-home placements by 5.0 percent through the use of a FPP, CPS could realize a cost savings of approximately \$184,000 while a reduction of 10.0 percent would result in a cost savings of approximately \$368,000. The average cost savings would be approximately \$204,000 based on an average reduction of 7.5 percent. In addition, the FPP could reduce the rates of reoccurrences of abuse through providing important parenting and life skills to CPS clients.

Financial Implication: Clermont County could develop and implement a family preservation program to serve 20 families for approximately \$72,000 annually. The cost of the program could be offset by cost savings resulting from reduced placements. Assuming an average reduction of approximately 7.5 percent, the approximate net savings would be \$204,000.

Placement and Permanency Planning

Performance Measures

The following list of performance measures were used to analyze Clermont County Children's Protective Services placement and Permanency Planning operations:

- Assess the efficiency of County-administered and private foster care
- Assess the efficiency of adoption services
- Evaluate usage of temporary and permanent custody
- Analyze the level of placement stability
- Assess the efficiency of per diem rates
- Evaluate foster parent training opportunities
- Evaluate post-adoption service levels

Findings/Commendations/Recommendations

Operations

F6.1 **Table 6-1** compares the length of time children remain in custody for CPS and the peers.

Table 6-1: Custody Status of CPS and Peers

	Clermont County	Butler County	Lorain County	Trumbull County	Peer Average
Percent of Children Remaining in Temporary Custody after 6 Months	50.8%	56.2%	67.7%	66.2%	63.4%
Percent of Children Remaining in Out-of-Home Placement after 18 Months	21.3%	34.9%	29.0%	15.5%	26.5%
Percent of Children Remaining in Out-of-Home Placement after 36 Months	4.9%	17.0%	11.8%	7.0%	11.9%

Source: CPOE Indicators for the first half of 1999

The 1997 Safe Families Act requires PCSAs to develop permanency plans to terminate parental rights and seek adoptive placement for children in temporary custody beyond 15 months. The Act seeks to reduce the percentage of children remaining in out-of-home placement beyond 15 months. CPS does not keep children in agency custody for long periods of time. After three years, less than 5.0 percent of children remain in temporary custody. CPS's percentage of children remaining in out-of-home placement at 6, 18 and 36 months is below the peer average. CPS maintains approximately 13.0 percent fewer children in temporary custody after 6 months than peer average and 7.0 percent fewer after 36 months. In general, this information indicates a strong focus on Permanency Planning for children in CPS care.

Table 6-2 compares temporary and permanent custody status, adoptive placements, and proportion of custody terminations by reason for the first half of FY 1999 for CPS and the peers.

Table 6-2: Comparison of Custody Status and Custody Terminations

	Clermont County	Butler County	Lorain County	Trumbull County	Peer Average
Total Number of Children in Agency Custody	286	756	322	215	431
Total Number of Children in Permanent Custody	38	201	78	70	116
Children in Permanent Custody as a Percentage of Children in Agency Custody	13.3%	26.6%	24.2%	32.6%	27.8%
Total Number of Children in Permanent Custody in an Adoptive Placement	18	70	22	19	37
Adoptive Placements as a Percentage of Children in Permanent Custody	47.3%	34.8%	28.2%	27.1%	30.0%
Percent of Children Leaving Custody for Adoptive Placement ¹	8.0%	13.9%	15.8%	18.9%	16.2%
Percent of Children Leaving Custody for Reunification ¹	48.0%	38.1%	18.8%	32.4%	29.8%
Percent of Children Leaving Custody for Relative Placements ¹	22.7%	26.0%	27.7%	27.0%	26.9%
Percent of Children Leaving Custody for Other Reasons ¹	21.3%	22.1%	37.7%	21.6%	27.1%

Source: CPOE Outcome Indicators for the first half of 1999.

¹ Data reflects the proportion, by reason, of children with a custody termination during the time period.

As shown in **Table 6-2**, CPS retains the lowest number of children in permanent custody among the peers. Approximately 13.0 percent of children in CPS custody remain in permanent custody compared with the peer average of 27.8 percent. Results from Child Protection Oversight and Evaluation (CPOE) Outcome Indicator reports show that the majority of children are reunified with their biological families. Forty-eight percent of CPS custody terminations was due to reunification compared with the peer average of approximately 30.0 percent. CPS also attempts to achieve permanency by placing children with relatives and adoptive families.

C6.1 Based on CPOE Outcome Indicators, CPS achieves a higher rate of permanent placements than the peers and retains only a small percentage of children in temporary custody. CPS also maintains a low percentage of children in permanent custody and reunifies a high percentage of families when compared to the peers. These percentages are reflective of CPS's strong efforts during the past three fiscal years to prioritize, establish and implement

permanency plans and minimize permanent Agency placement. CPS's focus on permanency contributes to the stability and well-being of children under the Agency's care.

F6.2 CPS uses a combined foster care and adoption homestudy process. The combined homestudy simplifies the adoption process and increases the likelihood that a foster family will become an adoptive family. In most CPS adoptions, foster parents become the adoptive parents. According to CPOE, these adoptions are the most successful and have fewer disruptions in placement. PCSAO standards cite combined certification and approval for foster care and adoptive families as an effective practice. According to PCSAO, the combined process allows for an efficient and effective continuum of placement services.

C6.2 CPS uses a combined homestudy process for foster care and adoptive families. Combined processes are recommended by CPOE and PCSAO as best practices for permanency. The dual process benefits the child by increasing the likelihood of being permanently placed without multiple moves. CPS benefits from the simplification of the process and a reduction of time spent on multiple assessments.

Placement Costs

F6.3 **Table 6-3** compares CPS's foster care expenditures and selected placement statistics to those of the peer agencies.

Table 6-3: Agency Foster Care Comparisons

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Total Placement Expenditures ²	\$3,821,219	\$8,985,894	\$2,991,015	\$1,392,601	N/A ¹	\$4,297,682
Number of Children in Agency Custody	319 ³	915	616	381	297	506
Average Foster Care Placement Cost Per Child ²	\$15,988 ⁴	\$9,821	\$4,856	\$3,655	N/A ¹	\$8,580
Number of Children Served	3,774	5,471	N/A	7,011	4,605	5,442
Ratio of Children in Agency Custody to Children Served	1:12	1:6	N/A	1:18	1:16	1:11
Percentage of Total Placements with Private Networks	36.4%	64.0%	25.0%	7.0%	28.0%	32.1%

Source: Agency records, Butler County Children's Service Board Audit

¹ Trumbull County does not track this information.

² Expenditures for Clermont County are FY99. Peer County expenditures are based on FY98 information computed for a previous audit because this information is not tracked by the agency.

³ Total placements for FY99 including relative and other placements with no associated costs.

⁴ Cost per child does not include the 80 relative and other placements with no associated costs.

CPS's average foster care placement cost per child is higher than its peers. CPS's average cost per child of \$15,988 is 86.3 percent higher than the peer average of \$8,580. Frequent use of private network providers results in high placement costs for CPS as this option is more expensive than using County-administered homes. Over a third of CPS's foster care placements are with private networks. A majority of the peer counties use private network providers less frequently. CPS attributes the frequent use of private network providers to the specialized needs of many children in custody, including a large number of adjudicated youth in the CPS system. The overall higher costs incurred by using private network providers diverts valuable resources from other CPS programs.

F6.4 Foster care placement is recognized as the greatest cost driver for child welfare services. Resources used for placement services are diverted from alternative programs, often trapping PCSAs in a placement spending cycle with few resources remaining for alternative interventions. **Table 6-4** shows placement costs for CPS and the peer agencies.

Table 6-4: Foster Care Placement Cost, Peer Comparison

	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average
Number of Children Placed with County-administered Foster Care Providers	89	168	329 ¹	114	175
Total Cost of Placement with County-administered Foster Care Providers ³	\$370,194	\$1,175,312	\$1,360,694	\$111,075	\$754,319
Cost Per County-administered Placement ³	\$4,159	\$6,996	\$4,136	\$974	\$4,066
Number of Children Placed with Private Network Foster Care Providers	116	449	28 ¹	6	150
Total Cost of Placement with Private Network Foster Care Providers ³	\$1,900,723	\$6,939,024	N/A ¹	\$21,425	\$2,953,724
Cost Per Private Network Foster Care Placement ³	\$16,386	\$15,454	N/A ¹	\$3,571	\$11,804
Number of Children Placed with Residential Treatment Foster Care Providers	34	35	121	75	66
Total Cost of Placement with Residential Treatment Foster Care Providers ³	\$1,550,303	\$788,435	\$847,712 ²	\$843,288	\$1,007,435
Cost Per Residential Treatment Placement ³	\$45,597	\$22,527	\$7,006	\$11,244	\$21,594

Source: Agency records

¹ Lorain County's placement numbers are based on a snapshot as of December 31, 1998.

² Lorain County's Residential placement expenditures are \$102,368 plus \$745,344 per their pooled funding agreement.

³ Expenditures for Clermont County are FY99. Peer County expenditures are based on FY98 information computed for a previous audit because this information is not tracked by the agency.

CPS has the highest cost per placement for both private network foster care and residential treatment. CPS management attributed the high cost to the large number of unruly and delinquent juveniles served (see also *unruly and delinquent juveniles* subsection). CPS's cost for residential treatment, while serving only 14.2 percent of all placements, comprises approximately 40.6 percent of Agency placement costs and is 53.9 percent above the peer average. Similarly, CPS's cost for private network placements accounts for 49.7 percent of placement costs, while the cost per private network placement is 38.8 percent above the peer average. The elevated costs associated with private network foster care and residential treatment foster care impact and inflate CPS's overall costs. For additional information on placement costs, see **F7.4** and **R7.3**.

Between July 1 and December 31, 2000, CPS increased its emphasis on recruiting foster parents. The number of County-administered homes rose from 29 to 54, greatly increasing CPS's ability to place children in County-administered homes. CPS has not yet increased its emphasis on specialized training for County recruited foster parents which would allow the foster parents to provide care to children with more specialized needs.

R6.1 CPS should continue to expand the use of County-administered homes and reduce reliance on private network providers through specialized training for County-recruited foster parents (see also **R6.2**). Resources should be redirected from private providers to alternative in-home treatment programs, allowing CPS to provide a higher level of services within County-administered foster care settings. The cost savings experienced through a decreased reliance on private network providers would provide resources for greater investments in in-home services within County-administered foster homes (see also **R6.5**).

In addition, CPS should contact Butler County Children's Services Board, a neighboring county PCSA, to establish a cooperative relationship in procuring residential treatment. This relationship should increase their negotiating power and create potential cost savings for both agencies (see also **R6.2**). If CPS could reduce its cost per residential placement to levels similar to the peer average, CPS could realize a cost savings of approximately \$816,000 based on the 34 children served by residential treatment centers in FY1999.

Financial Implication: If CPS is able to reduce its cost per placement for residential treatment to levels similar to the peer average, CPS could realize a cost savings of approximately \$816,000 based on the 34 children served by residential treatment centers in FY 1999.

F6.5 **Table 6-5** shows a non-statistical random sample of per diem rates charged to CPS by network providers for normal foster care.

Table 6-5: Per Diem Rates Charged by Private Network Providers

Private Network Providers	Lowest Per Diem Rate Charged for Normal Foster Care	Amount Remitted to Foster Family	Highest Per Diem Rate Charged for Normal Foster Care	Amount Remitted to Foster Family
Focus on Youth , Inc.	\$65	\$30	\$120	\$30
Lighthouse Youth Services, Inc.	\$63	\$21	\$70	\$30
Mathis Care, Inc.	\$25	\$15	\$35	\$15
Specialized Alternatives for Families and Youth of Ohio, Inc.	\$58	\$28 - \$32 ¹	\$123	\$59 - \$69 ¹
Child Focus, inc.	\$77	\$30	\$77	\$35
Average Per Diem	\$58	\$25	\$85	\$35

Source: Contracts and Foster Care Network Provider Agencies

¹ The range was averaged when calculating the average per diem for foster care

The per diem rates established by network providers comprise administrative/overhead costs as well as direct care costs. **Table 6-5** shows the contracted rates that CPS pays to selected area network providers and the amounts remitted to their foster families. Network providers are paid between \$25 and \$120 per day to provide foster care placements to Clermont County children while an average of \$25 to \$35 is remitted to the privately contracted foster homes. The range between the low and high per diem rates charged by the network providers is based on factors such as the age and needs of client children.

CPS spent \$1,900,723 or approximately half of its foster care placement costs on private network foster care placements. CPS's cost per private network foster care placement of \$16,386 is approximately 39.0 percent higher than the peer average of \$11,804 (see **Table 6-4**). Higher per diem rates for private network foster care increase CPS's overall costs. When contracting with the network providers for standard foster care services, CPS does not make use of competitive bidding or RFPs to obtain discounts. Crawford County successfully uses RFPs to obtain discounts for various services, including standard foster care, special needs programs, group homes and residential treatment. Best practices agencies use competitive bidding to achieve lower private network placement costs and placement cost savings.

R6.2 CPS should negotiate discounts and other favorable terms with private network providers. CPS should develop relationships with surrounding county PCSAs (Warren, Butler, Clinton, Brown, and Hamilton counties) to increase their negotiating power by combining

programmatic contracts. Additional discounts obtained through competitive bidding or capped administrative costs would allow CPS to potentially decrease private network provider costs. If CPS is able to reduce its cost per private network foster care placement to levels similar to the peer average (a reduction of \$4,582 per placement), CPS could realize a cost savings of approximately \$531,000 based on the 116 children served by private network foster care providers in FY 1999.

In addition, CPS should develop an annual bidding process for private network foster care providers. CPS could solicit annual proposals from all network foster care providers and select the top providers for new placements based on services, costs and success rates. The proposals submitted by private providers may reveal lower cost options.

OAC § 5101:02-45-05 requires PCSAs to place children in the least restrictive foster care setting that addresses their individual needs. In some cases, CPS may need to contract with a more expensive private network provider in order to meet this requirement.

Financial Implication: If CPS is able to reduce its cost per private network foster care placement to levels similar to the peer average, CPS could realize a cost savings of approximately \$531,000 based on the 116 children served by private network foster care providers in FY 1999. (See also **R6.5**)

F6.6 **Table 6-6**, compares adoptive placement expenditures between CPS and the peers.

Table 6-6: Comparison of Adoptive Placement Expenditures

	Clermont County	Butler County	Lorain County	Mahoning County	Peer Average
Total County Adoptions Finalized	10	58	25	35	39
Total Private Adoptions Finalized	0	7	0	3	5 ¹
Total Adoptions Finalized	10	65	25	38	43
Total County Finalized Adoption Placement Costs	\$113,338	\$291,040	\$197,738	\$428,972	\$305,917
Total Private Finalized Adoption Placement Costs	\$0	\$35,000	\$0	\$9,349	\$22,175
Total Finalized Adoption Placement Costs	\$113,338	\$326,040	\$197,738	\$438,321	\$320,700
Total Cost Per County Adoption Finalized	\$11,334	\$5,018	\$7,910	\$12,256	\$8,395
Total Cost Per Private Adoption Finalized	\$0	\$5,000	\$0	\$3,116	\$4,058
Total Cost Per Finalized Adoptive Placement	\$11,334	\$5,016	\$7,910	\$11,534	\$8,153

Source: Agency records

¹ Lorain County was not included in this peer average.

CPS's cost per finalized adoption is higher than the peers. CPS spends approximately \$11,000 per adoption compared with the peer average of approximately \$8,000. Unlike Butler and Mahoning Counties, CPS does not utilize private adoption placement services. The peer average cost per private adoption is approximately \$7,000 less than CPS's cost per County adoption. The lower cost for private placements is a result of a reduction in agency overhead costs in relation to market costs for adoption services.

R6.3 CPS should conduct an in-house study to determine the feasibility and cost of using private adoption placement services. If CPS could achieve the peer average cost of \$4,000 per private adoption, they could save approximately \$7,000 per adoption.

Financial Implication: If CPS could achieve the peer average cost of \$4,000 per private adoption, they could save approximately \$7,000 per adoption for a total of \$70,000 based on FY 1999 finalized adoptions.

Recruitment

F6.7 **Table 6-7** shows the number of County-administered foster homes, the total number of placement services in FY 1999 and other related statistics among CPS and the peer agencies.

Table 6-7: County-administered Foster Homes and Other Related Statistics

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Number of County-administered Foster Care Homes	53	160	165	107	95	132
Ratio of County Homes to Population	1: 3,201	1: 1,822	1: 1,643	1: 2,475	1: 2,390	1: 1,855
Total Number of Beds	265 ¹	800	825	535	475	660
Ratio of Beds to Population	1: 640	1: 364	1: 329	1: 495	1: 478	1: 371
Percentage of Total Placements in County Foster Homes	27.9%	36.0%	75.0%	93.0%	72.0%	60.8%
Total Number of Children in Agency Custody	319 ³	915	616	381	297	506
Demand for County-administered Foster Care Homes²	6.0	5.7	3.7	3.6	3.1	4.4
Position Dedicated to Recruitment of Foster Care Homes	Part Time	Full Time	Full Time	Full Time	Full Time	N/A

Sources: Annual reports, Agency records

¹ For the purposes of this calculation, it is assumed that each Clermont County foster care home can accept the maximum number of foster children (5). Within Clermont County, each foster home may be licensed to accept up to five foster children minus any biological children residing in the home. Therefore, the actual number of beds per County administered foster home may be less than shown in **Table 6-7**.

² Demand is calculated by dividing the total number of children in custody by the current number of county-administered homes. A higher number indicates that there are more children in need of foster care placement than there are county-administered homes.

³ CPS's total includes Relative and "Other" placements with no associated costs.

CPS maintains the lowest number of County-administered foster homes under contract (53) which is approximately 59.8 percent less than the peer average. When adjusted for population, CPS has fewer County-administered foster homes per capita than the peers. Assuming maximum capacity, the number of available beds in County-administered homes could accommodate approximately 85.0 percent of children in CPS custody. CPS's usage rate is approximately 28.0 percent, indicating a heavy reliance on private network providers. When compared to the peers, CPS has the lowest percentage of children placed in County-administered homes which is 32.9 percent below the peer average.

The low number of County-administered foster homes to meet the demand indicates that CPS is not meeting its foster care recruitment needs. CPS allocated a total of \$3,348 to foster parent recruitment in FY 1999 which resulted in the identification of 22 potential foster care providers.

R6.4 CPS should begin using the available beds in County-administered homes and should work to reduce reliance on private network foster homes. Additionally, CPS should increase foster care recruitment efforts to recruit a greater number of County-administered foster parents. If CPS increased the number of County-administered foster care providers to approximately 75 homes (22 additional homes), the demand ratio would drop to 4.2, which is consistent with the peer average. A low demand ratio would ensure that CPS has available County-administered homes to be used in lieu of the more expensive private network providers.

F6.8 **Table 6-8** compares the per diem rates paid for County-administered homes among CPS and the peer agencies. CPS's per diem rate for normal County-administered foster care providers ranges from \$13 to \$14. The per diem rate may be increased to a maximum of \$40 for the care of delinquent or unruly youth with exceptional needs. Special and exceptional needs rates are not included in **Table 6-8**.

Table 6-8: Per Diem Rates Paid for County-Administered Foster Homes

	Clermont County	Butler County	Lorain County	Mahoning County	Trumbull County	Peer Average
Lowest Per Diem Rates Paid for Normal Foster Care Services	\$13.00	\$19.25	\$24.00	\$13.00	\$16.58	\$17.17
Highest Per Diem Rates Paid for Normal Foster Care Services	\$14.00	\$22.54	\$30.00	\$16.00	\$20.58	\$20.62
Percent of al Foster Care Placements with Private Network Providers	36.0%	64.0%	25.0%	7.0%	28.0%	32.0%

Source: Agency records

CSP's current per diem rates for normal foster care are the lowest of the peers and approximately 24.3 percent below the peer average for the lowest per diem rate paid. Clermont County may have problems recruiting County foster parents as a result of the low per diem rate. Potential foster families may be more likely to contract with the area network providers who pay higher per diem rates. CPS management has proposed the adoption of increased per diem rates for FY 2001. CPS will determine the new per diem rates by taking an average of the per diem rates for County-administered foster care paid by the surrounding counties.

Lorain County attributes its success in recruiting foster parents to the higher per diem rate paid by the agency. Both Trumbull and Lorain Counties have established substantially higher per diem rates and are able to limit use of private network providers to only 28.0 and 25.0 percent of placements respectively.

R6.5 CPS should increase the per diem rates paid to County-administered foster homes to be more consistent with the peer average. Increasing per diem rates could enhance recruiting by attracting more County-administered foster home providers. To ensure that the rates continue to be competitive, CPS should conduct annual studies to determine if adjustments are needed. **Table 6-9** shows the potential rate increases for County-administered foster care and subsequent cost savings.

Table 6-9: Per Diem Rate Increase and Private Network Savings

	County Homes	Private Homes	Total
Current Number of Children in Placement per Month	128	183	311
Current Average Per Diem Cost	\$13.50	\$57.60	N/A
Current Average Annual Cost ¹	\$518,400	\$3,162,240	\$3,681,456
Proposed Increase in County Usage	252	59	311
Proposed Per Diem Rate Adjustment	\$20.62	\$57.60	N/A
Proposed Average Annual Cost ¹	\$1,558,872	\$1,019,520	\$2,578,392
Potential Annual Cost Increase (Decrease)	\$1,040,472	(\$2,142,720)	(\$1,102,248)

¹ Adjusted based on a placement utilization rate of 300 days per year.

If CPS raised per diem rates to the peer average of \$20.62, CPS could still realize a cost avoidance of approximately \$37 per placement per day when compared to using private networks. Additionally if CPS shifted 40.0 percent of children in private network placements to County-administered homes, they could realize a cost savings of approximately \$1.1 million even with the increase in per diem rates to County-administered homes. The cost savings from decreased placement costs could be redirected to offer additional services to families.

Financial Implication: By shifting an additional 40.0 percent of children in placements to County-administered foster care, CPS could potentially realize an annual cost avoidance of approximately \$1.1 million even with an increase of approximately \$7.00 in per diem rates to County-administered homes.

F6.9 CPS allocated a total of \$3,348 to foster parent recruitment in FY 1999, which resulted in the identification of 22 potential foster care providers. CPS has one part-time employee dedicated to recruiting County foster parents. CPS currently uses the following techniques to recruit and maintain eligible foster care providers:

- Staffs information booth at the County fair;
- Provides speakers to churches;
- Implements *Readyfest*, a program that disseminates school supplies and provides hair cuts to children entering school;
- Distributes flyers throughout the County;
- Sets up displays at post offices and schools;
- Conducts speaking engagements with the Kiwanis, Masons and Rotary Club; and
- Features foster children on the Agency Website.

According to PCSAO, the following recruitment strategies should be implemented by PCSAs to locate suitable foster care providers:

- Accept any and all speaking engagements and provides handouts;
- Encourage employees and current foster care providers to recruit;
- Consider monetary incentives targeted to these groups based on recruitment efforts;
- Include information on the Web site about foster care and adoption;
- Participate in weekly interviews on talk radio and use guest columns, paid ads or other marketing methods;
- Display ads in public governmental buildings libraries, post offices, youth centers, YMCAs and other locations;
- Foster relationships with respected members of the community including churches, neighborhood centers and other charitable organizations; and
- Engage in public foster parent recognition.

Logan County, a best practice agency in the area of foster care recruitment, follows several strategies beyond the PCSAO recommendations to heighten foster parent recruitment. Logan County's strategies include:

- Formalizing its annual recruitment strategy;
- Registering children with the Ohio Adoption Listing and *AdoptOhio*;
- Registering with regional and national adoption exchanges;
- Contracting with private, non-custodial agencies;
- Advertising;
- Finding placements with relatives who may eventually become certified foster parents before considering placements with foster parents; and
- Maintaining per diem rates that are higher than the peers.

Logan County has also formalized a month by month recruitment plan with highlighted activities and a proposed budget of \$17,610 set aside specifically for recruitment efforts.

R6.6 CPS should adopt a formal recruitment strategy consistent with CPS's strategic plan (see *Clermont County Children's Protective Services Policies and Procedures* report). By increasing County-administered foster care opportunities, CPS could reduce the current 36.0 percent placement rate with network providers and redirect children into lower cost County-administered homes. As discussed in **R6.1** and **R6.5**, the savings may be redirected to in-home services. CPS should target recruitment at 30 homes over the next three to five years to provide the needed additional beds.

F6.10 Studies indicate that PCSA support provided to foster parents is an important factor in recruiting and retaining County foster parents. CPS provides the following support services to its County-administered foster care providers:

Training and Education

- 24 hours of in-house pre-service and annual training;
- 12 hours annual training through the Southwestern Ohio Regional Training Center; and
- Parenting training.

Caseworker and Foster Parent Support

- Supervised visitations at the facility or in the field;
- Meeting facilities and support services through ABC Adopt, a Foster Parent Association that provides training and support to County-administered foster care providers;
- Staffing support through five dedicated CPS workers;
- Respite care;
- Goodie bags and school supplies; and
- Bi-monthly newsletter disseminated to foster families.

Medical Services

- Emergency Service Assistance (ESA); and
- Medical Insurance cards for foster children.

Most PCSAs offer similar support services and PCSAO recommends these practices for supporting foster families.

C6.3 CPS provides a wide array of support services to its County-administered foster homes and these services meet PCSAO recommendations. Cook County, Illinois Department of Human Services has found that support services are an important component to recruiting and retaining foster families.

F6.11 Many services and supports received in foster care are not offered, or paid, after the adoption is finalized. Foster families may not choose to adopt because these services and supports are not provided. According to FY 1999 CPOE reports, CPS uses relative placements whenever possible (68 of 319 placements in FY 1999), but few CPS adoptions are with extended family members. Most relatives prefer to remain foster families while CPS retains custody because it is less economical for a foster family to adopt.

Upon finalization of an adoption, CPS provides the following support services and subsidy referrals to their adoptive families:

- Referrals to agencies as requested by adoptive families;
- Provides consultative services to adoptive families as requested;
- Referrals to State Subsidies (NAATRIN, SAMS, Title XX, SSI, ADC) for financial assistance;
- Referrals to Federal Subsidies (PASSS, Title IV-E,) for financial assistance; and
- Referrals to Medicaid for health coverage.

These services and subsidies are typical of best practices in Ohio. These services have proven to be beneficial to both CPS and the adoptive families as they help to make the adoption process successful and decrease disruptions in placement. Although CPS provides wraparound services to adoptive families, CPOE found CPS conservative in its subsidy program with a maximum payment of \$250 per month.

Illinois operates a post guardianship program which awards custody of hard to place children to alternate caregivers such as extended family members. The program provides monitoring, financial subsidies and resources to these extended family members as if the child was in foster care. The subsidies include medicaid insurance and additional funding to be used for the care of these children. They also provide monthly adoptive family support meetings, monthly newsletters, aftercare counseling, and support services.

R6.7 CPS should follow the recommendation of CPOE and enhance their post adoptive services and subsidies. These services and subsidies may decrease disruptions, increase recruitment efforts, and heighten the level of care to adopted children.

CPS should also investigate the legality and viability of implementing a program similar to Illinois' post guardianship program. The program would benefit CPS by providing permanent

homes for children who are difficult to place. The adoptive families, relative or non-relative, could benefit from these additional services. CPS would benefit by having fewer children in permanent custody.

F6.12 CPS provides reimbursements for day care to County-administered foster care families at 100 percent of the day care costs, up to a maximum cap. In order for CPS's foster care parents to be eligible for reimbursements, the foster care expenses must meet the following criteria:

- The expenses for day care must be necessary due to employment by the foster family.
- The CPS foster care supervisor must approve the day care plan and provider.
- Day care providers must meet the State requirements regarding licensing and certification.
- The foster family must submit an original, itemized invoice from the day care provider within 30 days of the incurred costs.

C6.4 Results from foster care studies indicate that PCSAs can better maintain foster placements by providing foster families with needed resources. CPS's initiative to increase reimbursements to 100.0 percent should help increase and retain the number of County-administered foster care homes.

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Unruly and Delinquent Juveniles

Performance Measures

The following list of performance measures were used to analyze the programmatic treatment of unruly and delinquent juveniles referred to Clermont County Children's Protective Services by the Clermont County Juvenile Court:

- Assess the use of diversion programs by the Clermont County Juvenile Court;
- Evaluate the use of CPS placement by the Juvenile Court;
- Assess training opportunities provided by CPS to the Juvenile Court; and
- Evaluate the level of communication between CPS and the Juvenile Court.

Findings/Commendations/Recommendations

Diversion Services

F7.1 The Clermont County Juvenile Court Intake Department directs juvenile offenders to alternative programs in an effort to reduce the number of youth offenders tried through the court system. Diversion services are offered to two groups of children: those have the potential to be classified as unruly and delinquent and those who have the potential to be convicted of a minor criminal offense. Pursuant to Ohio Rules of Juvenile Procedure (Juvenile Rule #9), Clermont County Juvenile Court diverts cases meeting court criteria from entering the Juvenile Court system and instead places them into alternative treatment or diversion programs. Diversion programs are nationally recognized as a means to reduce the number of repeat offenders while providing a positive learning experience for first time offenders. Nine hundred and ninety three youth in Clermont County were referred for Juvenile Court Diversion Services during FY 1999. As a result of the diversion programs, only 180 were actually sent to court.

C7.1 The diversion programs used by Clermont County Juvenile Court successfully reduce the number of children entering the court system. Diversion programs provide youth offenders with positive learning experiences and may potentially reduce the rates of juvenile recidivism. Clermont County Juvenile Court's program successfully diverted 82 percent of children served.

Juvenile Court Ordered Placement

F7.2 Marion County's PCSA does not accept unruly and delinquent juveniles for placement. An agreement between the PCSA and the Marion County Juvenile Court places unruly and delinquent children in alternative services, such as intervention programs or detention centers. According to Marion County Children's Services Board, the agreement has helped to reduce the PCSA's juvenile court placement costs and has improved the County's juvenile recidivism rates.

Macomb County, Michigan has also reduced the number of first-time and repeat offenders by implementing several programs for County youth. These programs include the *Juvenile Justice* outreach program which uses mock trials to convey the seriousness of criminal actions. Macomb County also uses a first-time offense diversion program as well as a mentoring program coordinated by Michigan State University.

R7.1 CPS and the Juvenile Court should consider creating additional alternative programs similar to those used in Marion and Macomb Counties. New programs should be developed through collaborative efforts among CPS, the Juvenile Court, County prosecutors, local attorneys and

community members. By developing new alternative programs, Juvenile Court may be able to reduce recidivism rates and placements. In addition, these programs could help increase the cost effectiveness of adjudicated youth services. CPS and the Juvenile Court should consider the following steps in developing additional alternative programs:

- Improve the coordination of delinquency services among the County's social services departments and the Juvenile Court;
- Develop joint training sessions and promote the efficient use of technology;
- Develop cooperative and mutually beneficial relationships with community entities by identifying and including community stakeholders in program planning;
- Develop guidelines for formal interagency agreements to ensure clarity of goals, objectives, roles and responsibilities particularly for out-of-home placements (see **R4.12**);
- Maximize interagency resources by creating alternatives to CPS residential placement;
- Increase in-home diversion services, like those found in best practice counties, in order to decrease the length of out-of-home placements; and
- Promote collaborative decision-making between Juvenile Court and CPS to ensure the use of the most appropriate services for delinquent and unruly juveniles.

CPS and the Juvenile Court should reassess the placement methodology to minimize instances where abused and neglected children are housed with adjudicated youth in the same out-of-home placement setting. Foster care placements or detention options for adjudicated youth should reflect the child's need for solid structure and more stringent supervision to reduce recidivism.

F7.3 If a child is placed in out-of-home care through the Juvenile Court, custody is transferred to either Clermont County Department of Job and Family Services (DJFS), Ohio Department of Youth Services (DYS) or Butler County Rehabilitation Center (BRC). When the child is ordered into the custody of DJFS, services are provided by CPS. CPS's administrative caseworker is responsible for the following:

- Assuring compliance with State and federal guidelines;
- Monitoring form and motion processing; and
- Ensuring Juvenile Court case plan approvals.

Although CPS provides an adequate level of services to juvenile offenders, the costs incurred by CPS to provide these services are high (see **Table 7-1**). In FY 1999, 47.7 percent of children served by CPS through temporary foster care were referred through the Juvenile Court.

Clark County Children's Protective Services has established an interagency agreement with the Clark County Juvenile Court and ODJFS to reduce the prevalence of juvenile justice child placements under the PCSA's custody. Clark County Juvenile Court retains custody of all unruly and delinquent juveniles and is responsible for all subsequent referrals. The Juvenile Court has developed specialized programs to address the specific needs of children in its custody. Clark County maintains a 92.0 percent completion rate for its juvenile offenders referred to the court-based programs. It also has achieved an 85.0 percent non-recidivism rate in only one year of implementation. The Clark County Juvenile Court serves approximately 700 children each year. All court-based program expenditures are paid for by Reclaim Ohio funds.

Court based programs in Clermont County have an 81 percent completion rate. In addition, 85 percent of youth enrolled in the program are maintained within the community, 87 percent avoid a return to detention after the referral and 78 percent have no further charges filed against them.

R7.2 The Juvenile Court should, whenever possible, retain custody and care of unruly and delinquent children to reduce the diversion of resources from CPS. While CPS receives Medicaid funds and local dollars for placement expenditures, the Juvenile Court is eligible not only for Medicaid reimbursements, but other third-party funding sources not available to CPS. Clark County's program costs are covered entirely by Reclaim Ohio funds and a \$250,000 grant from the Ohio Department of Youth Services (ODYS). Reclaim Ohio and ODYS grant funding should be available to Clermont County which would enable the Juvenile Court and CPS to develop and implement similar programs.

The Juvenile Court and CPS should develop an interagency agreement formalizing any change in procedures. The interagency agreement (see **R4.12**) should detail the options and various programs available for unruly and delinquent juveniles. The agreement should include the following entities:

- Clermont County Board of County Commissioners;
- CPS;
- ODJFS; and
- Juvenile Court Administrator.

If interagency agreements such as the type used by Clark County are not feasible, CPS should develop a Memorandum of Understanding to outline the roles and responsibilities of probation officers and caseworkers during interagency collaboration.

F7.4 Children under the Juvenile Court's supervision follow a continuum of sanctions should they commit further offenses or violate the probation agreement. The Clermont County Juvenile

Court Probation Department and the placement unit use the following progression of services for juveniles:

- Home-based plans;
- Electronic monitoring;
- House arrest;
- Work detail/community service;
- Detention;
- Placement outside of their homes;
- Butler County Rehabilitation Center; and
- Ohio Department of Youth Services

The Ohio Department of Youth Services (DYS) and the Butler County Rehabilitation Center (BRC) are typically reserved for felon youths or youths with chronic delinquency history. **Table 7-1** illustrates the varying daily costs for the correctional institutions and foster care placements.

Table 7-1: Per Diem Placement Costs for Juvenile Delinquents

	Correctional Institutions		DHS Placements		
	Butler County Rehabilitation Center	Ohio Department of Youth Services	Clermont County Foster Care	Private Foster Care	Residential Treatment Center
Per Diem Per Child	\$70	\$105	\$32	\$47	\$87
Average Cost per Child Placement	\$16,800	\$25,200	\$7,680	\$11,280	\$20,880
Average Number of Children Placed FY 1999	18	28	N/A ¹	N/A ¹	N/A ¹

Source: CPS and Juvenile Court interviews

¹ 82 youth were placed in County foster care, private foster care and residential treatment centers at a cost of \$1.6 million or an average cost per day of \$83.

Table 7-1 indicates that per diem costs are lower for rehabilitation treatment than residential foster care placement. Also, the Juvenile Court uses Reclaim Ohio dollars to fund DHS and BRC costs while CPS pays placement costs out of the Agency's operating budget which diverts CPS's program funding from abused and neglected children. CPS and the Juvenile Court have not studied the effects of placing juvenile delinquents with abused and/or neglected children. Also, recidivism and run-away rates between CPS placement and other forms of rehabilitation treatment have not been compared.

Trends in unruly and delinquent juvenile placement indicate that the most appropriate placement environment should be the primary consideration used in case plan development. The Colorado Juvenile Justice System, which examined the effectiveness of placing unruly and delinquent children into non-correctional institutions, showed that unruly and delinquent children placed in foster care do not take punishment seriously and that the boundaries provided in foster care are not sufficiently firm. Unruly and delinquent juveniles in foster care often run away. In addition, unruly and delinquent juveniles who return home often have a higher rate of recidivism. These children have also been shown to have a negative effect on the abused, neglected or dependent children residing in the same foster care setting. Delinquent and unruly juveniles tend to be more aggressive than abused, neglected or dependent children and may perpetuate abuse on other children.

Placement costs for juvenile delinquents and unruly children, referred by Juvenile Court, represent 41.8 percent of CPS's total placement costs (approximately \$1,597,000). These elevated costs indicate a heavy reliance on CPS's placement system by the Juvenile Court. The placements of juvenile delinquents and unruly children referred by Juvenile Court account for approximately 25.0 percent of CPS's total labor hours in court interaction, placement, and administrative functions. The large expenditure of time associated with Juvenile Court placements draws valuable resources away from CPS's primary mission and places additional pressure on supervisors to provide services outside of its direct managerial control.

- R7.3** The Juvenile Court should consider options to reduce reliance on CPS out-of-home placements for unruly and delinquent juveniles. Options to consider include both in-county detention options and out-of-county treatment alternatives. Although the Juvenile Court is not a PCSA, the Juvenile Court may receive Title IV-E reimbursements through CPS. By maintaining custody of delinquent and unruly juveniles, the Juvenile Court can claim additional third party funding (ODYS grants and Reclaim Ohio funds) unavailable to CPS and reduce overall county expenditures. If the court-based programs to maximize third-party and Medicaid funding were fully utilized within Clermont County, the overall cost to the County for court ordered placements (\$1,597,000) could be reduced by as much as \$750,000, based on the FY 1999 local Medicaid match of approximately 50 percent.

Financial Implication: If the Juvenile Court reduced CPS placements of unruly and delinquent juveniles and fully utilized third-party funding sources for out-of-home placements, the overall County costs for unruly and delinquent juvenile placements could be reduced by as much as \$750,000 annually.

- F7.5 Although CPS and the Juvenile Court communicate on a daily basis, there is no formal policy to guide or facilitate interaction between the two agencies. Cross-training between CPS and the Juvenile Court occurs in Clermont County, but is not formalized. CPS, through

communication with a child's probation officer, collects and maintains all State and federal compliance documentation. On a monthly basis, the administrative caseworker and the CPS Intake supervisor meet to discuss case compliance.

R7.4 CPS and the Juvenile Court formalize the cross-training program to educate out-of-home placement probation officers on State and federal mandate requirements for the unruly and delinquent child placements. The training should incorporate case management responsibilities for juvenile justice cases and options to placement.

Additionally, CPS and the Juvenile Court should develop a formal policy outlining the frequency and form of communication between the administrative social worker and the Juvenile Court's out-of-home placement probation officers. Frequent communication is essential to ensure that the children placed through Juvenile Court receive the best possible treatment. Communication should take place at least once a week and should include all parties responsible for the care of the child in placement. All communication should be documented in the case file.

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