

FILED

FEB 27 2007

CLERK, U.S. DISTRICT COURT
DISTRICT OF COLUMBIA

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

LASHAWN A., et al.,

Plaintiffs,

--v.--

ADRIAN M. FENTY, as Mayor of the
District of Columbia, et al.,¹

Defendants.

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) Civ. No. No. 89-1754 (TFH)
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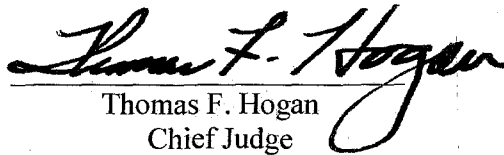
ORDER

Pursuant to the Court's Order of January 6, 2003, the parties have worked together to develop an Amended Implementation Plan for the Court's approval. Upon consideration of that Amended Implementation Plan as provided to the Court on February 15, 2007, the hearing held on 2/27/07, and the record herein, it is hereby

ORDERED that the Amended Implementation Plan, a copy of which is attached hereto, be and hereby is approved.

SO ORDERED.

February 27, 2007


Thomas F. Hogan
Chief Judge

¹ As a result of the change in administration, the parties have here substituted as a Defendant Mayor Adrian M. Fenty for former Mayor Anthony A. Williams.

LaShawn A. v. Fenty
Amended Implementation Plan

February 2007

Center for the Study of Social Policy
1575 Eye Street, NW, Suite 500
Washington, DC 20005

LaShawn A. v. Fenty
Amended Implementation Plan
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PREAMBLE

The parties previously having submitted and the Court having entered for judicial enforcement the April 2003 Implementation Plan ("IP") as developed by the Court Appointed Monitor in consultation with the parties pursuant to Section XX.B of the Modified Final Order ("MFO") in LaShawn v. Williams, C.A. No. 89-1754;

The IP having set forth certain interim performance benchmarks together with interim compliance dates and further having set final performance benchmarks to be met by Defendants with respect to the enforceable requirements of the MFO and IP no later than December 31, 2006; and Defendants having not met all of those benchmarks by that date;

The parties hereby submit this Amended Implementation Plan ("AIP"), which includes Outcomes to be Achieved, Outcomes to be Maintained and a Strategy Plan with Action Steps to Achieve Critical Safety, Permanence and Well-Being Outcomes, as developed by the Court Appointed Monitor in consultation with the parties pursuant to Section XX.B of the MFO. Upon approval by the Court of this AIP, it shall be judicially enforceable and shall govern implementation of child welfare reform under the Court's Modified Final Order through December 31, 2008. The final performance benchmarks as set forth in the IP are reincorporated in the AIP. The Monitor shall prepare and submit to the Court every 180 days an interim performance report setting forth (1) aggregate performance determinations in relation to the Outcomes to be Achieved and Outcomes to be Maintained and (2) findings regarding whether Defendants are making acceptable progress toward the final performance benchmarks. In executing and agreeing to this Amended Implementation Plan, Defendants and Plaintiffs reserve whatever rights and objections they have previously asserted in response to the May 2003 Implementation Plan.

**SECTION I:
OUTCOMES TO BE ACHIEVED BY DECEMBER 31, 2008
TO ENSURE CHILD SAFETY PERMANENCY AND
WELL-BEING AND SYSTEM ACCOUNTABILITY**

A. GOAL: CHILD SAFETY

1. Investigations

- a. Investigations of alleged child abuse and neglect shall be initiated within 48 hours. Initiation of an investigation includes seeing the child and talking with the child outside the presence of the caretaker. When children are not immediately located, documented good faith efforts to see the child within the first 48 hours shall include visiting the child's home, school and day care in an attempt to locate the child as well as contacting the reporter, if known, to elicit additional information about the child's location; contacts with the police shall be made for all allegations that involve moderate and high risk cases.
- b. Investigations of alleged child abuse and neglect shall be completed within 30 days.
- c. Reports of abuse and neglect in foster homes and institutions shall be comprehensively investigated; investigations in foster homes shall be completed within 30 days and investigations involving group homes, day care settings or other congregate care settings shall be completed within 60 days.

2. Acceptable Investigations

CFSA shall routinely conduct investigations of alleged child abuse and neglect. Evidence of acceptable investigations shall include:

- a. Use of CFSA's screening tool in prioritizing response times for initiating investigations, and use of risk assessment protocol in making decisions resulting from an investigation;
- b. A full and systematic analysis of a family's situation and the factors placing a child at risk;
- c. Appropriate interviews with needed collateral contacts and with all children in the household outside the presence of the caretaker, parents or caregivers, or shall include documentation, by the worker, of good-faith efforts to see the child and that the worker has been unable to locate the child; and

- d. Medical and mental health evaluations of the children or parents when the worker determines that such evaluations are needed to complete the investigation.

3. *Services to Families and Children*

Appropriate services, including all services identified in a child or family's case plan, shall be offered and children/families shall be assisted to use services, to support child safety, permanence and well-being.

4. *Social Worker Visits to Families with In-Home Services*

A CFSA worker or a qualified worker from a service provider authorized by CFSA shall make twice-monthly visits to families in which there has been substantiated abuse or neglect, with a determination that each child can be maintained safely in the home with services. At least one visit per month shall be in the home, but the second can be at the child's school, day care or elsewhere. Workers are responsible for assessing the safety of each child at every visit and each child must be separately interviewed at least monthly outside of the presence of the caretaker.

5. *Social Worker Visits to Children in Out-of-Home Care*

- a. CFSA or contract social workers with case management responsibility shall make twice-monthly visits to each child in out-of-home care (foster family homes, group homes, congregate care, independent living programs, etc.). At least one visit per month shall be in the home, but the second can be at the child's school, day care or elsewhere.
- b. Workers are responsible for assessing the safety of each child at every visit and each child must be separately interviewed at least monthly outside of the presence of the caretaker.

6. *Social Worker Visits to Children Experiencing a New Placement or a Placement Change*

- a. CFSA or contract agency social workers with case responsibility shall make weekly visits during the first four weeks of placement and twice monthly visits thereafter to each child newly placed in out-of-home care (foster family homes, group homes, congregate care, independent living programs, etc.) or moved to a new placement.
- b. Workers are responsible for assessing the safety of each child at every visit and each child must be separately interviewed at least monthly outside of the presence of the caretaker.

B. GOAL: PERMANENCY

7. *Relative Resources*

CFSA shall investigate relative resources in all cases requiring removal of children from their homes.

8. *Placement of Children in Most Family-like Setting*

- a. Children in out-of-home placement shall be placed in the least restrictive, most family-like setting appropriate to his or her needs.
- b. No child shall stay overnight in the CFSA Intake Center or office building
- c. No child shall remain in an emergency, short-term, or shelter facility or foster home for more than 30 days.

9. *Placement of Young Children*

- a. Children under 12 shall not be placed in congregate care settings for more than 30 days unless the child has special treatment needs that cannot be met in a home-like setting and unless the setting has a program to treat the child's specific needs.
- b. CFSA shall place no child under six years of age in a group care non-foster home setting, except for those children with exceptional needs that cannot be met in any other type of care.

10. *Visits Between Parents and Workers or Providers*

For children with a permanency goal of reunification, in accordance with the case plan, the assigned worker or designated family services provider should meet with the parent(s) no less frequently than twice a month in the first three months post-placement unless there is documentation that the parent(s) is(are) unavailable or refuses to cooperate with the Agency.

11. *Visits Between Parents and Children*

There shall be weekly visits between parents and children with a goal of reunification unless clinically inappropriate and approved by the Family Court. In cases in which visitation does not occur, the Agency shall demonstrate and there shall be documentation in the case record that visitation was not in the child's best interest, is clinically inappropriate or did not occur despite efforts by the Agency to facilitate it.

12. *Appropriate Permanency Goals*

Children shall have permanency planning goals consistent with the Federal Adoption and Safe Families Act (ASFA) and District law and policy guidelines.

13. *Reduction of Multiple Placements for Children in Care*

- a. Of all children served in foster care during the fiscal year (2007 and subsequent years), and who were in care at least 8 days and less than 12 months, 88 percent shall have two or fewer placements.
- b. Of all children served in foster care during the fiscal year (2007 and subsequent years), and who were in care for at least 12 months but less than 24 months, 65% shall have had two or fewer placement settings.
- c. Of all children served in foster care during the fiscal year (2007 and subsequent years), and who were in care for at least 24 months, 50% shall have had two or fewer placement settings since October 1, 2004 or entry into care (if entry was after October 1, 2004).

14. *Timely Approval of Foster/Adoptive Parents*

- a. CFSA shall have in place a process for recruiting, studying and approving families interested in becoming foster or adoptive parents that results in the necessary training, home studies, and decisions on approval being completed within 120 days of beginning training.
- b. CFSA should ensure training opportunities are available so that interested families may begin training within 30 days of inquiry.

15. *Legal Action to Free Children for Adoption*

Children with a permanency goal of adoption shall have legal action initiated to free them for adoption within 45 days of their permanency goal becoming adoption.

16. *Timely Adoption*

- a. Children with a permanency goal of adoption should be in an approved adoptive placement within nine months of their goal becoming adoption.
- b. Within 95 days of a child's permanency goal becoming adoption, CFSA shall convene a permanency planning team to develop a child-specific recruitment plan which may include contracting with a private adoption agency for those children without an adoptive resource.

- c. CFSA shall make all reasonable efforts to ensure that children placed in an approved adoptive home have their adoptions finalized within twelve (12) months of placement in the approved adoptive home.

17. Case Planning Process

- a. CFSA shall, with the family, develop timely, comprehensive and appropriate case plans in compliance with District law requirements and permanency timeframes, which reflect family and children's needs, are updated as family circumstances or needs change, and CFSA shall deliver services reflected in the current case plan.
- b. Case plans shall be developed within 30 days of the child entering care and shall be reviewed and modified as necessary at least every six months thereafter, and shall show evidence of appropriate supervisory review of case plan progress.
- c. Every reasonable effort shall be made to locate family members and to develop case plans in partnership with youth and families, the families' informal support networks, and other formal resources working with or needed by the youth and/or family.
- d. Case plans shall identify specific services, supports and timetables for providing services needed by children and families to achieve identified goals.

18. Placement Licensing

Children shall be placed in foster homes and other placements that meet licensing and other MFO placement standards and have a current and valid license.

C. GOAL: CHILD WELL-BEING

19. *Community-based Service Referrals for Low & Moderate Risk Families*

Families who have been the subject of a report of abuse and/or neglect that is determined to be low or moderate risk and needing additional supports shall be referred to an appropriate Collaborative or community agency for services and supports.

20. *Sibling Placement and Visits*

- a. Children in out-of-home placement should be placed with some or all of their siblings.
- b. Children placed apart from their siblings should have at least twice monthly visitation with some or all of their siblings.

21. *Placement within 100 Miles of the District*

No more than 82 children shall be placed more than 100 miles from the District of Columbia. (Children placed in kinship or pre-adoptive family-based settings under the ICPC shall be exempt from this requirement.)

22. *Assessments for Children Experiencing a Placement Disruption*

CFSA shall ensure that children in its custody whose placements are disrupted are provided with a comprehensive and appropriate assessment and follow-up action plans to determine their service and re-placement needs no later than within 30 days of re-placement.

23. *Services to Promote Stability*

CFSA shall provide for or arrange for services required by the MFO through operational commitments from District public agencies and/or contracts with private providers. Services shall include (a) services to enable children who have been the subject of an abuse/neglect report to avoid placement and to remain safely in their own homes; (b) services to enable children who have been returned from foster care to parents or relatives to remain with those families and avoid replacement into foster care; (c) services to avoid disruption of an adoptive placement that has not been finalized and avoid the need for replacement; and (d) services to prevent the disruption of a beneficial foster care placement and avoid the need for replacement.

24. *Health and Dental Care*

- a. Children in foster care shall have a health screening prior to placement.
- b. Children in foster care shall receive a full medical and dental evaluation within 30 days of placement.
- c. CFSA shall provide caregivers with documentation of Medicaid coverage within 5 days of every placement and Medicaid cards within 30 days.
- d. Medicaid coverage shall remain active for the entire time a child is in foster care.

D. GOAL: RESOURCE DEVELOPMENT AND
SYSTEM ACCOUNTABILITY

25. Financial Support for Community-Based Services

The District shall provide evidence of financial support for community- and neighborhood-based services to protect children and support families.

26. Resource Development Plan

The District shall implement the CFSA Resource Development Plan, which is to be developed by June 30 each year. The Resource Development Plan shall include all of the components listed in Item 15b of the Outcomes to be Maintained section of this document.

27. Post-Adoption Services

CFSA shall make available post-adoption services necessary to preserve families who have adopted a child committed to CFSA.

28. Caseloads

- a. The caseload of each worker¹ conducting investigations of reports of abuse and/or neglect shall not exceed the MFO standard, which is 1:12 investigations.
- b. The caseload of each worker providing services to children and families in which the child or children in the family are living in their home shall not exceed 1:15 families.
- c. The caseload of each worker providing services to children in placement, including children in Emergency Care and children in any other form of CFSA physical custody, shall not exceed 1:15 children for children in foster care.
- d. The caseload of each Permanency Specialist shall not exceed 30 children with the goal of adoption/guardianship. An implementation assessment shall be completed to determine effectiveness.
- e. The caseload of each worker having responsibility for conducting home studies shall not exceed 30 cases.

¹ All requirements apply to both CFSA workers and private agency workers. All CFSA contracts with private agencies providing foster care services shall include performance expectations for visitation of children in foster care in compliance with MFO visitation requirements.

- f. There shall be no cases unassigned to a social worker for more than five business days, in which case, the supervisor shall provide coverage but not for more than five business days.

29. Supervisory Responsibilities

- a. Supervisors who are responsible for supervising social workers who carry caseloads shall be responsible for no more than six workers, including case aides, or five caseworkers.
- b. No supervisor shall be responsible for the on-going case management of any case.

30. Training for New Workers and Supervisors

- a. New workers shall receive the required 80 hours of pre-service training through a combination of classroom and on-the-job training in assigned training units.
- b. New supervisors shall receive a minimum of 40 hours of pre-service training on supervision of child welfare workers within three months of assuming supervisory responsibility.

31. Training for Previously Hired Workers, Supervisors and Administrators

- a. Previously hired workers shall receive annually a minimum of 5 full training days (or a minimum of 30 hours) of structured in-service training geared toward professional development and specific core and advanced competencies.
- b. Supervisors and administrators shall receive annually a minimum of 24 hours of structured in-service training.

32. Training for Foster Parents

- a. CFSA and contract agency foster parents shall receive a minimum of 15 hours of pre-service training.
- b. CFSA and contract agency foster parents shall receive annually a minimum of 15 hours of in-service training

33. *Quality Assurance*

CFSA shall have a Quality Assurance system with sufficient staff and resources to assess case practice, analyze outcomes and provide feedback to managers and stakeholders. The Quality Assurance system must annually review a sufficient number of cases to assess compliance with the provisions of the MFO and good social work practice, to identify systemic issues, and to produce results allowing the identification of specific skills and additional training needed by workers and supervisors.

34. *Special Corrective Action*

- a. CFSA shall produce accurate monthly reports, shared with the Monitor, which identify children in the following categories:
 - i. All cases in which there have been four or more reports of neglect or abuse for a single child or family with the fourth report occurring in the last 12 months;
 - ii. All cases in which a child has been placed in four or more different placements, with the fourth or additional placement occurring in the last 12 months and the placement is not a permanent placement;
 - iii. All cases in which a child has had a permanency goal of adoption for more than one year and has not been placed in an adoptive home;
 - iv. All children who have been returned home and have reentered care more than twice and have a plan of return home at the time of the report;
 - v. Children with a permanency goal of reunification for more than 18 months;
 - vi. Children placed in emergency facilities for more than 90 days;
 - vii. Children placed in foster homes or facilities that exceed their licensed capacities or placed in facilities without a valid license
 - viii. Children under 14 with a permanency goal of APPLA; and
 - ix. Children in facilities more than 100 miles from the District of Columbia.
- b. CFSA shall conduct a child-specific case review by the Director or Director's designee for each child identified and implement a child-specific corrective action plan, as appropriate.

35. *Performance Based Contracting*

CFSA shall have in place a functioning performance based contracting system that (a) develops procurements for identified resource needs, including placement and service needs; (b) issues contracts in a timely manner to qualified service providers in accordance with District laws and regulations; and (c) monitors contract performance on a routine basis.

36. ICPC

CFSA shall continue to maintain responsibility for managing and complying with the ICPC for children in its care.

37. Licensing Regulations

CFSA shall have necessary resources to enforce regulations effectively for original and renewal licensing of foster homes, group homes, and independent living facilities.

38. Provider Payments

CFSA shall ensure payment to providers in compliance with DC's Quick Payment Act for all services rendered.

39. Budget and Staffing Adequacy

The District shall provide evidence that the Agency's annual budget complies with Paragraph 7 of the October 23, 2000 Order providing customary adjustments to the FY 2001 baseline budget and adjustments to reflect increases in foster parent payments and additional staff required to meet caseload standards, unless demonstrated compliance with the MFO can be achieved with fewer resources.

The District shall provide evidence of compliance with Paragraph 4 of the October 23, 2000 Order that CFSA staff shall be exempt from any District-wide furloughs and from any District-wide agency budget and/or personnel reductions that may be otherwise imposed.

SECTION II: OUTCOMES TO BE MAINTAINED

A. PROTECTIVE SERVICES

1. Entering Reports into Computerized System

CFSA shall immediately enter all reports of abuse or neglect into its computerized information systems and shall use the system to determine whether there have been prior reports of abuse or neglect in that family or to that child.

2. Maintaining 24 Hour Response System

CFSA shall staff and maintain a 24-hour system for receiving and responding to reports of child abuse and neglect, which conforms to reasonable professional standards.

3. Checking for Prior Reports

Child abuse and/or neglect reports shall show evidence that the investigator checked for prior reports of abuse and/or neglect.

4. Reviewing Child Fatalities

The District of Columbia, through the City-wide Child Fatality Committee, and an Internal CFSA Committee, shall conform to the requirements of the MFO regarding the ongoing independent review of child fatalities of members of the plaintiff class, with procedures for (1) reviewing child deaths; (2) making recommendations concerning appropriate corrective action to avert future fatalities; (3) issuing an annual public report; and (4) considering and implementing recommendations as appropriate.

B. EMERGENCY CARE AND GENERAL ASSISTANCE

5. Policies for General Assistance Payments

CFSA shall have in place policies and procedures for appropriate use of general assistance payments for the care of children by unrelated adults, including provision of any applicable oversight and supervision.

6. Use of General Assistance Payments

CFSA shall demonstrate that District General Assistance payment grants are not used as a substitute for financial supports for foster care or kinship care for District children who have been subject to child abuse or neglect.

C. PERMANENCY PLANNING AND PLACEMENT OF CHILDREN

7. Licensing and Placement Standards

- a. Children shall be placed in foster homes and other placements that meet licensing and other MFO placement standards.
- b. Children in foster home placements shall be in homes that (a) have no more than three foster children or (b) have six total children including the family's natural children; (c) have no more than two children under two years of age or (d) have more than three children under six years of age. The sole exception shall be those instances in which the placement of a sibling group, with no other children in the home, shall exceed these limits.
- c. No child shall be placed in a group-care setting with a capacity in excess of eight (8) children without express written approval by the Director or designee based on written documentation that the child's needs can only be met in that specific facility, including a description of the services available in the facility to address the individual child's needs.
- d. Children shall not be placed in a foster care home or facility in excess of its licensed capacity. The sole exception shall be those instances in which the placement of a sibling group, with no other children in the home, shall exceed the limits.

8. Appropriate Permanency Goals

No child under the age of 12 shall have a permanency goal of legal custody with permanent caretakers unless he or she is placed with a relative who is willing to assume long-term responsibility for the child and who has legitimate reasons for not adopting the child and it is in the child's best interest to remain in the home of the relative rather than be considered for adoption by another person. No child under the age of 12 shall have a permanency goal of continued foster care unless CFSA has made every reasonable effort, documented in the record, to return the child home, to place the child with an appropriate family member, and to place the child for adoption, and CFSA has considered and rejected the possibility of the child's foster parents assuming legal custody as permanent caretakers of the child.

9. Post-Adoption Services Notification

Adoptive families shall receive notification at the time that the adoption becomes final of the availability of post-adoption services.

D. CASE REVIEW SYSTEM

10. Administrative Reviews

- a. By September 30, 2005, CFSA shall have implemented an Administrative Case Review process, as defined in Section X.B.1(a-c) of the MFO, with sufficient staff resources to review foster care cases within 180 days of a child's entry into foster care and every 180 days thereafter.
- b. Foster care cases shall have had an Administrative Case Review within 180 days of the child entering care and every 180 days thereafter. The Administrative Case Review process shall:
 - i. Be staffed by qualified social workers
 - ii. Provide advance notification to social workers, parents, foster parents, youth, Guardians ad litem, and involved service providers as appropriate
 - iii. Be efficiently and conveniently scheduled to ensure maximum participation of involved parties, especially parents, as appropriate
 - iv. Provide for a comprehensive review of case progress, the appropriateness of permanency goals and placement, and adequacy of services to meet permanency goals and to promote the safety, permanence and well-being of the child; and
 - v. Be structured to provide feedback to CFSA management on compliance with agency policies and procedures, District of Columbia law and the MFO

11. Permanency Hearings

CFSA shall make every reasonable effort to ensure that children in foster care have a permanency hearing in Family Court no later than 14 months after their initial placement.

**E. CASELOADS, STAFFING,
AND WORKER QUALIFICATION**

12. Use of MSWs and BSWs

Unless otherwise agreed, all social worker hires at CFSA shall have an MSW or BSW before being employed as trainees.

13. Social Work Licensure

All social work staff shall meet District of Columbia licensing requirements to carry cases independently of training units.

F. TRAINING

14. Training for Adoptive Parents

Adoptive parents shall receive a minimum of 30 hours of training, excluding the orientation process.

G. RESOURCE DEVELOPMENT

15. Needs Assessment and Resource Development Plan

- a. CFSA shall complete a needs assessment every two years, which shall include an assessment of placement support services, to determine what services are available and the number and categories of additional services and resources, if any, that are necessary to ensure compliance with the MFO. The needs assessment shall be a written report. The needs assessment, including the report, shall be repeated every two years. CFSA shall provide evidence of adequate Resource Development capacity within the Agency, with sufficient staff and other resources to carry out MFO resource development functions.

- b. The District shall develop a Resource Development Plan, which shall be updated annually by June 30th of each year. The Resource Development Plan shall: (a) project the number of emergency placements, foster homes, group homes, therapeutic foster homes and institutional placements that shall be required by children in CFSA custody during the upcoming year; (b) identify strategies to assure that CFSA has available, either directly or through contract, a sufficient number of appropriate placements for all children in its physical or legal custody; (c) project the need for community-based services to prevent unnecessary placement, replacement, adoption and foster home disruption; (d) identify how the Agency is moving to ensure decentralized neighborhood and community-based services; and (e) include an assessment of the need for adoptive families and strategies for recruitment, training and retention of adoptive families based on the annual assessment. The Plan shall specify the quantity of each category of resources and services, the time period within which they shall be developed, and the specific steps that shall be taken to ensure that they are developed. CFSA shall then take necessary steps to implement this plan.

16. Foster Parent Licensure

CFSA shall license relatives as foster parents in accordance with District law, District licensing regulations and ASFA requirements.

H. CONTRACT REVIEW

17. Maintaining Computerized System

- a. CFSA shall develop and maintain a unitary computerized information system and shall take all reasonable and necessary steps to achieve and maintain accuracy.
- b. CFSA shall provide evidence of the capacity of FACES Management Information System to produce appropriate, timely, and accurate worker/supervisor reports and other management reports that shall assist the Agency in meeting goals of safety, permanence and well-being and the requirements of the MFO.

18. Contracts to Require the Acceptance of Children Referred

CFSA contracts for services shall include a provision that requires the provider to accept all clients referred pursuant to the terms of the contract, except for a lack of vacancy.

19. Federal Revenue Maximization

CFSA shall demonstrate compliance with Sections A and B of Chapter XVIII of the Modified Final Order concerning federal revenue maximization and financial development.

20. Foster Parent Board Rates

There shall be an annual adjustment at the beginning of each fiscal year of board rates for all foster and adoptive homes to equal the USDA annual adjustment to maintain rates consistent with USDA standards for costs of raising a child in the urban south.

**SECTION III:
2007 STRATEGY PLAN TO ACHIEVE CRITICAL SAFETY,
PERMANENCE AND WELL-BEING OUTCOMES**

CFSA will implement the following Annual Strategy Plan with identified action steps designed to achieve safety, permanency and well-being for children and to reach and sustain the performance goals of the Amended LaShawn Implementation Plan (AIP). The strategies and actions steps in this plan are in critical areas related to outcomes, including placements, investigations, visitation, case planning, and health and mental health services.

The Parties agree that the Defendant's Strategy Plan and actions steps are a means to achieving compliance with the required outcomes. The action steps are enforceable by the Court but can be changed or deleted with the approval of the Court Monitor. The Strategy Plan will be updated annually in consultation with the Plaintiffs and the Court Monitor and is subject to approval by the Court Monitor.

A. GOAL: CHILD SAFETY

1. Action Steps to Improve Child Protective Services

- a. Caseloads. CFSA will continue "overstaffing" in Child Protective Services (CPS) to maintain low investigator caseloads (not to exceed 1:12) and/or support creation of an assessment unit. Supervisors will assign new investigations to investigators according to a rotational schedule that includes two consecutive off-rotation days. Ongoing.
- b. Management. CFSA will maintain twice-daily screening panels to ensure those cases appropriate for investigation are accepted and that the Assessment Unit will evaluate allegations that may involve issues other than abuse or neglect. Ongoing.
- c. Hotline. The Hotline Supervisor and Program Manager will review regularly the Hotline recording system tapes to assess individual Hotline worker performance as well as overall Hotline functioning, and will implement improvements as needed. Ongoing.
- d. Quality of Investigations. CFSA workers will use **Structured Decision Making (SDM[®])** to assess child safety and family risk levels during investigations and throughout the life of a case. All families at low or moderate risk of abusing or neglecting their children will be referred to the Healthy Families/Thriving Communities Collaboratives for intervention and support designed to prevent entries into foster care. CFSA will review FACES reports to monitor workers'

contacts with collateral contacts during an investigation. See also section below on quality assurance. Ongoing.

- e. CPS training – CFSA will develop training curricula and provide training to address supervisory training needs as well as line worker training needs. Training will include forensic interviewing skill development for workers in the special abuse and institutional abuse units and documentation and critical thinking in child welfare assessment for all CPS workers. Complete by December, 2007.

B. GOAL: PERMANENCE

1. Action Steps to Enhance Placement Capacity

- a. Create appropriate placement capacity:
 - i. MTFC. CFSA will contract for family-based Multidisciplinary Treatment Foster Care (MTFC) for 20 youths with serious to severe emotional and behavior problems. Services available by May, 2007.
 - ii. Teen transitional services. CFSA will create 16 teen bridge services placements for older youths not yet ready to live independently but too old for traditional group homes. Services available by June 30, 2007.
 - iii. Placements for special-needs children. CFSA will award contracts to provide placement and supportive services to 40 children with serious medical and/or developmental disabilities. One contract will be for twenty new foster home beds; the second will be for 20 congregate care beds that are already available but are covered by a sole source contract, so the net gain will be 20 special needs placements. July, 2007.
 - iv. Placements for teens and large sibling groups: CFSA will develop and implement a plan with timelines to develop strategies regarding placement of teens who repeatedly experience disrupted placements and placement of large sibling groups. Plan with time frames for implementation developed by April 30, 2007.
 - v. STAR emergency beds: Create 4 additional emergency foster home beds in D.C. Maintain a total capacity of 10 STAR placements by March, 2007.
- b. Media campaign to create new foster and adoptive resources. CFSA will continue efforts to increase community awareness of the need for foster parents and to increase calls to the recruitment line. CFSA will launch a recruitment campaign to address sibling groups of all ages. CFSA will work with True Insight

Marketing through the Annie E. Casey Foundation to help address recruitment and retention and will implement the Adoptive and Foster home recruitment plan previously developed and submitted to the Court Monitor. Ongoing.

- c. Family Team Meetings. CFSA will conduct a Family Team Meeting (FTM) whenever a child is at risk of removal, has been removed from home, is removed from his/her current placement, or is at risk of placement disruption. CFSA will develop and implement FTM plan that includes how FTM will be used to inform the case planning process and shall develop a system to assure the implementation of case planning steps and the delivery of service needs identified in the FTM. Placement FTMs will be conducted within three days in cases of removals and Replacement FTMs before the placement disrupts. Where a placement has already disrupted or a child returns from abscondence, an FTM will be held within 7 days. Ongoing with a date for full implementation by December 31, 2007.

2. Action Steps to Reduce Multiple Placements and Improve Stability

- a. Improve interagency coordination. District leadership will convene a summit on increasing permanency and placement stability for youth in multiple systems that includes representatives from CFSA, DMH, DHS, DOH, Family Court, City Council, Court Monitor, placement providers, foster parents, Citizen Review Panel, the Collaboratives, youth, Casey Programs and others. CFSA and its partners will develop and execute agreements based upon strategies developed during summit. September 2007.
- b. Seek technical assistance from AECF, Casey Family Programs and/or national resource centers. CFSA will obtain technical assistance and develop work plan that restructures service system for youth, and creates a strong placement and service continuum that meets the needs of youth and strengthens permanency. February, 2007 and ongoing. Work plan developed by April 30, 2007.
- c. Family Finding/ Youth Connections. CFSA will implement Youth Connections to identify people who will remain permanent connections for youth and augment it with Family Finding, to identify extended family members with whom committed youth may have not had contact since they entered care but who may be interested in establishing permanent relationships. Training and pilot phase to begin by March, 2007, plan developed by April 30, 2007 with implementation by December, 2007.
- d. Enhance and target foster parent training and retraining and support. CFSA shall obtain technical assistance for skill building relating to recruiting the right mix of foster parents and in general recruiting, developing and supporting resource families. Assistance will be obtained in designing an effective campaign to meet CFSA recruitment and support needs. CFSA will continue pilot test of

Mockingbird Model for some CFSA homes and evaluate the results. A full time social worker will be assigned to support STAR homes. February 2007 and ongoing.

- e. Implement Levels of Care approach to foster parent reimbursement rates. Implement the Child Needs/Provider Interventions assessment instrument, a tool which social workers and foster parents complete together to identify a child's needs and the interventions/services they require and then which is rated by an independent reviewer who will match it with a pre-established actuarial scale of reimbursement rates based on identified needs. Implement in summer 2007 for CFSA case-managed children with beginning implementation in private child placement agencies by October, 2008. 2007 accomplishments will include development of the weighted rating scale and schedule of rates, development of training materials for foster parents and social workers, and the necessary FACES build.
- f. Expand placement with kin. CFSA will identify and reduce barriers to temporary licensing with kin in the District and continue work with Maryland concerning kin placements. CFSA will create specific kinship support resources to include: targeted in service training, dedicated kin foster parent support workers, access to respite services and to in home support services. CFSA shall publish an emergency amendment to foster home rules that will allow the Director, upon written application and for good cause, to waive foster home rules that do not adversely affect child safety. April, 2007 and ongoing.
- g. Acquire more specific data on the issue of multiple placements. CFSA will develop capacity to produce reliable cohort data in FACES; complete study of the experiences of girls 15-17 years old and develop and begin implementation of strategies that address the results of Fall 2006 QSRs that focused on teens. The teen and sibling placement work plan will include action steps to address multiple placements. Complete by December, 2007.

3. Action Steps to Enhance Case Practice

- a. Maintain caseloads at the following levels:
 - i. The caseload of each worker² conducting investigations of reports of abuse and/or neglect shall not exceed the MFO standard, which is 1:12 investigations.

² All requirements apply to both CFSA workers and private agency workers. All CFSA contracts with private agencies providing foster care services shall include performance expectations for visitation of children in foster care in compliance with MFO visitation requirements.

- ii. The caseload of each worker providing services to children and families in which the child or children in the family are living in their home shall not exceed 1:15 families.
 - iii. The caseload of each worker providing services to children in placement, including children in Emergency Care and children in any other form of CFSA physical custody, shall not exceed 1:15 children for children in foster care.
 - iv. The caseload of each Permanency Specialist shall not exceed 30 children with the goal of adoption/guardianship. An implementation assessment shall be completed to determine effectiveness.
 - v. The caseload of each worker having responsibility for conducting home studies shall not exceed 30 cases.
 - vi. There shall be no cases unassigned to a social worker for more than five business days, in which case, the supervisor shall provide coverage but not for more than five business days.
- b. Improve in-home practice. CFSA will develop and implement an in-home case practice model that reflects Agency practice model and that articulates specific expectations and protocols for serving children and families within their homes, and strengthens capacity of birth families to keep their children safe at home and provide adequately for their needs. June, 2007.
 - c. Use Data to Track Worker visits and case plans. Supervisors will use worker specific data to monitor visits and case plans. Ongoing.
 - d. Case planning. Using outside consultants, CFSA will train staff on the teaming process with families for development and implementation of case plans. September 30, 2007.
 - e. Creation of Permanency Specialists. CFSA will implement a model of permanency specialists who work with out-of-home care social workers to support concurrent permanency planning from the time a child enters foster care through reunification, guardianship, adoption, or living independently. Implementation of a pilot is underway and an evaluation of the redesign will run concurrent to the pilot. Ongoing.
 - f. Child specific recruitment staffings. CFSA will use contract agencies (i.e. Spalding) for child specific recruitment when initial recruitment efforts are not successful. Grant funds will be used to hire a specific recruiter that will use non-traditional recruitment methods for hard-to-place children. Ongoing; Child-specific recruiter to be hired by April 15, 2007.

- g. Development of post-permanence services. CFSA will create an array of post-permanency services including mental health services for children and youth and support services. Ongoing.

C. GOAL: CHILD WELL-BEING

1. Action Steps to Meet Children's Health and Dental Needs

- a. DC Kids Contract. CFSA will execute a new contract with DC Kids to include a community-based DC KIDS clinic for pre-placement medical and behavioral screenings and a comprehensive Early and Periodic Screening, Diagnosis, and Treatment (EPSDT) examination within 30 days of entering care, care coordination and appointment scheduling and technology enhancements to ensure data transfer between CFSA and DC KIDS to capture fully the services children receive. Contract effective May 1, 2007; Implementation ongoing.
- b. Access to child's prior medical history. District of Columbia will implement new legislation that requires health professionals and others to provide access to medical records immediately upon request. Ongoing.
- c. Improved information exchange with MAA. CFSA will collaborate with MAA and the MCOs to develop a tracking and monitoring process that will provide the MCOs with alerts that youths under their care are receiving services from CFSA. CFSA will collaborate with MAA to determine the feasibility of CFSA's access to MAA's EPSDT registry, to learn from MAA whether a child receiving services from CFSA is current in the EPSDT examination. CFSA will ensure OCP staff have access to and are trained on the SPIS system. Ongoing; Feasibility assessment completed by August 31, 2007. SPIS training completed by April 1, 2007.
- d. Closing gaps in dental services. CFSA will finalize arrangements for services with "Small Smiles", a dental clinic in DC that serves Medicaid children ages 3 to 20 and includes Bilingual staff of dentists, hygienists and dental assistants. Assess capacity and develop and implement a referral process by March 31, 2007. Implementation by March 31, 2007.

2. Action Steps to Enhance Capacity of Mental Health Providers, Expand the Service Array and Improve Children's Mental Health Services Infrastructure at the Department of Mental Health

- a. Complete needs assessment of CFSA-involved children and youth's mental and behavioral health needs by March 31, 2007 and utilize the results to identify any additional specific service needs and enhancement strategies. Analysis will include whether Medicaid dollars can be used to fund identified services within the DMH MHRS structure and the amount of local dollars that are required to support the needed, non Medicaid-eligible services. Needs assessment by March 31, 2007; Plan to implement the Needs Assessment to be developed by May 15, 2007.
- b. Issue a Request for Information (RFI) for a dedicated network of 3-5 mental health providers to provide court ordered mental health assessments and meet service needs as identified in the needs assessment of CFSA clients/parents in the District of Columbia and Maryland. Providers will serve children in CFSA's custody and their parents and will be funded through MHRS dollars. Children and parents served by CFSA but not in its custody will be served by Medicaid managed care organizations (MCOs); with MAA, we will ensure the MCOs are prepared to serve children and families 24 hours/7 days per week. August 31, 2007.
- c. Amend DMH clinical criteria for prior authorization to provide that every child discharged from a psychiatric hospitalization or who experienced more than two placements in one twelve month period will qualify for community and home-based interventions through DMH's community-based intervention services. March 1, 2007.
- d. Ensure access to Automated Client Eligibility Determination System (ACEDS) by CFSA Behavioral Services to determine the name of the assigned MCO for the parent or the child upon entry into care to begin to access existing linkages early. March 1, 2007.
- e. Develop and implement community alternative wrap around services for District youth at risk for an out of home Residential Treatment Center (RTC) placement and for CFSA youth that have experienced multiple placements and/or hospitalizations. Medicaid State Plan Amendment will be submitted to CMS by September 30, 2007 and implementation will follow CMS approval.

- f. Develop crisis intervention services to support and stabilize a child's placement (in-home or in foster home) as follows: 1) by May, 2007, make available to foster and birth parents 1:1 support services by behavioral specialists and provide up to 3 days respite care; 2) by July 1, 2007, develop statement of work, budget and propose funding source and implementation steps for crisis intervention services program to be operational for FY 2008.
- g. Establish additional staffing at DMH to support enhanced children's mental health services to include a) systems coordinator/program manager for Medicaid eligible and non-Medicaid eligible services; b) a program analyst to analyze data and program effectiveness; c) CBI coordinator; d) A staff to coordinate all referrals from CFSA within the public mental health system in collaboration with the CFSA Behavioral Services Unit; and e) 1 psychologist and 1 clinical social worker to be assigned to CFSA's child protection unit under the direct supervision of CFSA's Behavioral Services Unit. DMH will review its staffing allocation to determine its current resource capacity and determine amount of additional funding, if any, needed for these positions. Plan completed by March 31, 2007 with staff to be hired no later than July 1, 2007.
- h. Issue RFP for Hurt Home for residential services for children ages 6-12 and for other specialized day programming. February 5, 2007 with expectation of contract for services by June 1, 2007.
- i. CFSA to determine the amount of funding needed to be maintained in CFSA budget for FY08 to purchase mental health services needed for CFSA-involved children and families and not available through DMH provided or contracted resources. Prior to FY 08 budget development.

D. GOAL: SYSTEM ACCOUNTABILITY

1. Continue Administrative Reviews, internal Fatality Reviews, and special studies of internal service delivery (sometimes done collaboratively with the Center for the Study of Social Policy). CFSA will implement monthly QSRs throughout the agency at the unit level in spring, 2007, share results and recommendations agency wide across the agency, and conduct agency-wide QSR annually. Ongoing.
2. Establish a Continuous Quality Improvement (CQI) system that engages both staff and external stakeholders in reviewing and improving practice. CFSA will update the Quality Assurance Plan completed in 2004 to incorporate specific outcomes and indicators for measuring them, building on practice standards in the Amended Implementation Plan. CFSA will develop a work plan and timetable that incorporate concrete strategies for embedding a CQI approach into the culture of the agency; an assessment of resources needed and a strategy to identify and provide those resources; engage external partners and stakeholders in CQI; include training for all participants; use existing and new quantitative and qualitative data for review and analysis; and systematically use results to improve policy, practice, and programs. CFSA will share reports and other results of these efforts with the public via our website. Revised QA Plan by April 30, 2007. Implementation ongoing.
3. Complete training on the flexible fund policy by March 1, 2007 and utilize requests made during the last six months of 2006 to project amount of 2008 fund. March, 2007 and ongoing.
4. Performance monitoring of private agencies CFSA will continue the use of Scorecards to monitor performance in the private agencies. Contracts with private agencies will include financial incentives and disincentives tied to performance, and CFSA will take all steps necessary to enforce the terms of private agency contracts, including the use of financial incentives and disincentives tied to performance. On-going.