

FAQ's

Child Welfare Quality Assurance Review Guidelines QA Regional Model Frequently Asked Questions

Child Protective Investigations

1. Question: The guidelines currently require Child Protective Investigations Supervisors to conduct the Mentoring and Modeling for Quality (supervisory discussion process) on three investigations per month, per Child Protective Investigator. Is there any leeway to change this to three investigations per quarter?

Response: The minimal requirement currently remains at three qualitative discussions per month, per investigator. Mentoring through reflective discussion that encourages critical thinking between the supervisor and investigator is a very effective way to build skills and assure quality services are being provided to the children and families being served. As this process becomes more ingrained into everyday operations, the requirements may be revisited to allow supervisors to make their own judgments as to which staff need more and which need less mentoring.

2. Question: Who is responsible for quality control of the completed tools?

Response: Ultimately the QA Managers must assure that the data being submitted accurately reflects the findings.

3. Question: For CPI Standard 1.3, can a "9" rating be given if the report did not indicate "other" children lived in the home, but as the CPI became aware of "other" children after initiating the investigation, CPI saw them within 24 hours after the fact?

Response: If "other" children were not named in the report, the reviewer should indicate the standard was achieved if the CPI made contact with them after learning they exist.

4. Question: For CPI Standard 1.5, does this mean that the mother and/or father are required to be interviewed even when they are not named in the report?

Response: Interviews are to be conducted with all subjects of the report and with all household members. Even though mother and/or father may not be named in the report, if the CPI finds they are in the home, they must be interviewed and a determination made as to whether he/she should be added as subjects of the report.

5. Question: For CPI Standard 1.9 how do you rate non-custodial parent interview if he/she is hostile toward custodial parent?

Response: Reviewer would need to assess content of interview, were maltreatments discussed and other issues relevant to assessing child safety and parent's protective capacities sufficiently addressed?

6. Question: For CPI Standard 1.11, who qualifies as the "professional" in this standard?

Response: The standard is intended to capture contact with professionals involved with the child and family other than the CPT, who may have previously or during the current investigation, performed other assessments or provided therapeutic treatment services.

7. Question: For CPI Standard 1.12. 1, are we to assume if there is a court order a legal staffing occurred?

Response: Not necessarily. There may be a court order based on a petition filed by someone other than Children's Legal Services and not the result of a staffing by the child welfare agency. Reviewers must use professional judgment if there is supporting documentation that at least to some degree, a staffing was held with legal services.

8. Question: For CPI Standard 1.19, is there any consideration being given regarding sufficient time to conduct an early services intervention staff to be effective?

Response: Given the 60 day time frame in which to complete an investigation, this may not be within the CPI's control and may become a case management concern, however, the reviewer is encouraged to use professional judgment in rating this response which for the current year is a data gathering effort.

9. Question: If there is only initial supervisory guidance and no on-going, how should that be considered, particularly if there were missed opportunities for on-going supervisory guidance?

Response: Reviewers must use professional judgment in rating this standard and consider the content of the investigation and current safety issues. If in doubt, the reviewer should consult with the team lead for additional guidance.

10. Question: For CPI Standard 2.4.1., how many years back should out-of-state background checks be conducted?

Response: Reviewers should consider the nature of the investigation and/or reasons an out-of-state background check is needed, i.e, sexual abuse victim being placed with a relative who has lived in Florida for only 10 years. CPIs should conduct an out-of-state

on any serious maltreatment where safety may be comprised without knowing the out-of-state history.

11. Question: For CPI Standard 2.6.1, how do you rate the standard if the child was referred timely, however, the provider was unable to see the child within 72 hours?

Response: The reviewer should look for a documented reason the provider was unable to complete the screening within 72 hours and determine if this a systemic factor (resource need unmet), but must still simply address whether the standard was met or not regardless of resource issues.

12. Question: If a maltreatment is verified and a supplemental report is received 29 days later where the maltreatment is "some indicators," does this constitute reabuse even though it is in the same report?

Response: It would not be "counted" as a reabuse if the newer allegations were considered to be a part of the same investigation (even as a supplemental report) prior to closure.

13. Question: Standard #1.5 instructs the reviewer to consider the non-custodial parent a relevant collateral contact. Additionally, one of the ratings directs the reviewer to document "NA" if the mother, father or alleged caretaker responsible did not live in the home and was not a subject of the report. I understood the law required the CPI to contact both parents if their whereabouts is known or the parent can be located to advise about the investigation and explore whether the parent has any information regarding the investigation. With the current guidelines it appears we are no longer requiring the non-custodial parent to be contacted, but if contacted the reviewer should consider the non-custodial parent a relevant collateral contact. I'm concerned with the current guidelines there is no place to address the failure to contact the non-custodial parent about an active investigation.

Response: Statute and rule refer to parent(s) in the context of "household members or family composition." Neither statute nor code specifies that the CPI must contact a "non-custodial" parent in all investigations if they are not a subject of the report, which is why the development team chose to stipulate that under those circumstances, the non-custodial contact should be considered a relevant collateral contact. Rule does provide direction when 1) a non-custodial parent is the alleged abuser (which then makes him/her a subject of the report) and so would be addressed in the interview with caretaker responsible section, and 2) when the custodial parent has been determined to have abused or neglected the child and so the non-custodial parent must be contacted in order to assess their willingness and/or ability to protect the child from the custodial parent.

14. Question: Standard #1.12.1 states a CLS staffing is required for a number of reasons, including to staff for the purpose of (4) determining whether there is legal

sufficiency to file a shelter or dependency petition. If the supervisor directs the CPI to staff the case with CLS, but it does not meet the first three reasons and presumably is to address the fourth reason, do you penalize here if not done, and again later for not following through on supervisory direction (1.27). I'm always uncomfortable with double dinging for the same action or inaction.

Response: Standard #1.12.1 is specific to the CPI knowing a staffing with CLS was needed based on any of the 4 reasons given, and he/she arranged for and participated in a CLS staffing. If the CPI did not, but should have, staffed the case with CLS and upon supervisory review was actually told to do so, then 1.27 should focus on whether the supervisor's specific directions were followed even albeit after the fact but before closure. So, if the CPI should have, but didn't, the rating for 1.12 is "O," but if it occurred at the supervisor's direction in 1.27 then you have to rate accordingly.

15. Question: Standard #1.12.2 asks if a dependency petition was filed or a valid reason for not pursuing dependency was documented when the CLS staffing documented legal sufficiency. Do we only note disagreement when the attorney notes there is legal sufficiency and a petition is not filed or do we note disagreement when the attorney documents there is no legal sufficiency and we believe there was. I'm finding an ever widening gap between what we (QA) believe constitutes legal sufficiency and what the attorneys believe constitutes legal sufficiency. Since they are the attorneys I think they are going to feel they should get to make this call! If this is our call I would appreciate some training on this from Mary Cagle.

Response: FSQA will invite Ms. Cagle to address this issue at our next QA Manager's meeting in November. A new standard may be appropriate that states, "Based on the evidence gathered, when the CPI believed there was legal sufficiency to deem the child dependent, but CLS disagreed, documentation reflects the matter was referred to upper management for conflict resolution."

16. Question: For Standard #1.16, we have applied the exception requirement to cases that should have a face-to-face medical evaluation, but the CPT takes as a consult. I don't see anywhere in the guidelines the CPT's decision to take a mandatory referral as a consult still has be approved as an exception by the CPI Supervisor. Wouldn't we want the CPI Supervisor to concur with this exception?

Response: The following language will be added in the rating options. "Document "9" if the supervisor appropriately concurred with CPT's decision to treat a mandatory referral as a consult based on the evidence gathered during the investigation." And, "Document "o" if there is no evidence that the supervisor concurred with CPT's decision to treat a mandatory referral as a consult based on the evidence gathered during the investigation." Even though it is technically CPT that is making the exception to the requirement for a face-to-face exam, documentation should reflect that it was approved by the supervisor.

17. Question: In the removal section, Standard 2.2.1 asks if the investigation documented a completed form 1000. Standard 2.2.2 asks if the checklist was completed if the child was reported to be a member of a tribe or was eligible for a tribe. Standard 2.2.3 asks if the search process was timely initiated. 2.2.4 asks if the court was advised if the child was determined to be a member of a tribe or eligible to be a member. It doesn't make sense to me to address exploration of Native American or Alaskan Native heritage in both 1.25 and again 2.2.1. Should the earlier question be NA'd if the investigation involved a removal? Also, wouldn't we NA 2.2.1, 2.2.2, 2.2.3, and 2.2.4 if the issue was not explored in either 1.25 or in 2.2.1?

Response: No, standard 1.25 is a stand alone question during an investigation as the **inquiry** must be made and documented in all investigations per federal requirements and F.A.C. Standard 2.2.1 is duplicative, but it offers another opportunity for an appropriate inquiry that now becomes especially important because the child has been removed. The following standards in the removal section then represent completion of checklists and other processes that must be completed when heritage is established.

18: Question: Does the ICWA question apply in an institutional investigation?

Response: Since F.A.C. 65C-29.003 requires a determination be made in **all** investigations, QA would interpret that to include institutionals. To comply with federal and F.A.C. requirements, QA's position is that CPIs should always ask the alleged victim if they are of American Indian or Alaskan Native descent **AND** CPIs should always contact the parent (even though the abuse/neglect is alleged within the institution the parent has a right to know what's happening with his/her child) asking again if they are of American Indian or Alaskan Native descent as the response may impact future placement decisions.

19. Question: Should supervisors maintain separate files on staff to document and maintain supervisory discussion activities?

Response: Any file labeled with an individual employee's name, regardless of content, is considered a "personnel file" and cannot be maintained separately in the supervisor's office if the same file or information therein is also not maintained in the applicable HR office. It is permissible to maintain a folder labeled other than the individual's names as long as it contains information regarding more than one person.

Case Management

1. Question: Should the Mentoring and Modeling for Quality in case management specify every 90 days versus every quarter? For example, the first quarter review may occur July 1, but the second quarterly review may not happen until December 31.

Response: The expectation is that supervisory reviews occur each quarter, but certainly not as described above. The intent is to have frequent, meaningful, and timely discussions with staff. Given the scenario above, six months would have passed between discussions and that is not acceptable. Reviewers should use a logical, common sense approach to assessing this process based on the understanding that supervisory reviews should occur regularly, but at a minimum approximately every 90 days.

2. Question: Who tracks which children were reviewed in previous quarters?

Response: The guidelines were amended to reflect this is the responsibility of the CBC QA Manager. However, program office will determine if the duplicated children can be removed from the extract by the programmers.

3. Question: What is the logic for not being able to stratify the sample by service provider or In-Home and Out-of-Home and percentage of cases handled by Case Management Organizations (CMO)?

Response: The sample is too small to stratify by provider or percentage of cases handled by CMOs, however, the guidelines were amended to allow a stratification if the sample is extremely skewed relative to In-Home and Out-of-Home. In addition, keep in mind the reviews are meant to be a system of care review and not a review of an individual unit or provider. The CBC's contracted organizations have the ability to conduct more focused reviews as needed.

4. Question: How can one say that review findings are representative of the total population when the sample is so small?

Response: The minimum required review of 25 cases per quarter that are identified through specific sampling criteria will offer the regions and CBCs some global observations of their performance overall. CBCs are not limited to a review of 25 cases per quarter and should plan for ongoing and continuous review based on the data that is gleaned from performance measure reporting as well as findings from 25 case file reviews.

5. Question: Should runaways/missing children be included in the review sample?

Response: Yes

6. Question: What is the time frame for the Base Report in relation to the Exit Conference?

Response: The Base report must be completed prior to the Exit Conference as the findings from that portion of the quarterly review process are included in the presentation of preliminary findings.

7. Question: Who is responsible for quality control of the completed tools?

Response: Ultimately the QA Managers must assure that the data being submitted accurately reflects the findings.

8. Question: How are findings in the Side-by-Side reflected when interviews contradict the documentation in the file?

Response: The standards are rated based on the documentation in the file. If information obtained from interviews with case specific parties during the in-depth process contradicts the documentation in the file, reviewers will make note of such discrepancy and include the information in the report, but it should not change the rating response.

9. Question: Does case management standard #4.0 apply to post-placement supervision?

Response: No, post placement is covered in the preventing re-entry standards.

10. Question: Will the new FSFN six-month assessment meet case management standard #7.0?

Response: The format in FSFN can be used to address the question, but the reviewer is to look for quality not just that the format indicates an assessment was done.

11. Question: For Case Management Standard 7.0, previously the JRSSR was accepted as a form of documenting the six-month assessment. Is this still the case?

Response: If the JSSR documents a case plan update and clearly reflects a thoughtful assessment process occurred, reviewers should consider the standard is met.

12. Question: If a court orders reunification without CBC's recommendation and if the home is out-of-county or state and a home study cannot be completed "immediately," how would a reviewer rate Case Management Standard 9?

Response: The reviewer should look for documentation that the case manager made concerted efforts to conduct an assessment prior to the physical reunification. If circumstances were beyond case management's control, the reviewer should note the reason one was not conducted prior to reunification, but indicate the standard was not met.

13. Question: For Case Management Standard 52.0, does child's placement in a residential facility for the review period excuse the need for efforts to assess ongoing services for the family?

Response: No, the standard addresses services to the family when a child is in out-of-home care (except TPR's) regardless of setting. The reviewer would need to determine if the family continued to be assessed for service needs to reach the permanency goal.

14. Question: For Case Management Standard 66.0, will this rating be the result of a "roll-up" of previous questions, or will it be a reviewer's judgment?

Response: This is not a "roll-up" per se but it does ask the reviewer to sit back and reflect on all of the information gathered during the review process and offer a professional assessment of the work performed and its likelihood to being successful.

15. Question: For Case Management Standard 41.0, federal and state requirements do not require a **judicial determination** be made on exceptions to TPR petitions, rather that the child welfare agency document that they have reported thus to the court as documented in a court report (JSSR) or "permanency plan." Writer is concerned that the way the "Yes" rating is worded, reviewers may give a negative response if there is no actual court order documenting a **judicial determination**.

Response: The intent of the standard is to assess **IF** the child welfare agency did not file a TPR petition, did they clearly specify a justifiable reason for not having filed one? The child welfare agency must document that they have reported to the court why a TPR petition was not filed, but they would **not be accountable for an actual judicial determination**. The "Yes" rating will need to be modified in the next version.

16. Question: For Case Management Standard 22, instructions indicate this standard is applied to all cases, but the reference is Permanency. It does not seem appropriate to ask this question in In-home cases as these cases have no relationship with the Permanency outcomes. Isn't there a risk of mixing the data if you ask the same question for In-Home and Out-of-Home cases?

Response: Services cases (regardless of In-Home versus Out-of-Home) must have a **case plan** goal. Reviewers are asked to assess the appropriateness of the goal in case reviews as to whether the goal reflects the family's circumstances. In the example of an

In-Home case, the reviewer must consider if Maintain and Strengthen is an appropriate goal based on the information presented. Even this goal (Maintain and Strengthen) ties to a child's permanency, i.e, preventing them from entering care in the first place and/or supporting reunification. Based on that logic the standard will continue to reference Permanency. However, once the data is collected, In-Home cases could be separated from the overall data if needed.

17. Question: For Case Management Standard #33, why is case management being assessed for compliance with the Indian Child Welfare Act as to make additional inquiries about a child's Native American or Alaskan Native heritage? CPI's are required by Florida Administrative Code to ask about heritage in all investigations.

Response: While it is true that written policy requires investigations staff to inquire if a child is of Native American or Alaskan Native descent in all investigations, it is also extremely important that case management explore the possibility as well; otherwise, the system risks jeopardizing the timely achievement of permanency if heritage is only explored late in the judicial process.

For instance, in a recent case, during the adoption process, a child was found to be of Native American heritage, but neither investigations nor case management made any prior inquiries to that effect.

18. Question: For Case Management Standard 4.0, does this apply to post-placement supervision cases?

Response: No, post-placement is covered in the preventing re-entry standards.

19: Question: Should an 18 year old Independent Living youth be removed from the sampling list.

Response: No, even though many standards may not apply, there are several standards specific to Independent Living that need to be assessed.

20: Question: In reference to Standard #33, I know HQ is discussing this one in reference to the outdated Form 1000, however, I think when the exits are conducted it should be acknowledged that this question is making a difference in the data (since it is mostly a NO considering the specificity of the requirement).

Response: The updated version of the standards for the second quarter will reflect response options more accurately since the Form 1000 is out of date.

21. Question: In this scenario, reviewers found the file did not have a current case plan, but the child left out-of-home care and returned home under post-placement supervision. If it is apparent that the case plan goal was appropriate, that is

reunification (or maintain and strengthen upon reunification), can you answer Standard #22 as a positive if the reviewer could figure out from the record what the goal was even if there was no case plan?

Response: No, if the case plan was expired or non-existent, the standard was not met as it is directly related to the existence of a case plan. It would not be appropriate to rate the standard as achieved based on the reviewer deducing from the present circumstances, that the goal was appropriate.

22. Question: Related to question # 38, if the **expired** case plan accurately reflects the current visitation plan, would a reviewer answer Yes to Standard #23 or is this also a No? For Standard #24, if the case plan tasks remain the same or the case plan has expired but the goal remained the same, would you answer Yes, or is this also a No because the case plan has expired. Regarding Standard #53, if there is evidence the case plan participants participated in the development of a case plan that has not been filed timely would you answer Yes or is this also a No?

Response: If there is only an expired (or no) case plan, then there is NO case plan to assess in the subsequent standards. The NA options for those related to Standard #21 (that is, 22, 23, and 24) were put in so reviewers would not find fault over and over again when the agency failed to do the one thing that the other standards are based upon.

As to #53, this standard looks at a different set of circumstances other than if there is a current case plan, so it is evaluated separately. If there is evidence the family was actively involved in the process – regardless of timely filing, or current or not – one can justify a Yes response, giving credit where it is due.

23. Question: Should supervisors maintain separate files on staff to document and maintain supervisory discussion activities?

Response: Any file labeled with an individual employee's name, regardless of content, is considered a "personnel file" and cannot be maintained separately in the supervisor's office if the same file or information therein is also not maintained in the applicable HR office. It is permissible to maintain a folder labeled other than the individual's names as long as it contains information regarding more than one person.

24. Question: Should an exit interview be conducted with an age appropriate youth when he/she was moved from one group home to another even if the group homes are overseen by the same provider? The move changed the youth's physical environment, cottage parents, housemates, the county where he resided plus the school he attended.

Response: Yes, it is imperative to conduct exit interviews in this situation.

25. Question: The 2008 Regional QA Model implies that CBCs have the entire quarter to conduct their 17 Base Reviews. Why does program office continually assert that these 17 reviews should be completed earlier in the quarter, and that they should be conducted on site in a team environment?

Response: The 2008 model was designed to ensure qualitative CBC internal review and data analyses that uses a windows-into-practice approach intended to give CEOs important information about current practices that helps guide his/her attention in reacting to problem areas in real time. There is no data to support that completing a couple of reviews intermittently throughout the quarter can achieve this windows-into practice effectively.

Most successful Quality Assurance monitoring systems use a team approach to reviewing a product that is structured as an actual event with a begin time and end time. Using a team approach, even if only two people make up the team, and defining a specific period of time in which their attention is solely focused on completing the monitoring, offers a more comprehensive and cohesive view of the overall system of care. This approach has been validated as an effective tool for managers to react to.

In addition, the model consists of sub-parts of which the Base Reviews is one; side by sides and in-depths are two others. Each sub-part connects in some way with the other. CEOs and Regional Directors need to know preliminary findings in an exit conference, and each of the three sub-parts are a part of the overall information provided, so each needs to be completed beforehand. All pieces should come together as one informative process, albeit two separate reports.

26. Question: Standard #13 asks if a placement is stable and appropriate, however, the requirements and instructions language only address stability. Should reviewers consider both aspects?

Response: Yes, the qualitative nature of the standard requires the reviewer to consider the stability of the placement, as well as whether the placement is appropriate based on the child's needs and the family's ability to meet those needs while assuring child safety and well-being.

27. Question: Regarding Standard #17, is an exit interview required under the following circumstances? A youth was living in a licensed setting. He was arrested and spent two weeks in jail. During the time the youth was in jail, he "aged-out." Current instructions for this standard indicate an exit interview is required when a child goes from one placement to another. Is jail considered a placement which would then invoke the requirement for an exit interview?

Response: Chapter 65C-29.017 F.A.C., requires an exit interview on any child who "leaves a licensed out-of-home placement if the child resided in that placement for

thirty days or more." Therefore, in this case, assuming the youth lived in the placement over thirty days, an exit interview should have been done regardless that he left the placement to serve time in jail. However, the standard is written as "moved from one placement to another, so for this specific scenario the standard should be rated as an NA pending revisions to instructions.

28: Question: Case Scenario: In the beginning the focus child and three half-siblings resided with the mother and stepfather. Prior to the review period a motion for a change of placement was granted and the focus child was moved from the mother's custody to the father and remained in the father's home in in-home care for the entire period under review. The three half-siblings were initially removed from the mother before the review period and placed with relatives for part of the review period, and then later reunified with the mother for the remainder of the review period. The court dismissed the petition on the focus child and father and relinquished jurisdiction to family court, but went forward on the dependency petition for the mother as it related to the three half-siblings. Even though the court dismissed the petition on the focus child and father, the agency continued to supervise the family for an additional three months during the review period.

We have approached this case as an in-home case for the focus child, but have answered the review elements related to the assessment of risk, identification of service needs and referrals for needed services for all four children, because it is one case involving two households. Local CBC has expressed concern about us looking at the case management for the six months the agency continued to supervise the child and father (we treated it as a VPS case), and believes we should not consider the additional six month period when assessing the quality of services as to the other three children. Reportedly, they continued to supervise the father and son because they did not believe the judge relinquishing jurisdiction to the family court trumped the dependency action. Additionally, local CBC does not think we should be assessing the risk, service needs and referrals for the three half-siblings who remain with the mother. The focus child spends every other weekend at the mother's home and half of each summer at the mother's home.

The record contains an October 17, 2007 court order on the judicial review and notes it is in the best interest of the focus child to remain with his father under protective supervision. The goal was maintain and strengthen.

Response: There is no logical rationale that would support NOT reviewing the 6 months of ongoing services/supervision case with focus child and father - no matter what the agency thought about dependency trumping the court's decision to relinquish jurisdiction. It is critical that we look at the whole picture which means assessing case work activities related to the focus child and siblings no matter which home he/they live in or with which parent for the period under review.

29. Question: For Standard #21, there is a case plan in the record, but it was not submitted to the court. How should the standard be rated?

Response: Reviewers must consider the language in the requirement section to fully realize the intent of the standard. Since the requirement specifies the plan be prepared and submitted to the court within 60 days or removal, (or 30 days if In-Home) or dispositional hearing at the latest, the reviewer would have to show the standard was not achieved if the plan is beyond the time frames and is not submitted to the court within the time frames.

30. Question: This case involved two fathers. One of the father's rights has been terminated, and the other one is incarcerated. The court entered a no contact order with the child. Given this the reviewer considered Standard #50 as an NA. Is this correct?

Response: While it's true the rating options and considerations sections are not all inclusive, the reviewer should not consider the standard not applicable simply based on the father's incarceration and no-contact order. Reviewers should consider some of the following:

- what's the father in jail for? Some heinous crime?
- how long is in for?
- how involved was he in the child's life before incarceration?
- why did the court order no contact between him and the child?
- what's the permanency goal - any remote possibility that the father would be considered as a placement option/reunification?
- is there a plan to terminate his parental rights?

The child welfare system is obligated to assess parents' needs even when they are incarcerated (regardless of a no contact order with the child). So, a reviewer must determine if there are truly compelling reasons why one wouldn't expect the same practices in this case.

If the assessment wasn't done ONLY because of the court ordering no contact with the child, this is insufficient reason. One may not have been able to engage the father in service delivery (#51) but case workers must still assess the need.

31. Question: This scenario involves a child who was reunified in August 2006. In January 2007 he was removed prior to the post placement supervision being completed. Our review period began October 1, 2007. If the child entered care nine months prior to the beginning of our review period, would this constitute a re-entry because it is less than 12 months before the beginning of the review period, or does the child have to re-enter during the review period?

Response: This case would not show up on FSFN as a re-entry if looking at the data during the period under review since the 12 months would have ended August 2007. The CFSR protocol, which is the foundation for Florida's system, states the purpose in assessing this standard is to, "assess whether children who entered [not those who were already in] foster care during the period under review were re-entering with 12 months of a prior foster care episode."

32. Question: The case being reviewed was an out-of-home case. The child had a good educational assessment, services were provided but had not "reduced or resolved" the issue. While there was on-going reassessment, it still does not meet the Yes definition. In looking at all the possible responses, none fit. There is a significant difference in language between Yes and No. Yes speaks to reduced or resolved and No speaks to providing the services and that was already addressed in Standard #57.

Response: Reviewers should document Yes, based on an assessment being done, identifying the services needed and the services being provided. If they are not working, and there is an ongoing assessment, and no additional interventions are identified by the experts, it would not be appropriate to rate "No," without documenting the additional interventions needed. However, if an additional assessment was indicated, based on the concerns not being reduced or resolved, and not done, a "No" rating would be appropriate.

33. Question: Should reviewers consider a courtesy worker's supervisor's reviews when assessing Standard #20? For example, if two were done by the courtesy supervisory and two were done by the primary worker's supervisor, would a reviewer answer yes?

34. Response: Yes, FSFN does not distinguish between courtesy supervisor reviews versus primary supervisor reviews.

35. Question: For Standard #42, the instructions for a Yes response do not match the wording of the standard. A Yes response implies successful identification and recruitment of an adoptive family rather than "appropriate steps were taken..."

Response: This will be reworded in the next version as the standard is indeed assessing taking the necessary steps rather than end results of successfully identifying a specific family.

Also, for Standard #42, a NA response option includes APPLA or reunification cases.

36. Question: For Standard #19, a NA response is needed for cases where there were no placement changes.

Response: Agree. This option will be included in the next version.

37. Question: Shouldn't Standard #45 reference age 15 rather than 16?

Response: Yes, this will be modified in the next version.

38. Question: For Standard #66, how are we supposed to be answering this? Is it based on the status of the case on the last day of the review period or as of the date the review is being conducted?

Response: The intent of this last standard is to encourage reviewers to sit back and really reflect on everything they've learned about the child, the family, the case work, future plans, etc. and determine how likely it is, that at the end of the day and given all of this information, that the child will continue to be in a good place over the next 12 months. Do not limit your thinking to the period under review. Consider the question in real-time, the here and now as events may help shape the child's future.

Do not limit your thinking to the period under review. Consider the question in real-time, there here and now as events may help shape the child's future.

39. Question: Of late we've been hearing that there are discrepancies in how reviewers are addressing standards for in-home cases, that is to say, does the standard apply to the in-home focus child or to all in-home children. Practice variances include:

- ✓ consider all children in in-home case reviews (at least for **specific standards** similarly to the CFSR),
- ✓ remain focused on the focus child except where **instructions** clearly indicate an assessment of all children is expected, and
- ✓ rely on the actual **wording of the standard** itself - if the standard references "child" versus "children" then the reviewer responds accordingly.

Response: As to the focus child in in-home cases and after conferring with ACF, Children's Bureau last week, we will "**consider all children**" when reviewing an in-home case, but the way the model is designed, it is logical to collect the data specific to the sampled child or all children if the standard and/or instructions specify such. By "**considering**" all children in the sampled in-home case as you move through the review process, you will then advise local management of any issues you've identified, but data collection will be on the focus child unless otherwise specified. And, you certainly have the option to drill down further if deemed necessary in a separate review.

40. Question: Do we rate all in-home standards when reviewing a case involving a child in a post-placement supervision setting?

Response: The standards will be updated for the new fiscal year to include specificity in identifying which standards apply to this specific population. Several of them do not currently specify if the standard applies to all cases, out-of-home care cases, and/or post placement supervision cases. Therefore, in the meanwhile, reviewers should rate all standards that indicate "applicable to all cases" to include post-placement supervision, as well as those that specify post-placement as already exists in Standards 9 and 10.

In addition, the following standards should also be rated for this population.

Standards # 2, 11, 13, 14, 24, 56, 57, 58, 59, 60, 61, 62, 63, 64,

These standards should (and will in the updated version) be defined as “applicable to all cases”

Standards #36, 37 and 66.