

MANDATE MATRIX CHILD WELFARE

Mandate	Federal/State Rule	Outcome/Result	Impact on Counties	Recommendation
<p>NCFAS</p> <p>This assessment form is required only by rule and no data or information about the assessment or changes has ever been communicated to counties or statewide to assess families in our system.</p>	State Rule	There is no link between completing the NCFAS and desired child welfare outcomes nor case management decisions.	<p>This is a make work form that is out-dated and is not used to make any decisions.</p> <p>It is incredibly time consuming and data from the tool has not been produced in years. The tool may have been useful 10 years ago but practice changes and tools address the same issues.</p>	<p>Recommendation: Review the evidence regarding the continued county use of the NCFAS in its present form.</p> <p>Determine if it should be discontinued or modified without degrading quality of child welfare interventions.</p> <p>Consider reducing the domains to those that are useful, specifically the 6th and 7th domains are not very helpful.</p> <p>Or continue use but eliminate requirement. It is used on occasion, esp. for case closure decisions.</p>
<p>NCFAS</p>	State Rule		The requirement for the NCFAS to be completed before the 3A can be difficult if the disposition is set before the 60 day deadline for the NCFAS.	<p>Recommendation: If the NCFAS is to continue, a recommendation would be that the initial NCFAS be due with the first 90 day review to allow the caseworker ample time to gather all information to complete it accurately.</p>
<p>Timing of Medical & Dental Appointments</p>	7.708.41D	There is no link to having a short time	Counties are consistently found to be out of compliance	<p>Recommendations: Adjust the time frames or eliminate requirement and consider</p>

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<p>The time frames for children entering care to have an initial medical and dental appointment scheduled was set by the State and is not a Federal time frame.</p>		<p>frame and safety of children.</p>	<p>with this arbitrary deadline. If there is a medical or dental emergency, children are taken in for medical or dental care.</p>	<p>offering exceptions for children who have been assessed and do not need treatment.</p> <p>Note: The appointment must be scheduled within 10 days.</p> <p>Adjust the time frame but cannot eliminate this due to the CFSR. It is important to have medical checkups.</p>
<p>New Allegations of Child Maltreatment</p> <p>If a county receives new allegations within the first 30 days of an open assessment, it must open a new referral and assessment rather than incorporating the additional information into the existing assessment.</p>			<p>Counties currently must open a new case for assessment (investigation) if new allegations of child maltreatment are received within the first 30 days of an open assessment.</p> <p>This results in duplicative work for the counties.</p>	<p>Recommendation: Review looking at how new allegations received during the first 30 days of an open assessment might be incorporated into the current assessment rather than through a new referral and assessment.</p> <p>This would avoid the caseworker duplicating ROC notes, safety and risk assessments and allow for all safety concerns that present during the 30 day assessment period.</p>

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<p>Timing of Mental Health Appointments</p> <p>An arbitrary time frame requirement is in place for mental health appointments when many of the providers cannot meet the time periods.</p>	State Rule	There is no link to having a short time frame and safety of children.	<p>Counties are consistently found to be out of compliance with this arbitrary deadline.</p> <p>If there is a mental health emergency, children are taken in for assessment and services.</p>	<p>Adjust the time frames or eliminate requirement.</p> <p>Note: The appointment must be scheduled not occur within 10 days.</p>
<p>Number of Administrative Review Division Reviews</p> <p>Title XIX requires that an administrative review each six months after initial review “may” be ordered by the court and every six months thereafter. The Court may serve in this capacity. This seems duplicative and unnecessary.</p>	Title XIX		<p>Caseworkers are paying more attention to documenting to what ARD requires than they are to outcomes for children and families.</p> <p>When reviewing federal requirements it appears the State process goes far beyond and has taken on a life of its own. Maybe cut the reviews in half and have the court review carry more weight.</p> <p>These reviews consume voluminous amounts of time for Caseworkers, Supervisors and Administrators.</p> <p>ARD has arguably become far more punitive than constructive. Given our unique circumstance (the</p>	<p>Recommendation: Consider eliminating or modifying the Administrative Review Process.</p> <p>Some states defer to the court for updates on cases.</p> <p>This is subjective based on ARD’s opinions.</p> <p>ARD reviews can be helpful.</p>

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			<p>Court), we already have a degree of external oversight, and with our evolving internal Permanency Roundtables work, OPPLA Review Team, et al.. Counties now have the capacity to better monitor ourselves.</p> <p>Caseworkers have to dually prepare for ARD case reviews and court hearing on virtually the same issues. The courts do it on all cases but ARD does it on a sample basis.</p>	
<p>Administrative Review Division Instrument</p> <p>ARD requires duplicative documentation of child/parent/adult functioning in TRAILS.</p>			<p>ARD in-home review, some of the requirements for WHERE to document information in Trails as unnecessary and duplicative.</p> <p>This is a workload issue for caseworkers.</p>	<p>An agreement that child/parent/adult functioning may be documented in the reports of contact, rather than in the separate Safety Assessment section. This would require a change in ARD's instrument.</p>
<p>Institutional investigations</p> <p>Institutional investigations are conducted by counties on state facilities. This is an</p>	State Rule	Child and youth safety	<p>At one time the state completed these then returned the requirement back to the counties. Day care facilities although 3rd party abuse and</p>	<p>Recommendation: Consider turning this back to the state.</p> <p>Note: from one county: Is this unfunded? I would not want</p>

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unfunded mandate, especially for those counties that have several state facilities.			not 24 hour care facilities are also required by counties.	to lose CW Admin. funds.
TRAILS Printing			End the printing of any document that is available through TRAILS. While a little improvement has been seen we have to do printing of provider contact notes, screen prints of documents for IV-E audits that are all available in TRAILS.	Recommendation: To save funding and better manage resources and data storage, it is recommended that the state and its agencies move to a paperless system based on TRAILS, when appropriate.
CPA Home Study Reviews by Counties Counties have to review Child Placement Agency home studies at the providers.	State Rule		County child welfare staff have to drive to provider locations to review CPA home studies.	Recommendation: Require CPAs to provide copies of home studies in Trails of providers so counties do not have to request and often drive to facilities to review the study. All Home Studies should be in Trails.
Certification Requirements of Workers The State is requiring every county to write letters certifying that our child welfare caseworkers and supervisory people have the	State Rule		This is duplicative and overkill . It is redundant to submit letters attesting to the fact that counties are hiring only qualified people and that they have completed their 40 hours of mandatory training over the past 18 months and	County Agencies are required by the CDHS to submit a list of employees for inclusion on the Adoption Home Study Vendor List if they complete adoption home studies. The state should have

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<p>appropriate degrees and training. They are also requiring that we submit training logs for casework and supervisory staff. In addition; the State is going to do onsite audits to verify the same information in every county starting in July 2011.</p>			<p>then for the State to come out and audit. There is no need to submit anything if they will be doing onsite audits.</p>	<p>verification of the SAFE training in the records and should not be asking for copies of certificates to be provided by the employees.</p> <p>The employees are to attach and sign a notarized attestation of understanding, provide a copy of their diplomas verifying the education requirements, and a copy of their SAFE training certificate verifying they have been trained in how to do SAFE home studies, which are mandated by the State of Colorado.</p> <p>Workers that complete adoption home studies must submit proof of SAFE training and copy of diploma. The state did this training and should have a record of it.</p> <p>Recommendation: Eliminate the audit and keep the signature requirement.</p>
<p>Family Service Plans (FSP) Counties are presently</p>			<p>If a parent has not yet made themselves available to the Department or to the Court, it</p>	<p>Recommendation: Drop the requirement that Family Service Plan objectives be</p>

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required to include absent parents in our FSP by adding written objectives for them.			seems like an exercise in futility to add the objective. Of course, the county continues to search for them; it is just the paperwork part.	written for absent parents.
Family Service Plans (FSP)			It seems unnecessary to complete the Family Service Plan 4A every six months. It seems as though once would be sufficient.	
Family Service Plans (FSP2) Counties are required to complete a Family Service Plan 2 Form for children who are abandoned or for whom no parent can be found.			This is a difficult form to complete if no information is available for the county to enter.	Recommendation: Modified version of FSP 2 should be available for abandoned infants and other children for whom no parent information is available.
Child Protection Teams Child protection teams are required to review every child protection case.	19-3-308 6 (a)		Major workload issue for county workers, supervisors and community members.	Recommendation: Amend law to allow for the review of a random sample of assessments to determine practice.
Intra-County Transfers When voluntary child welfare cases move from county to county, the receiving county typically completes a new			This is a duplication of effort by the receiving counties, as they complete a new assessment through intake.	Recommendation: Develop a statewide protocol for transferring voluntary cases to another county

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assessment on the case.				
<p>Information for Mandatory Reporters</p> <p>Provide information to “certain mandatory reporters” within 30 calendar days.</p>	<p>State Statute Senate Bill 10-152</p>		<p>This bill impacted county workloads and is an unfunded mandate.</p> <p>The Mandated Reporter Letter requirement is an unfunded mandate that results in duplication in referrals assigned for assessment. At least one county requires the caseworker to contact the reporting party as part of the investigation. Sending a letter as well is a duplication of this contact.</p>	<p>Note: This bill was recently passed by the Legislature.</p> <p>Recommendation: The letter be sent to mandated reporters only if the referral is screened out. In addition, the letter be consistent across the state and generated in Trails.</p> <p>In addition, the wording could be amended to add a provision that this information will be provided to those mandated reporters with ongoing relationships with the child WHO REQUEST the information.</p>
<p>Foster Parent Policies and Procedures</p> <p>The state wants written policies and procedures for foster parents in addition to</p>	7.708.65		<p>This is redundant and unnecessary when the state has specific requirements for foster parents.</p>	

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Volume VII, the state should develop one comprehensive plan rather than require each county to develop individual policies and procedure.				
<p>Foster Care Respite</p> <p>Some very experienced foster parents have retired from full time foster care but want to help other foster parents by providing respite. The state does not make a distinction between certified foster parents and certified respite parents. The requirements are the same. This is a disincentive for foster parents who want to provide respite but do not have time to complete all of the ongoing training requirements each year.</p>	7.708.31 D		<p>This is a burden on certification workers who must track similar requirements as regular foster parents for those foster parents only providing respite.</p> <p>The requirements for any one providing respite care to be fully certified is time consuming, drives work that none of the counties can possibly keep up with.</p> <p>Not allowing family members of the resource family who embraces the foster or kinship children, really goes against providing a normal family life experience for our children. This prevents much needed respite care that families normally need. It is important to run the</p>	

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			background checks and visit the home if the child is not being cared for in the providers home. Possibly the CPR/First Aid could remain.	
Certification of Relative Caregivers			The waiver process for rules for families is difficult and takes an inordinate amount of time. This is most difficult for our relative caregivers, but drives an enormous amount of work for the staff.	Recommendation: Review of rules that could be eliminated for the certification of relative care givers.
Foster Care Respite	7.708.31(D) 7.406.1(F)		Our biggest issue is the discrepancy in rules for respite care. Rule #7.708.31(D) states, in part, "Respite care for a foster child(ren) in a certified foster home, other than the foster child(ren)'s identified foster home, that exceeds the license capacity of the foster home, shall occur for short term temporary relief of the foster parents(s) for not more than seven (7) consecutive days per month not to exceed 28 days in a calendar year.	Recommendation: These rules should be exactly the same, with the same time frames noted, and both divisions of the state (Child Care Licensing and Child Care Monitoring) should agree on the administration of the rule and support it with counties and providers.

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			<p>State Child Care Licensing interprets this rule to mean that all foster parents, regardless of whether their license capacity has been exceeded, can only provide respite for up to 7 days at a time.</p> <p>Rule #7.406.1(F) states, in part, that the state reimburses counties when "A child is absent from an out-of-home placement and the county department elects to reimburse the provider during the absence period for the placement for one of the following reasons:"</p> <p>"2. Thirty calendar days absences are allowed for the following reasons: a. Respite (unless care is being provided and it violates Section 7.708.31,D, and causes a family foster care home to be over capacity)".</p>	
<p>Semi-Annual Emergency Training</p> <p>The semi-annual emergency</p>	<p>7.708.65 (C1)</p>	<p>The chances that an individual is going to be a</p>	<p>This is unnecessary county work every six months and could easily be an annual requirement at the time of re-</p>	<p>Recommendation: Consider making this requirement annual.</p>

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<p>training requires certification workers and foster parents to review the foster parents' disaster plans twice per year.</p>		<p>victim of a natural disaster are minimal; requiring this exercise twice a year is not evidence based to improve child safety.</p>	<p>certification. There are many other types of emergency training that could be relevant such as medication administration or wound care, yet the state requires the review of disaster plans every six months.</p>	<p>Drills should occur with each new placement.</p>
<p>Corrective Action Plans</p> <p>The state requires that corrective action plans be written any time a case is found to be out of compliance.</p> <p>Writing quality assurance plans to monitor a problem found in reviews when the missing item was minor and/or not actually required by rule or statute and/or is an isolated incident occurring in only one case is redundant. A plan is not needed if every other case is in compliance.</p>	<p>Volume 7: N/A 7.500.3 (c)</p>		<p>This creates a workload for counties.</p> <p>Writing quality assurance plans to monitor a problem found in reviews when the missing item was minor and/or not actually required by rule or statute and/or is an isolated incident occurring in only one case is redundant. A plan is not needed if every other case is in compliance.</p> <p>If a corrective action plan is needed for an error or omission for one item in one case; it should be a plan about not making an error at any time rather than a corrective action that addresses a county's whole</p>	<p>Recommendation: An alternative would be to eliminate this requirement if the issue is not systemic.</p> <p>Corrective action plans should never include a County writing a policy that simply restates Volume VII requirements. To develop a policy that echoes Volume VII is redundant. This has been a State requirement in Foster Home Certification Reviews as well as in Child Welfare Program Reviews.</p>

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			<p>operation in the area of the error or omission. Writing the plan adds an unnecessary extra step which takes time and money to both monitor and report on the County and State sides.</p> <p>Counties report that they complete corrective action plans, but still do not have their final reports from the state. They believe audits often involve work that is not even a requirement of Volume VII and always go beyond the scope of the errors or omissions identified in the reviewed files.</p> <p>The subjectivity around reading home studies was overwhelming and required enormous amounts of work. For example having to do a new update or addendum because the reader pick up an issues that was 25 years old, happened in relationship that preceded a stable marital relationship of 20+ years. Not sure why it is necessary</p>	

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			to do the annual attestation when the state then comes to audit. This is very time consuming and seems redundant.	
<p>Foster Care Home Certification</p> <p>Counties are required to keep current copies of driver's license, insurance cards, etc. to establish that no document expires.</p>	<p>7.708.46 C</p> <p>7.708.31 (f)</p>		<p>It is excessive to check and recheck to assure that foster parents have auto insurance or that they have their driver's license. If this continues, we will need to check caseworker's driver's licenses daily to assure their driver's licenses have not been revoked for some reason and that they have renewed it in a timely manner.</p> <p>In addition, state law requires all drivers to have insurance, thus it is redundant to have counties verify this.</p>	<p>Recommendation: This could all be completed at an annual recertification to ensure the foster parent is in compliance.</p>
<p>Foster Care Home Certification</p> <p>State rule requires the counties and providers to document insurance, pet vaccinations and other</p>	<p>7.708.31 (f2)</p>		<p>This rule generates considerable work for county foster care certification workers and foster care providers in tracking dates and renewals.</p>	<p>Recommendation: Acquiring documentation of driver's license, pet vaccinations, insurance coverage be done at certification and re-</p>

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documents when they expire throughout the year.			It is so time consuming for workers to have to chase this when everyone's insurance, driver's licenses, pet vaccination, etc. expire at different time. It is also a huge burden for our providers.	certification and not at each expiration date.
<p>Foster Home Certification</p> <p>Employees of County Departments who complete adoption home studies must be on an approved adoption home study vendor list maintained by the Colorado Department of Human Services. County workers had to sign and have notarized an Attestation of Understanding, provide proof of SAFE training, and a copy of their diploma.</p>	Statute 19-5-207 (11) (2) (b)		This is duplicative work for counties. All workers took the SAFE training at the state, and they should have a copy of this at the state. The question is, why ask for information you already know.	<p>Recommendation:</p> <p>Eliminate this unnecessary requirement.</p>
<p>Foster Care Certification</p> <p>Annual attestation statements from each county regarding county-certified Foster Care provider requirements.</p>	There is no state rule supporting this, only agency letter CW-08-09-P.	This is a duplicative process, since all requirements have to be entered in	This impacts county resource workers and supervisors by requiring additional time and documentation of information that is available in files and is audited to	<p>Recommendation:</p> <p>Eliminate the requirement of an annual attestation.</p>

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		Trails AND counties are now audited by the Foster Care Program Review unit on an annual basis.	annually.	
<p>Provisional Foster Care</p> <p>Colorado allows provisional foster care certifications for only 60 days. The Federal rule allows provisional certifications for six months.</p> <p>Also, Colorado rules do not allow provisionals for non-kin child-specific placements, even if this appears to be the best match for the child.</p>	<p>7.304.21(D)(2)(e)(1)</p> <p>7.304.21 (D) (2) (f)</p>	Counties are reluctant to place children in provisional homes because of the financial impact on the county, so children are placed with strangers or placed in a home without the best match possible, and have to move more times.	If counties place in non-kin provisional homes and/or the provisional homes are not fully certified within 60 days, the FC payment becomes 100% county funding instead if 80/20.	<p>Recommendation: Change the Colorado rule to match the Federal timeframe for provisional certifications. One option would be to have some requirements still completed within 60 days but to have less critical requirements completed within six months.</p>
<p>Caseworker and Foster Home Certification Worker Contacts</p> <p>State rule requires monthly contacts with children placed</p>	<p>7.001.6</p> <p>7.202.62</p> <p>Agency Letter</p>		The state requires monthly contacts with children. In addition, foster care homes are also contacted monthly to ensure they remain in	

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<p>out-of-home.</p> <p>State rule requires foster care certification workers to also visit foster homes monthly.</p>	CW-10-25-P		compliance with ****	
<p>Disaster Preparedness</p> <p>Counties are required to complete semi-annual reviews of the Disaster Preparedness guide.</p>			<p>This is busywork for county staff and foster homes. Foster homes already conduct emergency fire drills and evacuation drills on a regular basis and when a new child enters the home.</p>	<p>Recommendation: Review rule and possibly reduce reviews to once per year.</p>
<p>CPR/First Aid Requirements</p> <p>CPR/First Aid requirements for respite care providers. It seems as if that the criminal checks clearance would be more of a risk factor than not having the CPR/First Aid certification.</p>	7.708.31	<p>Potential respite care providers may pass background check requirements but do not have CPR/First Aid instruction.</p>	<p>This leads to the Department having to deny the child/youth a chance to go on an outing and/or overnight, and stigmatizes the child with the “foster child label.”</p>	<p>Recommendation: Eliminate the CPR/First Aid requirement for respite care providers unless the child has physical or medical risk factors.</p>
<p>Child Safety Seats</p>			<p>Revisions to child safety seats policy when we took exactly what was in the law and were told to go beyond that.</p>	
<p>Foster Care Recruitment Plan and other similar plans</p>			<p>In addition to being new requirements, they really aren’t helpful or useful.</p>	

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<p>Counties have been asked to complete plans to state what they will be doing to accomplish various goals, such as foster care recruitment and monthly contacts.</p> <p>Counties are now required to submit these plans to the state where they are not used for anything.</p>			<p>If the State truly wanted to recruit and support foster parents, they would decrease the numbers and kinds of record keeping added that is tedious, and time consuming.</p> <p>These plans take large amounts of time to complete.</p>	
<p>Adoption Subsidy CW-SA 4</p> <p>Counties are required to send out a CW-SA4 form every three years to subsidized adoption homes to renew the subsidy. If the family has moved, or does not return the forms, the subsidy will continue anyway and cannot be closed.</p>	<p>Volume 7: 7.306.41(E)(12) and 7.413</p>	<p>Since the forms are not needed to keep the subsidy going, this form does not accomplish anything.</p>	<p>This is make work for the county and has no impact on families or adoption subsidizes.</p>	<p>Eliminate this requirement from state rule.</p>
<p>Adoption Subsidy</p> <p>Requiring the parents of Subsidized adoption children send the department the children's school information is excessive, intrusive, and</p>		<p>None.</p>	<p>This information does not change the subsidy in any way nor is it even relevant.</p> <p>The subsidy will continue regardless the educational arrangements for the adopted</p>	

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does not accomplished anything.			child/children.	
<p>Child Protection Assessments</p> <p>Counties are required “To assess for safety all children, caregivers and family member in the home shall be interviewed.”</p> <p>Interviewing every child in the home after interviewing the alleged victim and learning that the report does not have any credibility can add several hours of work for a caseworker.</p>	Volume 7: 7 202.52(C)&(E)	None.	It can be an intrusive and a useless waste of time for the family and county. It can require considerable caseworker time.	<p>This rule requirement should be eliminated from state rule.</p> <p>If the alleged victim reports positive family interactions and no abuse/neglect and our interviews with parents result in clearly unfounded allegations, then interviews with additional family members should be on a case-by-case basis and decided on the best interests of the alleged victim.</p> <p>It is important to interview all the children in the home besides the victim. A caseworker never knows when another child in the home may have overheard or viewed something to corroborate the allegations. They may report their own allegation which the RP knew nothing about.</p> <p>Note: CAUTION HERE B/C IT'S VERY COMMON TO HAVE ONE CHILD</p>

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				DISCLOSE ABUSE ON A SIBLING WHEN THE VICTIM DENIES IT. I DO NOT SUPPORT CHANGING THIS REQUIREMENT BUT IF IT IS CHANGED, THE CASEWORKER SHOULD HAVE DISCRETION ONLY WHEN IT IS CERTAIN THAT SIBLINGS ARE SAFE AND CAN'T PROVIDE ANY ASSESSMENT INFORMATION.
<p>Sexual Abuse Assessments</p> <p>Counties have to check sex offender registries for every sexual abuse case, to see if they are on a registry and determining if they are at the same address they are registered at, to notify Law Enforcement if they are not is a waste of county time.</p>	Volume 7: 7.202.52(I)	This requirement neither protects children nor helps in the assessment.	Maintaining sex offender registries should not be the responsibility of the county departments.	<p>Law enforcement is involved in these investigations; this could be transferred to their responsibilities if this function is needed.</p> <p>In our county and other counties, Law Enforcement is not always involved and this procedure needs to be in place to protect children.</p>
<p>Cross-County Referrals</p> <p>When a referral is sent to another County, the County is required to send the same</p>	Volume 7: 7.202.4(G)		This requirement creates workload on the sending county. Trails and one other notification would be	Note: Some county staff believe this rule should be kept as is (alerting other counties of referrals via

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complaint to that County through Trails, fax and phone call.			sufficient; being required to fax and call is overkill and a waste of time and money.	Trails, telephone AND fax). Another county felt that Trails and a phone call to the correct person/department is enough.
<p>Repetitive Diligent Searches</p> <p>Continuing searches are required <u>after</u> the child is already placed with a family member who was located through diligent search and the plan is for that family member to adopt the child or children. Diligent searches continue to be required <u>after</u> all known family members have been located and have decided they are unable to care for the children. They are required even after a child is placed for adoption and an adoption petition has been filed with the court.</p>	<p>PL 110-351</p> <p>SB-09-245</p> <p>7.304.52</p> <p>Agency Letter CW-09-34-1</p>	There is no result or benefit after the first search.	<p>This is a make work requirement for counties. The report can be lengthy to process.</p> <p>No one questions the value of an initial diligent search, however, it seems repetitive to continue making a request for additional searches every 6 months, when no one has been identified in previous searches or when the children are already placed with relatives.</p> <p>The rule requires diligent searches “throughout the life of the case.” It also requires workers to enter into TRAILS notes and 90 day review information.</p>	<p>Recommendation: Diligent searches should initially occur but be discontinued after a limited time, as they are not productive.</p> <p>Note: Perhaps the number of searches could be limited to a set number, when new information is obtained, or at the filing of the termination motion.</p>
<p>SAFE Home Studies</p> <p>The state requires yearly</p>	7.003.2		Increased workload on county workers.	

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updates but the creators of the SAFE format do not require this but the State of Colorado decided to require it.			Being forced to use the Safe format for updates when it the creators of this assessment do not require this is not productive or efficient.	
<p>SAFE Home Studies</p> <p>The State requires that a full, complete new SAFE Home Study is due when a foster parent moves to another location in the county, not simply the portions that relate to their home, school, living arrangements but a FULL, COMPLETE study is required.</p>	<p>Note: Only an update is required.</p> <p>7.500.31 A 6</p>	<p>To do a complete home study that is of no use or value, NO value.</p>	<p>This creates extra work for the counties and is intrusive to the families. We've noted that a move across town has not changed any of the foster families we've certified.</p> <p>Requiring new independent contractors to have outside supervisors when they are receiving supervision in their work with the county is duplicative and elongates the home study process</p> <p>When a family transfers to another county having to do new reference checks when the references were checked as a part of the original or current study is wasteful.</p>	<p>It would seem that all that would be needed is for the worker to ensure the new home is safe and meets physical foster home specifications by doing what used to be the CWS 50; which was the evaluation of the physical home, observe the home for safety issues; all of the requirements about the physical facility; not a completely new study.</p>
<p>SAFE Home Studies are Redundant</p> <p>County child welfare is required to complete a SAFE</p>	7.500.2 C1, C4a, D		SAFE study formats have numerous redundant areas for duplicate information. Information should only be required one time in the	

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assessment.			study. While information is duplicated the format does not include areas required by Volume VII. For example, marital/domestic partner information, extended family members, health evaluations, criminal records, home and community and applicant profile areas are areas wanting information in the initial part of the study and again, the same information is required in the Psychosocial Evaluation area. Areas, such as ability to work with child welfare or nutritious meals and snacks are not included.	
<p>SAFE Home Studies for ICPC cases are not needed.</p> <p>For interstate child welfare placements, Colorado completes a labor intensive SAFE study for all cases sent to Colorado.</p> <p>The state of Colorado mandates that all ICPC home studies be completed in the</p>	<p>7.307.52</p> <p>The Interstate Child Placement Compact (ICPC) is an agreement among states to conduct courtesy reviews and approvals of placements of children placed.</p>		<p>This is an unnecessary and unfunded mandate for counties.</p> <p>The SAFE home study is very time consuming. Counties are consistently not in compliance with this deadline. The CBI/FBI background checks that should be completed prior to doing interviews for the</p>	<p>Recommendation: Eliminate the SAFE study from ICPC cases locating in Colorado.</p>

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<p>SAFE format. They also require that the home studies be completed within 30 days and no later than 60 days.</p>			<p>SAFE study often take at least 30 days just to receive results.</p> <p>Other states do not conduct SAFE studies of placements for Colorado’s children. This is a time consuming requirement that drains caseworker time and is not reciprocated by other states.</p>	
<p>Child Protection Referrals</p> <p>The state requires “the county shall assign a referral if it results in a third report of suspected abuse or neglect within a two year period...”</p>	<p>7.202.4(F)(4)</p>			<p>This rule is unnecessary and should be rescinded.</p> <p>One county felt that the rule is helpful in identifying concerns in cases where multiple referrals are made.</p> <p>THE RULE SAYS “A THIRD REPORT OF SUSPECTED CHILD ABUSE OR NEGLECT” NEEDS TO BE ASSIGNED. WELL, <u>ANY</u> REPORT OF SUSPECTED CHILD ABUSE/NEGLECT NEEDS TO BE ASSIGNED, REGARDLESS OF ITS PLACE IN LINE. FURTHERMORE, WHAT IF IT’S THE 3RD REPORT</p>

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				BUT THERE ISN'T "SUSPECTED ABUSE OR NEGLECT"? THE RULE DOES NOT GIVE DIRECTION.
<p>Program Area 4 or Youth in Conflict Assessment</p> <p>Counties are required to open youth in conflict cases by entering data in all of the screens in TRAILS that relate to abuse or neglect even though neither may be indicated.</p>	State Rule		<p>Currently PA 4 or Youth in Conflict cases must be data entered into Trails the same way child abuse investigations are entered.</p> <p>This is a significant workload requirement for caseworkers.</p> <p>Other counties disagree because they state TRAILS allows them to by-pass a few data entry fields (risk/safety & findings).</p>	<p>Caseworkers should be able to bypass these extra and unrelated screens and just open Program Area 4 cases.</p> <p>If the family is going to receive PA 4 services, a case could be opened and the assessment of the family could be completed in the FSP 2 and 3c and with documentation rather than including the referral step.</p>
<p>Health Passport</p> <p>Counties are required to enter the information from the Health Passport into Trails. Foster parents track the appointments it is duplicating efforts to then have caseworkers type it into Trails.</p>			This creates additional work for county caseworkers.	<p>Recommendation: Evaluate the value of health passports for children.</p> <p>Note: When children move from placement to placement or across county lines, health passports can be useful.</p> <p>Note: Current passport is dated and should be</p>

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				evidence-based reviewed.
<p>Medication Logs for Foster Children</p> <p>Requiring foster parents to get permission from a doctor to give over the counter medications to foster children in their care is extra paperwork. If the initial physical exam does not eliminate medication, there should be no need to get a piece of paper from the doctor stating that he gives permission to give Children’s Tylenol for example.</p>	7.708.41 (J3) and (J4)		<p>This is just extra work for the foster parent to keep this documentation and for the department to check it.</p> <p>Having to get non-prescription, over the counter consents from the doctor has proven difficult for families.</p>	<p>Recommendation: Eliminate this rule.</p> <p>Following a initial exam by a physician, allow foster care providers, such as families, to provide over the counter medications to foster children unless medically advised otherwise.</p> <p>Note: This requirement is “silly.”</p>
<p>Foster Child Medical and Dental Appointments</p> <p>Doctors and dentists are required to make a statement that proves that a child actually saw them.</p>	ARD Requirement		<p>Having to have a doctor/dentist statement to prove the child actually saw the doctor is requiring extra work for the doctor/dentist, caseworker, and foster parents. In previous years, documenting the date of the appointment in the case was adequate.</p>	
<p>Medical and Dental Providers in TRAILS</p>			<p>Requiring that caseworkers have to open Medical and Dental providers as</p>	

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<u>Mandate</u>	<u>Federal/State Rule</u>	<u>Outcome/Result</u>	<u>Impact on Counties</u>	<u>Recommendation</u>
Rule requires that county caseworkers must open medical and dental providers as providers in Trails.			providers into Trails, rather than just typing their name and address is a cumbersome unnecessary time eating process.	
<p>After Hour Protocols</p> <p>Counties must establish protocols for after hour coverage, plan for documentation by emergency response workers, review referral history, and document.</p>	Agency Letter 7.202.4 B		<p>Example of additional workload for counties.</p> <p>Note: Counties are not required to have written protocols for office hour coverage so why have them for after hours?</p>	
<p>Resource Families and Rules</p> <p>Counties are required to review all rules annually with each provider.</p>			All resource families receive a copy of minimum rules and regulations, yet counties are required to review all rules annually with each provider. It seems that changes an updates would be sufficient.	Recommendation: Consider having resource families have an annual update on any changes to the rules rather than review all rules.
<p>Adoption Home Studies Vendor Lists</p> <p>Employees of County Departments who complete adoption home studies must be on an approved adoption home study vendor list maintained by the Colorado</p>	Statute 19-5-207 (11) (2) (b)		This is duplicative. All workers took the SAFE training at the state, and they should have a copy of this.	

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<p>Department of Human Services. County workers had to sign and have notarized an Attestation of Understanding, provide proof of SAFE training, and a copy of their diploma.</p>				
<p>PSSF Database</p> <p>The PSSF database is required for the grant and the Coordinators must use this to input data. Counties are not able to get information out of this database that allows them to report on the outcome measures that the grant requires. A manual research in TRAILS is needed to get accurate data that is required to report on. The state has not made the fix to this database.</p>			<p>Duplicative work is being done to be in compliance with requirements.</p>	
<p>House Bill 1451</p>			<p>The way the form stands now it has identifying information which I'm sure many family members would not be comfortable divulging even when the use of it is explained. This could</p>	

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			<p>then impact the caseworker’s ability to work with the family if trust is now in question. As far as workload, staff has had numerous additional forms added to their requirements – as you have shared in your matrix- and adding anything more is not appropriate. I know there was talk about having an OMNI employee or in our county an employee of our local mental health center fill out the form to save caseworker time but in that case, the trust issue still exists. Also, this would need to be done after our Utilization Review Team meetings, requiring that a parent would need to give additional time to this, keeping them from their job or other responsibilities. It could not be done during this meeting as we are attempting to get as many cases staffed as possible in the amount of time we have and would not ask GALs, probation officers, caseworkers, etc. to</p>	

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			take additional time, even if someone from Omni or North Range Behavioral Health was actually filling out the form.	
<p>TRAILS Mandates</p> <p>The ever-increasing mandated fields in Trails. There is increasing pressure on counties to put all case information in Trails, which is often duplicative of information contained in handwritten notes and/or other hard-copy documents.</p>	<p>Little of this is in law; most of this mandate is in rule. Requiring documentation is Trails is in nearly all documentation-related rules now.</p>	<p>Caseworkers are under constant and increasing stress to spend more time documenting, and they spend less time with children and families, thus putting the children at risk.</p>	<p>Staff turnover due to job dissatisfaction and to the sense of never doing enough for children and families. Many child protection workers prefer to document by hand in the field and find the duplicate work required by Trails to be overwhelming and frustrating.</p>	<p>Recommendation: Reduce the number of mandatory fields and permit counties to have more information in just hard copy and not on Trails.</p>
<p>TRAILS Mandates</p> <p>Completing the six fields regarding child and parent functioning, discipline style, general family circumstances, etc, in the Assessment in Trails</p>	<p>7.202.52(E)</p>	<p>These fields are often duplicative of information contained within the contacts.</p>	<p>This makes extra work for caseworkers who are addressing the concerns within the contacts or other fields within Trails.</p>	<p>Recommendation: Eliminate the six fields in the Safety Assessment in Trails. This information should be captured in Contact content.</p>
<p>?</p>	<p>?</p>	<p>?</p>	<p>The Trails facility list and the staff person list of regulations for foster parent certification and re-</p>	

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			certification are incomplete, irrelevant, or, redundant. Trails cannot be used as a tracking database for certification or re-certification and instead creates extra work for certifying workers. The Trails lists are a duplication of CWS6A (Approval for New Family Care Home) and CWS6B (Renewal Approval for New Family Care Home). Trails regulations should be eliminated or rebuilt to be relevant and replace outdated forms such as the CWS6A and CWS6B.	
Interview other persons who may have information about alleged maltreatment. Conduct in-state and out of state offender checks on allegations of sexual abuse. Conduct criminal background check on alleged PRAN involving sexual abuse and document. Complete developmental screening for children under	Agency Letter 7.202.52		Additional workload for counties.	

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five. At the time of new assessment, review all prior history.				
New requirement concerning Institutional abuse and neglect investigations.	Agency Letter 7.202.55		Additional workload for counties.	
Requirement to request an extension of an assessment.	Agency Letter 7.202.57		Additional workload for counties.	WHAT'S THE SPECIFIC ISSUE HERE?
Requirement for development of emancipation transition plan.	Agency Letter CW-09-40-I		Additional workload for counties.	AGREED! OR CHANGE TO 60 DAYS
Regarding institutional investigations, sibling visitation, specialized group facilities.	Agency Letter CW-09-20-P		Additional workload for counties.	NEUTRAL
NCFAS added domains, required in in-home and out of home cases prior to completion of FSP 3A.	Agency Letter CW-09-41-I		Additional workload for counties.	
Coordinate training of foster parents regarding Individualized Education Plans.	Agency Letter CW-10-01-A		Additional workload for counties.	The State should provide this training with the Department of Education for Foster Parents and cover the cost.

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Addresses-ETP, Chaffee Program, Adoption Assistance Program, educational stability, transportation costs for children, International diligent search, relative guardian assistance program.	Agency Letter CW-10-02-I		Additional workload for counties.	In general, there have not been a lot of State guidelines regarding this.
Relative Guardian Assistance Program	Agency Letter CW-010-10-P		Additional workload for counties.	DISAGREE WITH REMOVING THIS REQUIREMENT IF RELATIVES ARE ENTITLED TO THIS TITLE IV-E \$
ICWA-9 page form Agency Letter CW-10-13-P. County departments of human/social services shall complete form ICWA-1 in an appropriate and timely manner.	Agency Letter CW-10-13-P Dated 4/15/10		Additional workload for counties, as this is a 9 page new form that is now required.	
Documentation regarding children with disabilities.	Agency Letter CW-10-17-P		Additional workload for counties.	
County response in Trials to ARD findings. Letter requires counties to respond to ARD findings in Trails.	Agency Letter CW-10-18-I Dated 6/30/10		Additional workload for counties.	
County Foster Home Review			Workload issue	DCW QA Team, Program Staff, ARD work to address the duplication of the tools. DCW Program Staff and

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				DCW QA Team be supervised by same person to align policy and practice.
<p>Requires counties to initiate the transition of a student to a public school, charter school, or Charter School Institute when the student was determined to have demonstrated behavior detrimental to the safety of welfare of himself/herself or others within 12 months. County departments are directed to the CDE website to find the list of School District Child Welfare liaisons.</p> <p>The letter requires counties to provide notifications to the schools in writing and by phone, assure that the educational setting is appropriate, invite the school district child welfare education liaison to participate in the development of the transition plan, and provide voluminous documentation</p>	<p>Agency letter 8/24/2010</p>		<p>County departments are directed to the CDE website to find the list of School District Child Welfare liaisons, where 1) it is very difficult to find the list, 2) there are only 17 liaisons listed but there are approximately 178 school districts in the State.</p>	

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from the facilities to the school districts but does not require the facilities to give the documentation to the counties.				

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<p>Coordination Between County Departments and School Districts, and/or Administrative Units to Make Individualized Education Plan Training Available to Foster Parents.</p> <p>County departments of human/social services and local school districts, and/or Administrative Units are required to coordinate in order to make training about Individualized Education Programs available to foster parents upon their request.</p>	<p>Agency Letter CW-10-01-Dated 1/4/10</p> <p>HB 09-1078</p>		<p>This has a county workload impact.</p>	
<p>Counties are not allowed to assess parental fees in CHRP placement cases.</p>		<p>CHRP children are deprived of financial</p>	<p>Parental fee establishment and collection would offset some of the CHRP costs.</p>	<p>Recommendation: Allow parental fee establishment and collection in CHRP cases.</p>

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		support that may be available to them, depending on their parents' income.	These are typically very expensive placements, costing several thousand dollars every month.	
CSE cannot enforce parental child support fee assessments after a youth reaches the age of emancipation, even if the court order allows for this continued support.		Adults with disabilities are deprived of parental financial support.	This impacts the APS system and placement providers for adults. If parental fees could be collected (if ordered by the court), those fees could help offset costs that are currently paid through Social Security and Medicaid.	Examine these rules at the State and Federal levels. Change the rules to allow for life-long CSE collection, if that was ordered by the courts in the CSE case.

