

2021

Performance of Corrective Actions of the Stipulated Supplemental Judgment

The People of the State of California v. Humboldt County Department of Health and Human Services

Progress Report: February 14, 2021-August 14, 2021

CALIFORNIA CENTER FOR RURAL POLICY AT
HUMBOLDT STATE UNIVERSITY



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I. Introduction

The report details progress of Humboldt County’s Department of Health & Human Services (DHHS), Child Welfare Services (CWS) to complete agreed upon corrective actions detailed in the Order of Entry of Stipulated Supplemental Judgment, filed May 28, 2021 in the Humboldt County Superior Court of the State of California. The report covers progress from February 14, 2021 to August 14, 2021.

As required by the Judgment, DHHS contracted with a third-party compliance monitor. The California Center for Rural Policy (CCRP) at Humboldt State University serves as the third-party compliance monitor. This is CCRP’s first report. CCRP’s reports are available to the public.

There are three areas and seven specific issues that were deemed incomplete by the previous monitor, the Center for the Study of Social Policy (CSSP) in February 2021. Figure 1 summarizes these areas and Section V of the report provides a detailed breakdown of each corrective action and an update on progress made between February 14, 2021 and August 14, 2021.

Figure 1. Provisions Deemed Incomplete by CSSP (See Paragraphs 3.C, 3.E, 3.K, 3.M, and 3.N of the Stipulated Final Judgment)	
Area 1: Interagency Protocol	
Issue 1	Timely mental health screening and referral
Area 2: Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendants	
Issue 2	New investigative decisions made per policy
Issue 3	Thorough risk evaluation
Issue 4	Timely child & family team meetings
Area 3: Tribal Collaboration	
Issue 5	Development of fidelity tools
Issue 6	Case reviews
Issue 7	Tracking/reporting contacts with Tribal representatives

In addition, there are two areas that CWS agreed to continue efforts in:

- Development of Child Protection Reporting Guide
- Maintain adequate staffing

There are four primary tools and/or sources of data being used to measure compliance with the above listed areas:

- Case reviews utilizing fidelity tools & case reading tools
- Quality Improvement Plans (QIPs) developed by CWS to measure progress and develop strategies to improve performance
- Data tracking in CWS/CMS (Child Welfare Services/Case Management System) and SafeMeasures

- Child & Family Team (CFT) participant survey

Case Reviews

Case reviews are referenced in several areas of the Stipulated Supplemental Judgment. Case reviews are a process widely used in child welfare programs to gather case-specific data about the daily practices of staff. For purposes of the Stipulated Supplemental Judgment, the case reviews are required to assess CWS's compliance with policies and procedures. Case reviews referenced in the Judgment will provide information about screening and referrals, cross reporting, decision-making, and actions taken by CWS and Tribal and community partners to ensure the safety and well-being of children.

In order to conduct case reviews, CWS & Evident Change will utilize two existing case reading tools and two newly developed fidelity tools designed by CWS in consultation with Evident Change. Evident Change (formerly National Council on Crime and Delinquency-Children's Research Center (NCCD)) is the designated child welfare expert for the Stipulated Supplemental Judgment.

Case Reading Tools

The following case reading tools are being utilized by CWS related to the Stipulated Supplemental Judgment:

- Structured Decision-Making (SDM) Intake Supervisory Referral Reading tool
 - Developed by Evident Change for use by all California Counties
 - Used by CWS to determine whether an appropriate decision was made per policy for new reports received that involved children in an open case or referral
- SDM Investigations Emergency Response Supervisor Case Reading tool
 - Developed by Evident Change for use by all California Counties
 - Used by to determine whether an appropriate risk assessment was made per policy

Specifically, the SDM Case Reading Tools are being used by CWS to improve practice and measure adherence to items in the Judgment related to Emergency Response policies and procedures (Area 2).

Fidelity Tools

The California Social Work Education Center (CalSWEC) at the University of California, Berkeley defines fidelity as "the degree to which a practice as implemented corresponds with the practice as described or intended." Fidelity tools gather data that measures the extent to which policies and procedures are adhered to in the daily practices of an organization.

The following two fidelity tools have been developed by CWS to verify adherence to California Welfare & Institutions Code (WIC) and CWS policy that Tribes are to be routinely contacted to contribute to thorough evaluation during intake and investigations.

- Intake- Supervisor Tribal Collaboration Checklist
 - Developed by Humboldt County CWS in consultation with Evident Change

- Used to measure Tribal collaboration during intake
- Investigation- Supervisor Tribal Collaboration Checklist
 - Developed by Humboldt County CWS in consultation with Evident Change
 - Used to measure Tribal collaboration during investigation

The fidelity tools are designed to ensure that staff who conduct case reviews consistently interpret items the same way. Use of fidelity tools to conduct case reviews can also identify specific areas where staff are having challenges. Per policy and procedure, CWS staff are required to contact and communicate with Tribal representatives at multiple points in the intake and investigation process. The fidelity tools help the County to track and measure the steps and actions that are completed and documented by CWS staff who work directly with the Tribes.

Data Tracking

Multiple data tracking tools and systems are utilized to track progress on corrective actions listed in the Stipulated Supplemental Judgment. Data sources include CWS/CMS (Child Welfare Services/Case Management System), SafeMeasures, webSDM, and CWS's CQI Trello Board. CWS/CMS refers to the statewide child welfare electronic case management system used by all California Counties. SafeMeasures is an Evident Change business intelligence tool which has also been adopted statewide. It uploads case management data from CWS/CMS nightly to provide all levels of CWS staff with case-based outcomes on key performance indicators. WebSDM refers to the database hosted by Evident Change to capture SDM assessment information. CCRP was provided access to all of these data sources and data from these sources was reviewed by CCRP to assess compliance with the Stipulated Supplemental Judgment.

Report Structure

The report is focused on the period of February 14, 2021-August 14, 2021 but includes historical data and information that helps to contextualize the work that is being reported on. The report is organized into the following sections:

- II. Monitor Activities. This section describes CCRP's activities to assess compliance with the areas specified in the Stipulated Supplemental Judgment.
- III. Overall Approach to Continuous Quality Improvement (CQI) at CWS. This section describes the purpose and functions of CWS's CQI program and the department's approach to continuous quality improvement.
- IV. Overall Assessment of Progress. This section provides a brief overall assessment of progress.
- V. Progress on Items in Stipulated Supplemental Judgment. This section gives a detailed report on progress on each corrective action listed in the Judgment.
- VI. Summary of Tribal & Stakeholder Feedback
- Appendix A. Overall Assessment of Progress on Corrective Actions in the Stipulated Supplemental Judgment.
- Appendix B. List of Acronyms

The report was prepared by Dawn Arledge, Executive Director and Amanda Hickey, Senior Research Analyst from the California Center for Rural Policy at Humboldt State University.

II. Monitor Activities

Summary of Monitor Activities (August 25, 2021-October 31, 2021)

The monitoring contract with CCRP was executed on August 25, 2021. All monitor activities discussed in the report occurred between August 25 and October 31, when the first draft of the report was shared with CWS. CCRP focused on assessing progress that occurred between February 14, 2021 and August 14, 2021. Additional monitor activities that occurred after October 31 will be discussed in the subsequent monitor's report.

CCRP requested specific data and documentation to assess compliance with the items in the Stipulated Supplemental Judgment. CCRP was provided access to and reviewed data from CWS/CMS, SafeMeasures, and the Trello board used by CWS' CQI program. CCRP submitted a data request to CWS on September 15 and was provided with a variety of documents including policies and procedures (P&P), monthly reports from SafeMeasures, quality improvement plans (QIPs), and additional reference documents including manuals, desk guides, and training materials.

CCRP attended internal CWS meetings focused on the mental health screening and referral work, child and family team meetings, Indian Child Welfare Act (ICWA) meetings with Tribal representatives, and bi-monthly meetings with Evident Change. CCRP & CWS met every other week to specifically discuss the Judgment and respond to CCRP's requests for information.

CCRP also attended regularly scheduled meetings with CWS and a variety of community stakeholders and Tribal representatives. Community stakeholders and Tribal representatives were identified by CCRP through collaborative discussions with CWS, Evident Change, and the Attorney General's (AG) Office, and by reviewing previous monitor reports.

CCRP directly contacted a variety of stakeholders and Tribal representatives to solicit input on items listed in the Stipulated Supplemental Judgment. CCRP contacted all eight Tribes and Rancherias individually to seek input on CWS compliance with corrective actions listed in the Judgment. CCRP directly contacted each of the Tribe's Social Services Directors by email on 9/29/2021 and 10/14/2021 to request their input. CCRP conducted direct outreach to the following Tribes and Rancherias:

- Bear River Band of the Rohnerville Rancheria
- Big Lagoon Rancheria
- Blue Lake Rancheria
- Hoopa Valley Tribe
- Karuk Tribe
- Trinidad Rancheria
- Wiyot Tribe
- Yurok Tribe

CCRP conducted one-on-one meetings with two Tribes, one on 10/5 and one on 10/6. CCRP was also invited to and attended the Tribes' Social Services Directors' meeting on 10/13 and 10/20. CCRP prepared, presented (10/8/2021) and shared (via email on 10/14) a power point presentation summarizing items in the Stipulated Supplemental Judgment specific to Tribal collaboration at one of the weekly ICWA meetings (described below). CCRP had direct contact with 7 of the 8 Tribes for this monitoring report. CCRP notes that the shortened period in which monitor activities were conducted also shortened the period available for stakeholder and Tribal input. Tribal input and the input of other stakeholders will continue to be sought, and CCRP values the time and expertise provided by those who are willing to engage with the monitor and share their perspectives.

CCRP attended weekly Indian Child Welfare Act (ICWA) meetings hosted by CWS to which all eight Tribes and Rancherias are invited to send one or more representatives. The weekly CWS/ICWA meetings have a broader focus than items listed in Stipulated Supplemental Judgment. They are hosted by CWS to address a wide variety of topics related to Tribal collaboration. The purpose of these meetings is to solicit feedback and advice from Tribal partners. From CCRP's observation of these meetings, they are well-attended by local Tribes and often surface issues that are beyond the scope of the monitor to assess. However, the Tribal input provided at these meetings was helpful to the monitor as it illustrated the many complex aspects of collaboration that are needed to facilitate productive working relationships between CWS and the Tribes.

CCRP also conducted input sessions with CWS staff specific to items in the Stipulated Supplemental Judgment, including input from staff with the ICWA program, the CQI program, and the workforce program.

Specifically, CCRP participated in the following meetings between 8/25/2021-10/31/2021:

- Weekly CWS MHST meetings (regarding Issue 1)
 - Every Monday from 1-2pm
- Weekly CWS CQI meetings (regarding all issue areas)
 - Every Friday from 2-3pm
- Bi-monthly CWS/CCRP meetings (regarding all issue areas)
 - 1st & 3rd Mondays from 2-3pm
- Four report-specific follow-up meetings with CWS in October 2021 (regarding all issue areas). These meetings were held to follow-up on all email correspondence and sharing of documentation that occurred during each week of the month in which the report was written.
 - September 14, 2021 from 4-5pm
 - October 15, 2021 from 3-4pm
 - October 22, 2021 from 3-4pm
 - October 29, 2021 from 3-4pm
- Weekly CWS/ICWA meetings with Tribal representatives (agenda topics varied, some meetings related specifically to issue areas in the Judgment and others focused on other

areas of Tribal collaboration). The weekly ICWA meeting on 10/8/2021 was focused on input from Tribes related to the Stipulated Supplemental Judgment.

- Held on Fridays from 9:30-11am
- Bi-monthly meetings with CWS & Evident Change (regarding issue areas 2, 3, 4, 5 & 6)
 - Held every other Thursday from 1-2pm
- Two meetings with the Social Services Directors of the Tribes & Rancherias (regarding all issue areas)
 - October 13, 2021 from 3-4pm
 - October 20, 2021 from 3-4pm
- CCRP conducted three input sessions with CWS staff to specifically discuss issue areas in the Judgment: one with CWS CQI staff, one with CWS ICWA staff and one with CWS workforce staff.
 - October 25, 2021 from 11am-12:30pm with CWS ICWA staff
 - October 27, 2021 from 9-10am with CWS CQI staff
 - October 28, 2021 from 4-5pm with CWS workforce staff
- CCRP reached out to each individual Tribe and requested a one-on-one meeting to understand the specific perspectives of their Tribe; two Tribes participated in a one-on-one meeting during this time period.
- Meetings with the Attorney General's Office & County Counsel
 - September 8, 2021, 1-2pm
 - September 9, 2021, 10-11am
 - September 14, 2021, 2-3pm

For weekly or bi-weekly meetings listed above, please note that some were canceled due to holidays or scheduling conflicts.

CCRP reviewed all six reports completed by the previous monitor, the Center for the Study of Social Policy (CSSP). CCRP also requested and received a memorandum summarizing activities of the child welfare expert, Evident Change.

CCRP maintained contact with a representative of the AG's Office and responded to requests from the County and the AG's Office regarding the scope of work of the monitor and updates on CCRP's progress.

Report Limitations

The monitoring contract with CCRP was executed on August 25, 2021. Monitor activities did not officially begin until 8/25; the report is a retrospective look back at the time period of 2/14/2021-8/14/2021 based on information provided by CWS and other stakeholders. CCRP did review emails, documents, reports, and information dated during the first monitoring period.

CCRP made a data request specific to items in the Stipulated Supplemental Judgment on September 15, 2021; the request was reviewed and input was provided from both the County and the AG's office at that time. CCRP incorporated all of the input provided by the County and the AG into the data request sent on September 15. CCRP received all of the data requested back from the County on October 1, 2021. Between October 1 and October 31 CCRP reviewed all of

the data provided and requested additional documentation, explanation and input from the County to understand and assess the full scope of activities conducted by the County in response to specific items listed in the Stipulated Supplemental Judgment. This was a compressed window of time to conduct complete and independent verification of all data and information, however, full verification will be completed and reported on in the subsequent monitor's report.

On November 1, 2021 CCRP sent a draft report for CWS review and requested input by November 12, 2021. CWS provided input to CCRP on November 9, 2021. On November 15, 2021 CCRP sent the draft report for AG and Evident Change review. The AG provided input on November 29 and Evident Change provided input on December 1. Report revisions were made between December 1 and January 7. The report has incorporated all of the input that CCRP received. However, some of the requests for data verification were not possible during the 10/1-10/31 window of time that CCRP had to produce the first report. These limitations were discussed with the AG and the County on December 3, 2021. The report will note areas where the requested data verification will occur and be reported on in the second monitor's report.

In addition, meetings and monitor activities that occurred from October 31 forward will be included in the subsequent monitor's report. CCRP has been conducting ongoing monitoring activities for the second monitoring period (8/15/2021-2/14/2022) concurrently while assessing progress for the first monitoring period.

III. Overall Approach to Continuous Quality Improvement at CWS

As part of the previous Stipulated Final Judgment, CWS revised many of the department's policies and procedures to improve overall performance and efficiency. CWS also reorganized the department into six key programs: Indian Child Welfare Act (ICWA), Continuous Quality Improvement (CQI), Workforce, Ongoing, Emergency Response (ER), and Permanency Placement (PP). Both quantitative and qualitative data is necessary to understand areas of success as well as areas for improvement. In 2017, Humboldt County CWS identified quality assurance as one of three main goals for their 2017-2022 System Improvement Plan (SIP) required by the California Department of Social Services (CDSS).

According to the *Humboldt County CWS CQI Manual*, the overarching goals of the CWS CQI Program are to:

- Implement and enhance an effective quality improvement system using qualitative and quantitative data
- Monitor compliance to local, state and federal regulations
- Facilitate data-driven decision-making to improve service delivery and outcomes

The CQI program is a coordinated and centralized program that institutes a formal circular feedback loop and leverages data to drive system change and facilitate improvements. According to the CQI manual, "the CQI program acts as the central office to coordinate robust data analysis and program evaluation using various qualitative and quantitative sources, including administrative data, qualitative case reviews, feedback from Tribes, community

stakeholders, CWS Office of Ombudsperson, Child and Family Services Review (CFSR) case reviews, CWS staff, and ongoing program compliance and evaluative reports. In return, the CQI program disseminates information to CWS management, administration and staff of its findings and assists in root cause analysis and the development of custom action plans to improve practice, service delivery and outcomes. The CQI program also works closely with Workforce Development and core programs to coordinate the implementation of continuous quality improvement activities rooted in data findings.” The CQI program is overseen by the CWS Deputy Director of Performance Management.

CWS approaches quality improvement from a variety of angles. Each program within CWS uses a wide variety of data to monitor and increase compliance to local, state and federal regulations. The CQI program staff track department-level data, while program-specific analysts track data for their program. Improvement strategies can be employed at the department level or at the program level. In some cases, analysis and subsequent action occurs at the program level if issues are arising within a specific program. CQI Quality Improvement Plans (QIPs) provide a dashboard for tracking data and strategies to improve performance at the department level. The QIPs are updated on a monthly basis and shared with staff to facilitate discussions around what the data shows and areas for improvement. This input is captured in the subsequent iteration of the QIP.

At the heart of the Department’s CQI program is a Model for Improvement (MFI) framework which creates an iterative process to keep CQI moving forward. This framework encompasses the following stages:

Stage 1. Create an AIM statement. This defines the goal for what is to be accomplished. Ideally identified with a team of stakeholders, the department guidance advises that aim statements have “SMART” characteristics:

S- Specific

M- Measurable

A-Achievable

R- Relevant

T- Time-bound.

Stage 2. Establish measures. Identify metrics and data sources to track performance on the identified aim.

Stage 3. Identify changes and determine strategies. This may be done using a focus group of stakeholders, research examining the evidence base, or an effort/impact matrix to identify appropriate strategies.

Stage 4. Test the changes. Review progress toward goal, assess effectiveness of strategies, and determine next steps.

CWS CQI utilizes the Plan, Do, Study, Act (PDSA¹) model. After the changes have been identified (Plan) and carried out (Do), the team evaluates (Study) the effect, either adapts, adopts, or abandons the intervention(s) and then develops the next step (Act).

The influence of this framework on the department's quality improvement activities is evident. With each monthly QIP and/or dashboard, metrics are assessed and interpreted, possible data gaps or underlying bias is investigated, and staff engages in brainstorming session to propose new strategies to pursue. CCRP has observed a number of these sessions. Implementation of strategies are documented so that the evolution of interventions, and their possible impact, can be tracked and reviewed over time.

In addition, every year a select set of performance measures are identified by program staff and CWS Administration as "key performance indicators" (KPIs). According to the CQI manual, "KPIs reflect specific targeted areas within each program to which focused attention and oversight will be conducted by CWS Administration based on a single strategic goal. The selection of the annual KPIs are program-driven and the measures selected align with the Department's Child Welfare Services' vision, mission, and operational principles." KPI-specific dashboards are updated quarterly and reviewed by CWS Administration, CQI program staff and CWS staff.

The CQI program also facilitates the California Child and Family Services Review (C-CFSR) process. The C-CFSR is California's quality assurance outcomes-based review system that ensures counties are continuously improving programs, services, and outcomes in the areas of safety, well-being and permanency for CWS-involved children and families. The C-CFSR is conducted by counties over a five-year cycle, which encompasses the County Self-Assessment (CSA) and Peer Review, which guide the subsequent five-year System Improvement Plan (SIP) and annual SIP progress updates.

CCRP did not review or verify documentation related to the KPIs or the C-CFSR as neither of these are specifically mentioned in the Stipulated Supplemental Judgment, and they were not identified during the first monitoring period as necessary to assess compliance with the Stipulated Supplemental Judgment. They are listed here to provide background on the broader scope and function of the CQI program, and to provide context on state-level processes and requirements to support all California Counties in continuous quality improvement efforts.

As it relates to the specific items in the Stipulated Supplemental Judgment, the CQI program has created the following tools to facilitate data collection and reporting:

- Monthly reports that summarize data from CWS/CMS and SafeMeasures
- Fidelity tools to measure and track Tribal collaboration

¹ PDSA is one of several variations of an iterative process improvement model, sometimes called plan-do-check-adjust, the Deming, Shewhart, or control cycle and is derived from the scientific method (hypothesis-experiment-evaluation).

- Quality improvement plans focused on mental health screenings and referrals and child and family team meetings.

CWS has also created a system reform “report card” which includes performance data covering a variety of areas, including staffing, intake, investigations, investigation performance measures, structured decision-making (SDM) for investigations, complaints/community feedback, Tribal collaboration, cases & placements, cultural coaching/training, and child outcome measures. CCRP observed, at one of the weekly ICWA meetings with the Tribes, a presentation where CWS shared data from the report card; the report card is one tool that CWS can use to share information about performance measures with the broader community.

As referenced above, CWS holds both weekly and monthly meetings to address items in the Stipulated Supplemental Judgment. CWS hosts a weekly ICWA meeting with all eight federally recognized Tribes & Rancherias, weekly CWS staff meetings focused on mental health screening and referrals, child and family team meetings, bi-monthly meetings with Evident Change, weekly Child Protection Reporting Guide meetings, and bi-monthly meetings with CCRP.

In regards to the weekly meetings with the Tribes and Rancherias, all are invited and most of them regularly attend. As noted above, the scope and focus of these meetings are broader than the Stipulated Supplemental Judgment. CWS facilitates these meetings and compensates Tribal representatives for their attendance to ensure that input from Tribes is consistently sought on a myriad of issues related to collaboration, including staffing and training of the ICWA unit and cultural coaches employed by CWS, progress on the Child Protection Report Guide (CPRG) and other issues as they arise. Based on CCRP’s initial observations, five of the local Tribes & Rancherias regularly attend and participate in the meetings. One Tribe that spoke with CCRP indicated that they have very few cases with CWS and do not have a need to attend the meetings. One of the other Tribes did attend some of the meetings that CCRP observed.

Monitor’s Assessment: CQI Program

During the period of monitoring (8/25/2021-10/31/2021) relevant to this report, CCRP did observe the CQI program in operation, however, a complete and independent assessment of progress will require additional time. The monitor will provide an update on this work in the next monitoring report. The monitor notes that the mission and work of the CQI program is broader than the specific issue areas listed in the Stipulated Supplemental Judgment. The monitor’s assessment focuses specifically on areas in the Judgment. In that regard, CCRP observed discussions among CWS administrators, supervisors, and analysts about the QIPs and collective work to identify and evaluate strategies designed to improve compliance with specific issues listed in the Stipulated Supplemental Judgment.

CCRP’s observations to date conclude that this is an iterative process. CWS staff review and analyze the data in the QIP, and then collectively interpret what the data is showing. For example, CWS staff discussed their perception that CFT meetings are occurring more frequently than CWS/CMS data is showing, and the possible reasons why. Is it a training issue, is it a data entry issue, is it a staff capacity issue- these are some of the questions posed and discussed by the team at the weekly CQI meetings. Discussion followed about how to study the possible reasons

in more depth- such as doing a sample review of cases to see if the data entry is correct, analyzing the data by programs to see if certain programs have lower compliance, resending desk guides or training materials to staff, surveying staff through brief polls or adding an item to the unit meeting for supervisors and analysts to discuss with front-line staff.

As CWS learns more about the “why” behind the numbers, strategies are adapted, implemented and then evaluated by reviewing the updated QIPs once a month. QIPs are updated on the 15th of each month and then shared with staff. The monitor also receives and reviews these reports as they are released. During the 8/25-10/31 monitor review, CCRP was able to observe this work at the weekly CQI meetings, but it was apparent that other work is happening between these meetings; it just cannot be verified by CCRP as time constraints did not allow CCRP to attend every CWS meeting that occurs.

IV. Overall Assessment of Progress

Overall, Humboldt County made measurable progress on the corrective actions in the Stipulated Supplemental Judgment between 2/14/2021-8/14/2021. Some corrective actions are still in progress or incomplete. The outstanding corrective actions are described in detail in the report but for summary purposes are outlined here. For a detailed assessment of progress, please see Section V & Appendix A.

Outstanding Corrective Actions: Case Reviews

Case reviews are required in three areas outlined in the Stipulated Supplemental Judgment and are in process as of 8/14/2021:

- Issue 2. New Investigative Decisions, Corrective Action #2
- Issue 3. Thorough Risk Evaluation, Corrective Actions #2-4
- Issue 6. Tribal Collaboration-Case Review, Corrective Action #2

Outstanding Corrective Actions: Child & Family Team Stakeholder Survey

Work to implement the Child & Family Team Stakeholder Survey is in process as of 8/14/2021.

- Issue 4. Timely Child & Family Team Meetings, Corrective Action #5

Outstanding Corrective Actions: Data Integrity & Progress on Annual Goals

As discussed below data integrity efforts must continue during the second monitoring period in several issue areas (Issues 1, 4 & 7) to ensure that data is being tracked and reported by staff in accordance with CWS policy and procedures. In addition, CWS must report on progress toward the annual goals for Issues 1 & 4.

Area 1. Interagency Protocol

Issue 1. Mental Health Screening & Referral

CWS has made substantive progress on this issue area and all of the associated corrective actions during the first monitoring period. Continued efforts by CWS to ensure data integrity and additional data verification by CCRP is still needed to assure full compliance for Action 1. Full compliance for Actions 2 & 3 will require verification that actions described in Section V continue through the end of the monitoring period, and further documentation of progress toward the annual goal that CWS has set for the percentage of cases with a timely mental health screening & referral will be necessary for full compliance with Actions 4 & 5.

CWS has made significant efforts to ensure that staff are trained to complete the Mental Health Screening Tool (MHST) for all open cases. All completed MHSTs are sent to County Mental Health; the determination about provision of services is at the discretion of County Mental Health. CWS has developed systems to coordinate and track data to monitor compliance with this policy. Data verification efforts are currently underway to ensure that all MHSTs sent to County Mental Health are tracked in CWS/CMS, and that MHSTs are completed in a timely manner according to department policy and procedure.

For each of the five corrective actions in this issue area, CCRP's assessment and a complete progress update is available in Section V.

Area 2. Implementation of New Emergency Response System and Revision of Policies and Procedures

Issue 2. New Investigative Decisions

CWS has made progress on this issue area during the first monitoring period. Full compliance for Action #1 will be achieved upon verification that actions taken by CWS described in Section V continue through the end of the monitoring period and independent verification of the data by CCRP. Full compliance for Action #2 will require completion of the case reviews by the end of the second monitoring period.

To ensure that the appropriate decision to either assign a new report for investigation or evaluate out to the ongoing social worker is consistently made per CWS' policies and procedures, CWS systematically requires and tracks supervisor-level approval of new investigative decisions through CWS/CMS. Independent data verification by CCRP will be conducted and reported on in the subsequent monitoring report.

Case reviews will provide another level of verification that CWS consistently adheres to policies and procedures that outline whether a new report is investigated or evaluated out to the ongoing social worker. CCRP recommends that CWS continue to work with Evident Change to complete case reviews, and that suggestions for case review criteria outlined in Section V are discussed and addressed by CWS & Evident Change. In addition, case review results and underlying supporting data must be provided to CCRP and Evident Change when complete. CCRP will review and verify results in consultation with Evident Change. Copies of the aggregated results from the case reviews will be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning as outlined in the Stipulated Supplemental Judgment. For each of

the two corrective actions in this issue area, CCRP's assessment and a complete progress update can be found in Section V.

Issue 3. Thorough Risk Evaluation

CWS has made progress on this issue area during the first monitoring period. The fidelity tools that will be used to conduct the case reviews related to Action #2 were developed by CWS in consultation with Evident Change. These Tribal collaboration fidelity tools will also be used for the case reviews specifically related to Area 3, Issues 5-7. They were created and developed by CWS in consultation with Evident Change as there were no existing case review tools designed to measure Tribal collaboration. The case reading tool that will be used to conduct the case reviews related to Action #3 was already developed by Evident Change. The actual case reviews were not completed during the first monitoring period. Full compliance for all corrective actions in this issue area will require completion of the case reviews by the end of the second monitoring period.

Case reviews will provide information that determines whether or not CWS conducts a thorough evaluation of the risk to any child who is the subject of a referral in accordance with policies and procedures. Further, the case reviews specified in Action #2 are being conducted to ensure that Tribes are routinely contacted as required to contribute to evaluations during intake and investigation.

CCRP recommends that CWS continue to work with Evident Change to complete case reviews, and that suggestions outlined in Section V for which questions to use from the case reading and fidelity to determine compliance are discussed and addressed by CWS in consultation with Evident Change. In addition, case review results and underlying supporting data must be provided to CCRP and Evident Change when complete. CCRP will review and verify results in consultation with Evident Change. Copies of the aggregated results from the case reviews will be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning as outlined in the Stipulated Supplemental Judgment.

For each of the four corrective actions in this issue area, CCRP's assessment and a complete progress update can be found in Section V.

Issue 4. Child & Family Team Meetings

CWS has made progress on this issue area during the first monitoring period. CWS is using CWS/CMS to document CFT meetings. Data integrity efforts are in process at CWS to ensure that all CFTs are documented in CWS/CMS. Data verification efforts by CCRP are partially complete. The CFT stakeholder survey is not yet implemented. To achieve full compliance with the Stipulated Supplemental Judgment, CWS must demonstrate that data integrity efforts have occurred, report on progress toward the annual goal, and implement the CFT stakeholder survey. The survey results and underlying supporting data must be provided to Evident Change and CCRP for verification. The survey results must also be provided to CWS Administration to inform practice changes and CQI strategic planning, as needed.

For each of the five corrective actions in this issue area, CCRP's assessment and a complete progress update is available in Section V.

Area 3. Tribal Collaboration

Both the County and Evident Change agree that there are limitations in the administrative data system CWS/CMS to capture data that measures collaboration with Tribes, making it very difficult to evaluate this area utilizing standardized reports. The case review process is the primary method available to the monitor to evaluate progress in this area. Tribal input can also supplement the monitor's assessment but the independent verification of input can only be achieved through case-by-case reviews, since administrative data is so limited. Based on requests from Tribal stakeholders, CCRP has asked to observe case reviews conducted by CWS staff during the second monitoring period.

Issue 5. Development of Fidelity Tool

CWS has completed the corrective action related to this issue. The fidelity tools that will be used to conduct the case reviews were developed by CWS in consultation with Evident Change. These Tribal collaboration fidelity tools will also be used for the case reviews specifically related to Area 2. They were created and developed by CWS in consultation with Evident Change as there were no existing case review tools designed to measure Tribal collaboration. Because these are newly completed and untested tools, CCRP will request evidence for the second report that demonstrates CWS has engaged with Evident Change and Tribal stakeholders to fine-tune the tools to ensure that they are adequately measuring adherence to CWS policies and procedures related to Tribal collaboration.

Issue 6. Case Reviews

CWS made progress during the first monitoring period but has not yet completed this corrective action. CCRP recommends that CWS continue to work with Evident Change to complete case reviews and review suggestions made by CCRP in Section V of the report. CCRP agrees with the determination reached by CWS in consultation with Evident Change that comparative case reviews should be conducted by both entities, since the Tribal fidelity tools were developed specifically for the case reviews required by the Stipulated Supplemental Judgment and will benefit from a comparative review to ensure that case reviewers interpret the tool consistently and produce reliable results.

In addition, to achieve full compliance, case review results and underlying supporting data must be provided to CCRP and Evident Change. CCRP will review and verify results in consultation with Evident Change. Copies of the aggregated results from the case reviews must be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning as outlined in the Stipulated Supplemental Judgment.

Issue 7. Tracking/Reporting Contacts with Tribal Representatives

CWS has made progress on the corrective actions related to this issue. Administrative data in CWS/CMS is limited and there are no standard reports available in SafeMeasures, so CWS uses

a business intelligence tool to create a custom report with this information. Due to time constraints, CCRP was not able to independently verify the data for the first monitoring period. However, CWS staff did do a demonstration of the process they use for this action for CCRP.

CCRP recommends that CWS implement a QIP for this action, similar to the process being used for MHSTs and CFTs to document efforts and facilitate discussions with CWS staff and administration to better understand gaps that may be occurring in data entry and identify strategies to improve compliance.

V. Progress on Items in Stipulated Supplement Judgment

Area 1. Interagency Protocol

Issue 1. Mental Health Screening and Referral

Paragraph 3.C of the Stipulated Final Judgment:

CWS and the Mental Health division of DHHS are currently developing an inter-agency collaboration protocol to ensure that staff from the divisions coordinate the provision of mental health and child welfare services. The protocol shall address the sharing of confidential information between the divisions and include revised processes to ensure timely assessments of children in protective custody. CWS has also created procedures to address the sharing of information among other agencies and entities that are a part of a multidisciplinary team, including, but not limited to, medical personnel, law enforcement officers, school district employees, and tribal representatives, pursuant to Welfare & Institutions Code sections 5328 & 5328.04.

As of February 2021, CSSP opined that no system-wide data was available to CWS to ensure coordination of mental health and child welfare services.

Background

The State of California- Department of Social Services ACL 15-11 (3.24.2015) states that county child welfare departments are responsible for ensuring that every child or youth with an open child welfare case is screened for possible mental health needs at intake and at least annually thereafter. All children are referred to County Mental Health by sending the completed screening tool. If a child's screen is positive, County Mental Health contacts the child to coordinate a full, clinical mental health assessment.

Humboldt County CWS Policy 09-67 states that a behavioral health screening is to be provided to all children/youth involved with CWS while they remain at home after an investigation or are placed in foster care. The screening is to be completed within 30 days from promotion to a case, and annually thereafter. When a child is affiliated with a Tribe, CWS is to contact the Tribe to jointly complete the screening.

Corrective Actions

Action 1: CWS shall use the California statewide automated child welfare information system, CWS/CMS, to document all mental health screenings and referrals made to County Mental Health for children in an open CWS case.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made substantive progress on Action 1. CWS is using CWS/CMS to document mental health screenings and referrals made to County Mental Health for children in an open CWS case. Data integrity efforts by CWS are in process to ensure that all screenings and referrals are documented in CWS/CMS and cross-reported to County Mental Health. Data verification efforts by CCRP to ensure that tracking and cross-reporting are occurring according to policy are partially complete. Evidence of continued data integrity efforts by CWS are necessary to achieve full compliance, and continued monitoring and verification by CCRP will be conducted during the second monitoring period.

Progress Update

CWS has taken multiple steps to ensure that 1) CWS/CMS is used to document all mental health screenings and referrals, and 2) a documented process is in place to systematically screen and refer cases to DHHS Mental Health. CWS requires staff to attend a Mental Health Screening Tool (MHST) training and provided the following training and reference materials to all staff on 7/12/2021:

- Data Entry Desk Guide- MHST 2.0 in CMS: This document provides step-by-step instructions with CWS/CMS screenshots for recording completion and submission to Mental Health of the MHST 2.0.
- CWS Policy & Procedure 09-67: Current CWS policy and procedure for mental health screening and referral.
- MHST 2.0 Overview: Training slides on the new MHST 2.0.
- MHST 2.0: Blank copy of the MHST 2.0. A fillable MHST 2.0 is available in CWS/CMS. All completed MHST's should be saved in CWS/CMS following the instructions in the Data Entry Desk Guide.
- CANS Supplemental Questions for MHST: This document provides prompts to encourage engaging conversations to gather useful information to rate each item on the MHST 2.0.

All case carrying social workers need to complete the MHST training and the MHST 2.0 is a required assessment for all CWS cases. MHST 2.0 overview training is also now available on the County Learning Management System (LMS) NeoGov. Documentation provided by CWS shows that a majority of staff (79%) have completed the MHST 2.0 training. As this training is available to staff on an ongoing basis, and CWS supervisors continue to monitor completion of this training, CWS has a system in place to ensure that the remaining 21% of staff and any newly hired staff are aware of and complete this training.

CWS has two levels of oversight related to completion of staff trainings. For CWS-specific trainings, supervisors receive monthly reports from the workforce and training program with information about completion of trainings. Supervisors have the discretion to address gaps in training completion in regular annual performance reviews that are conducted with staff. For DHHS-wide trainings, training completion is tracked in an online system. As this item relates specifically to completion of the MHST training, which is not a DHHS training or a training mandated by the State, CCRP requested, received and reviewed the tracking spreadsheet specific to this training for verification purposes.

CCRP requested training information and materials related to this corrective action to assess whether adequate training is provided for staff to use CWS/CMS to document all mental health screenings and referrals made to County Mental Health. Based on review of documentation that has been provided to date, CCRP's assessment is that CWS does have the necessary infrastructure for staff to receive both training and supplemental documentation including a desk guide that outlines the step-by-step process to utilize the CWS/CMS system for this purpose. CCRP will request updated data regarding the percentage of staff who have completed the training and reassess completion of the training at the end of the second monitoring period.

To systematically track all mental health screenings and referrals, the following data integrity process has been created by CWS:

MHSTs are emailed by CWS to the MHST email box, which is a shared email box between CWS and County Mental Health. County Mental Health staff monitor the email inbox for incoming referrals from CWS and move processed referrals to the "processed" folder. The prior month of MHSTs that have been sorted into a "processed" folder in the MHST email are then reviewed by CWS to check for accuracy against the entries made in CWS/CMS. After the prior month's MHSTs are collected, a report is run on the associated cases to get the email information of primary and secondary social workers. An email is then sent to those social workers and CWS clerical making them aware that CQI will be in those cases, making updates and to stay out so work is not lost. A calendar item is also sent to the same group that received the email as a reminder. When the scheduled time arrives, each processed MHST is checked against the data entry in CMS/CWS.

CWS CQI staff will continue to monitor the MHST email box to ensure that all MHSTs sent to Mental Health via email are correctly documented in CWS/CMS.

Independent verification of the process to assure data integrity was not done by CCRP between 8/25/2021-10/31/2021 due to time constraints. CCRP did observe several meetings where CWS staff discussed these activities and how duties were being assigned to staff. CCRP intends to verify that each of the steps outlined for tracking and cross reporting are occurring and will provide an updated assessment in the second monitoring report. This will likely be done by comparing referrals in the processed folder to CWS/CMS entries for a selection of cases. CCRP will also provide continuous real-time monitoring of this requirement for the duration of the second monitoring period.

Action 2: CWS shall track and report mental health screening and referral data from CWS/CMS, including the number and proportion of children in an open CWS case who have had a timely screening and referral to mental health services. Any actual assessment pertaining to specific recommendations of mental health services are determined by County Mental Health and not CWS.

Monitor Assessment (2/14/2021-8/14/2021)

This action has been completed, and full compliance will be achieved upon verification that actions described below continue through the end of the monitoring period. CWS has provided evidence which has been independently verified by CCRP. CCRP independently ran reports in SafeMeasures to verify that CWS tracks mental health screening and referral data in CWS/CMS. CCRP will continue to monitor and verify that CWS tracks and reports mental health screening and referral data from CWS/CMS in monthly reports, including the number and proportion of children in an open CWS case who have had a timely screening and referral to mental health services.

Progress Updates

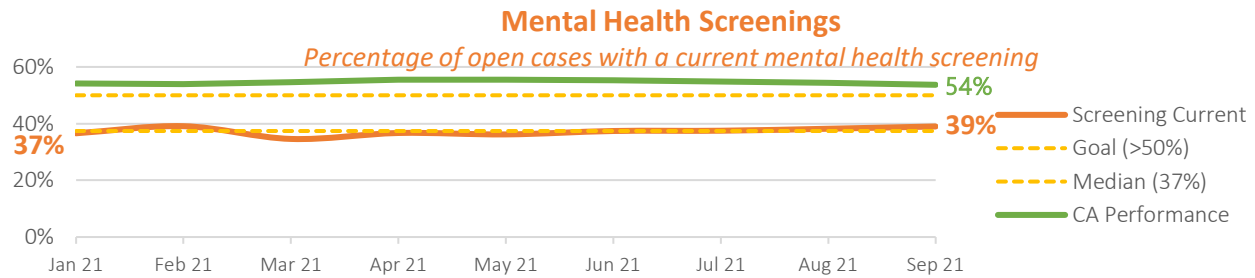
Reports related to mental health screening and referral data entered in CMS/CWS is accessed through SafeMeasures. Daily reporting is available in SafeMeasures. All Social Workers, Supervisors, Analysts, Managers, Deputies and Directors can access the data for daily updates. SafeMeasures pulls data from CMS/CWS on a daily basis that shows whether the client has a current mental health screening. The report sets the initial due date at 45 days from the case opening. All subsequent due dates are set 12 months from the most recent screening. SafeMeasures reports produce the number and proportion of clients with a complete screening, an overdue screening, or a pending initial screening.

All completed screenings result in a referral to County Mental Health; all actual assessments pertaining to specific recommendations of mental health services are determined by County Mental Health and not CWS. CWS did provide documentation to CCRP showing that, during February 2021-August 2021, 100% of screenings resulted in a referral to County Mental Health.

According to a report run by CCRP in SafeMeasures, a total of 122 mental health screenings were completed between February 2021-August 2021. Pertinent to the language in Action #2 that references the number and proportion of children in an open CWS case who have had a timely screening and referral to mental health services, please see data in Figure 3 pulled from SafeMeasures by CCRP.

Figure 2 illustrates the percentage of timely screenings completed. This chart was pulled directly from QIP #21-01, and is updated each month and shared with staff. CCRP has verified that this is occurring by the receipt and review of the reports. Figure 3 reflects both the number and proportion of timely screenings compared to the overall number of cases.

Figure 2. Mental Health Screenings: Percentages of Open Cases with a Current Screening



This chart uses an initial due date of 45 days from case opening. All subsequent due dates are set 12 months from the most recent screening. Excludes Non-Dependent Legal Guardianship cases and cases for youth over age 20.

Data Source: CWS/CMS, January-September 2021

Figure 3. Number and Percentage of Children in an Open CWS who have had a Timely Screening and Referral to Mental Health Services by Month*

Month	Screening Current		Screening Overdue		Cases Overall Total
	#	%	#	%	
February 2021	224	39.1	349	60.9	573
March 2021	199	34.6	376	66.5	575
April 2021	208	36.7	358	63.3	566
May 2021	202	36.2	356	63.8	558
June 2021	210	37.4	351	62.6	561
July 2021	200	37.7	331	62.3	531
August 2021	200	38.8	316	61.2	516

*This table excludes Non-Dependent Legal Guardianship cases and cases for youth over 20 years of age.

Action 3: Compliance reports relating to CWS’ screenings and referrals to County Mental Health shall be provided to CWS Administration on a monthly basis.

Monitor Assessment (2/14/2021-8/14/2021)

This action has been completed, and full compliance will be achieved upon verification that actions described below continue through the end of the second monitoring period. Compliance reports relating to CWS’ screenings and referrals to County Mental Health are available to CWS staff and administration in SafeMeasures. In addition, compliance data is being provided to CWS staff and administration on a monthly basis as of July 2021 as part of QIP #21-01. CWS has provided evidence of these reports and the data contained within them has been independently verified by CCRP. CCRP will continue to monitor and verify that CWS provides monthly compliance reports throughout the duration of the monitoring period. CCRP will continue to review and assess the QIP each month at the time of its release and independently verify the data in SafeMeasures.

Progress Updates

CWS has been utilizing SafeMeasures to access mental health screening data and daily compliance reports are available to a variety of staff, including CWS administration. CCRP has

independently reviewed and verified that compliance data related to mental health screening and referrals is available in SafeMeasures. Monthly compliance reports are also compiled by CWS CQI and integrated into QIP #21-01- the dashboard and compliance report that tracks timely mental health screening and referral for the department. CCRP verified that monthly reports are compiled and integrated into QIP #21-01 by reviewing each report when it is released on the 15th of each month. CCRP also independently ran and verified the data in SafeMeasures to confirm that the data presented in the report was accurate.

CWS CQI is also using QIP dashboard #21-01 to document strategies to improve compliance at the department level. QIP #21-01 serves as the compliance report for Action #3, though this information is also readily available to and accessible to staff through SafeMeasures. CWS updates and shares the QIP on a monthly basis (15th of each month) with CWS administration & supervisors. CWS administrators, CQI staff, program supervisors and program analysts meet on a weekly basis and agendas for these meetings include the review of the QIP, discussing and fine-tuning strategies to improve compliance, and setting goals for improvement. CCRP attends these meetings as well for monitoring and verification purposes.

Action 4: CWS shall establish an annual goal for the proportion of timely screening and referrals made to Mental Health.

Monitor Assessment (2/14/2021-8/14/2021)

This action has been completed. CWS has established an annual goal for 2021; the goal was established in July 2021. The goal is that 50% of cases will have timely screening and referrals made to Mental Health by 12/31/2021. CCRP reviewed the goal, baseline data, and statewide performance and agrees that this is a reasonable annual goal for 2021.

Progress Updates

During the first monitoring period, CWS established an annual goal of 50% by 12/31/2021 for the proportion of timely screening and referrals made to Mental Health. The current performance statewide is 54%. CWS established a specific, measurable, achievable, reasonable, and time-bound goal (SMART). Statewide performance was also reviewed to ensure the county is near the performance of counties across California.

The goal is documented in QIP #21-01. The plan is updated monthly with current data and discussed with CWS CQI and program staff at the ongoing MHST meetings on a monthly basis. CCRP observed these meetings to verify that the QIP is updated and discussed with CWS for continuous quality improvement purposes. Specific strategies to improve the percentage of timely mental health screenings and referrals were still being discussed as of 8/31/2021; additional information about the strategies being employed by CWS to improve compliance will be included in the subsequent monitor's report. Initial efforts to improve compliance that were discussed early on centered around ensuring that staff are trained and have desk guides with step-by-step procedures on how to track mental health screenings in CWS/CMS and cross-report those screenings to County Mental Health. CWS CQI also set up data review processes to better understand gaps in data compliance which are discussed under Action #1.

Action 5: If CWS falls below the goal for two consecutive months, CWS shall initiate a quality improvement plan to increase compliance to the established goal.

Monitor Assessment (2/14/2021-8/14/2021)

This corrective action is not applicable to the first monitoring period. The annual goal for 2021 is that 50% of open cases will have a timely screening and referral to County Mental Health. Progress toward that goal will be assessed during the second monitoring period. If CWS falls below the goal of 50% for two consecutive months, CWS shall enhance their existing quality improvement plan to increase compliance to the established goal.

Progress Updates

CWS CQI proactively established a quality improvement project to support the department in reaching the annual goal for 2021. The stated purpose of QIP #21-01 is to monitor and improve compliance towards timely mental health screening and referral, as well as provide program staff updated data that will support continuous quality improvement.

As referenced above CWS CQI developed a quality improvement plan (QIP #21-01) to monitor progress and identify strategies to increase the proportion of timely screening and referrals made to Mental Health to 50% by 12/31/2021. #QIP 21-01 was initiated on July 1, 2021. The QIP serves multiple purposes: 1) it is a compliance report that pulls monthly data from SafeMeasures, 2) it states the annual goal, and 3) it tracks the strategies taken by staff to improve compliance and achieve the annual goal.

Area 2. Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendants

Issue 2. New Investigative Decisions

Paragraph 3.E of the Stipulated Final Judgment:

CWS shall ensure compliance with CANRA, including the confidentiality requirements set forth under Penal Code section 11167, and CANRA's implementing regulations set forth in California Code of Regulations, Title II, division I, chapter 9, including regulations relating to investigations of suspected child abuse in out-of-home care facilities, and the Welfare and Institutions Code and Division 31 regulations.

In February 2021, CSSP opined that CWS had not taken steps to review and ensure adherence to CWS' policies and procedures implementing Paragraph 3.E. of the Stipulated Final Judgment; more specifically, that the appropriate decision to either assign a new report for investigation or evaluate out to the ongoing social worker was not consistently made per CWS' policies and procedures.

Background

According to CWS P&P 18-03, California's Child Abuse and Neglect Reporting Act (CANRA) protects children by mandating the reporting of child abuse and neglect, and ensuring the

investigation of every report through a system of cross-reporting and information-sharing among child protective agencies. Humboldt's policy further states that "CWS believes, commits to, and expects collaboration with the identified Tribe to begin at time of Intake and/or first contact. The agency's key objective for Native American families is to maintain and foster the child's connection with the Tribe." To ensure compliance with CANRA and related regulations, CWS must consistently adhere to policies and procedures regarding new investigative decisions for all referrals.

Corrective Actions

Action #1: A CWS supervisor shall continue to review and approve all reports received, including those involving children in out-of-home care. All reports shall continue to require electronic supervisor approval of the determined response in CWS/CMS.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made substantive progress on this corrective action. Full compliance will be achieved upon verification that actions described below continue through the end of the second monitoring period. CWS supervisors review and approve all reports received, including those involving children in out-of-home care. Reports require electronic supervisor approval of the determined response in CWS/CMS. CWS has provided evidence including raw data that showed that supervisor approval was systematically tracked in CWS/CMS. Independent data verification by CCRP will be included in the subsequent monitoring report.

Progress Updates

CWS supervisors continue to review and approve all reports received, including those involving children in out-of-home care. After a screener takes a report they submit it to a supervisor for approval. All screeners take reports live and enter everything into CWS/CMS as they are on the phone with the reporter. The supervisor reviews the screener narrative in CWS/CMS, which includes a write-up of all of the information provided by the reporting party (RP) and also includes any notes on contacts made with Tribes in follow-up to the report taken. Then the supervisor reviews the SDM hotline tool that the screener completed in WebSDM to make sure there is agreement with the completed hotline tool responses. The hotline tool is the decision-support tool used for all reports to determine whether it meets criteria for assigning for an investigation or should be evaluated out. Counties are required to use the SDM hotline tool for making this determination. Next, the supervisor goes into CWS/CMS and approves the "determine response" section, and if it is going to be investigated, they assign it to the worker who will do the investigation.

CCRP requested and received a report generated from CWS/CMS to verify the information provided in the above paragraph. The report lists all referrals closed between 1/1/2021 and 12/2/2021 along with the most recent approval status. A total of 2,609 referrals were closed during that time frame. Ninety-eight percent (2,550) were approved by a Social Worker Supervisor and one percent (31) were approved at a higher level, by a Program Manager. Two referrals were approved by a Senior Analyst or Senior Office Assistant- in these two cases they were originally

approved by a Social Worker Supervisor but the referral was re-opened for data clean-up activities. Twenty-five referrals (1%) were listed as pending approval. The report provided raw data with the information summarized above. CCRP intends to independently run this report to verify data for the second monitoring period. CCRP also received information generated by CWS/CMS that describe the requirements for approving and closing a referral in CWS/CMS. This documentation indicates that supervisor approval is a required step in order to close a referral in CWS/CMS. The CWS/CMS instructions indicate that “you must have Supervisor authority or Approval authority to select anything but ‘pending referral.’”

Action #2: In consultation with the child welfare expert, the California SDM Intake Supervisory Referral Reading fidelity tool shall be used to review a sample of reports received that involved children in an open case or referral to determine whether an appropriate response decision was made per policy. The scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert. Reviews involving reports that include Native American children will be conducted by CWS’ Indian Child Welfare Act (ICWA) Program. Reviews involving all other reports will be conducted by CWS’ Continuous Quality Improvement (CQI) Program. Case review results and underlying supporting data shall be provided to the child welfare expert and the compliance monitor for verification. Aggregated results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Action #2, though the actual case reviews were not completed as of 8/14/2021. The scope, timing and sample size of the reviews was actively being worked on collaboratively by CWS and Evident Change as of 8/14/2021; details were not finalized at that time. The primary work done in the first monitoring period was focused on planning for and designing the case review process and guidelines, and identifying the appropriate staff to conduct the reviews.

CCRP has reviewed the case reading tool for this action and provided the following guidance to ensure that case review results will assess the degree to which an appropriate response decision to either assign a new report for investigation or evaluate out to the ongoing social worker was made per policy. Specific to this corrective action, the SDM Intake Supervisory Referral Reading tool should be used to review referrals to determine the proportion of reviews where question #4- “Was the correct screening decision reached?” of the tool was answered yes.

Progress Updates

Evident Change reported that CWS has worked to build agency infrastructure to support routine supervisory case reading practice during the first monitoring period. CWS supervisors and program managers (including CQI and ICWA programs) have mandatory monthly meetings to conduct joint reviews using the SDM Case Reading Tools to build internal capacity and skill with utilizing this fidelity tool. Evident Change and CCRP supports the continuation of monthly meetings to build staff capacity to conduct case reviews as well as to identify actionable next

steps based on results from the case reviews. CWS has also continued data collection to maintain the SDM Case Reading Dashboard to support future CQI efforts based on results.

The scope, timing and sample size of the reviews is being developed in consultation with Evident Change as of 8/14/2021. The draft of the document outlining the process was provided to CCRP. The reviews will be conducted during the next monitoring period.

CCRP requested additional information from CWS as to actions staff are taking to ensure random selection of cases to be reviewed. CWS shared that the process is as follows:

- Generate a report containing all cases that meet criteria within the time period under review.
- Randomize by adding a column with a =RAND() function on each row of the data within Excel.
- Sort data set from lowest to highest.
- Extract from the first data row consecutively until the desired number of referrals or cases is reached.

CWS indicated that Evident Change suggested the Excel randomization method during a collaborative meeting.

As part of the consultation with Evident Change on the design of the case review process, CWS shared plans for the following changes to the structure of ongoing case reading practice to better meet the goals of supervisory case reading as an ongoing CQI process. Evident Change has reviewed and supports these changes.

- Ensure random selection of referrals or cases being reviewed.
- Move from all supervisors jointly reviewing the same referral or case toward the stated goal of supervisors completing one review per month per social worker.
- Develop a clear plan for enhancing feedback loops to ensure that social workers receive relevant feedback to improve practices, and key themes across workers can be addressed through system infrastructure and resourcing.
- Continue to refine data collection practice to ensure that data for case reviews is entered correctly and completed.

The other changes listed above are still in progress as of 8/14/2021. CCRP will verify the steps that CWS has taken to implement the other changes that were discussed with Evident Change and that information will be shared in the next monitoring report. CCRP will also request documentation to ensure that the implemented changes are reviewed and supported by Evident Change, as well as the benchmarks being used to track results associated with the changes.

Issue 3. Thorough Risk Evaluation

Paragraph 3.K of the Stipulated Final Judgment:

As set forth in Welfare & Institutions Code section 16504, CWS shall conduct a thorough evaluation of the risk to any child who is the subject of a referral. The evaluation of risk shall

include information gathered from all collateral contacts who may have relevant information related to the referral. Collateral contacts may include (but are not limited to) school personnel, law enforcement, tribal representatives, medical personnel, and other community members. When necessary to complete the evaluation of risk to the child, the investigating social worker will contact the reporting party (whether mandated or not) for further information. Consistent with Division 31 regulations, section 31-105.1.11.114, CWS screeners and investigators shall record detailed information (as available) regarding any contact with collateral contacts, which may include the (1) date of contact; (2) name and phone number of each person contacted; (3) agency affiliation or person's relationship to the child; (4) contacts with tribe(s), extended family, Indian organizations, or other Indian service providers; and (5) summary of information obtained. The use of all collateral contacts and other available resources should also be used to obtain information related to the location of children and families who are the subject of referrals, consistent with DSS All County Information Notice No. 1-52-14.

In February 2021, CSSP opined that steps were needed to verify adherence to policy, including that Tribes were not being routinely contacted as required to contribute to evaluations during intake and investigation.

Background

CWS Policy & Procedure (P&P) 18-03 outlines screening procedures that instruct screening social workers to “ask all callers whether they have any information that would lead them to believe this may be a tribal child.” When a report involves a child who is enrolled in or eligible for enrollment in a federally recognized Tribe, CWS cross reports the referral to the identified Tribe (s) and collaborates with the Tribe to investigate assigned referrals. CWS P&P 18-12 further specifies that collaboration between Tribal and county social workers will occur during the response, investigation, and remediation of referrals and cases of child abuse and neglect involving Indian children.

Corrective Actions

Action #1: CWS shall, in consultation with the child welfare expert, develop an intake and investigation fidelity tool that measures CWS' adherence to its policy that tribes are to be routinely contacted, as required, to contribute to evaluations during intake and investigations.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has completed Action #1. Both an intake and an investigation fidelity tool have been designed by CWS in consultation with Evident Change. There are no existing fidelity or case reading tools to measure Tribal collaboration to guide CWS or Evident Change in this process. The tools have been designed with input from Evident Change and the Tribes as described below. There are ongoing discussions about how to fine-tune the completed tools so they function as intended for the case review process (see Actions #2, 3 &4). These fidelity tools are also being used for the case reviews required for Area 3- Tribal Collaboration. The tools are being assessed as complete because the basic tool has been designed and utilized; slight refinements may be made to increase the effectiveness of the tool as it is tested through

comparative case reviews by CWS and Evident Change. CCRP believes this is good practice since the tool is new and it should be assessed for effectiveness and updated accordingly as it is used by case reviewers.

An independent verification of the fidelity tools was not possible given that a case-specific review would be necessary to determine if existing records contain adequate information to answer the questions in the fidelity tool, and case reviews were not completed during the first monitoring period. However, CCRP did review and match the fidelity tools to relevant CWS policies and procedures and can verify that the two fidelity tools do align with existing department policy and procedures.

Progress Updates

CWS has developed two fidelity tools that measure adherence to policy regarding Tribal contact and collaboration during intake and investigation. The first is the Intake-Supervisor Tribal Collaboration Checklist and the second is the Investigation- Supervisor Tribal Collaboration Checklist. These tools are based on policy that was co-created by CWS and County Tribes prior to the first monitoring period of the Stipulated Supplemental Judgment. These tools are also being used to address the Tribal collaboration area of the Stipulated Supplemental Judgment and are discussed in that section as well.

Evident Change reviewed the contents of the review tools and discussed feedback with CWS on April 1, 2021. Written feedback was also provided to CWS by email. Evident Change strongly recommended two action items: 1) The development of clear definitions for the items on each tool, and 2) Incorporation of Tribal stakeholder feedback on each tool. Evident Change and CWS met on July 30 to discuss the recommendations, at which time CWS shared concern about the ability to co-create, review, and revise all definitions for the review tools in a timely way given the requirement that case reviews occur during the period of time covered by the Stipulated Supplemental Judgment.

In lieu of co-creating definitions for the fidelity tools, the CWS CQI Program Manager conducted qualitative interviews with Tribal representatives to gather feedback on the current Tribal collaboration process. Evident Change supported the use of qualitative interviewing and provided technical assistance to CWS focused on interview techniques and coding of data. CCRP recommends that results from the interviews be shared back with Tribes to facilitate additional feedback on Tribal collaboration. In addition, Evident Change and CWS are developing a comparative case review process for the second monitoring period that will determine if questions on the tools are interpreted consistently across reviewers.

In addition to the fidelity tools, CWS has developed and piloted the CWS Intake/Investigation Review Guide to assist the department in ensuring adherence to policy and procedures. This guide was not reviewed or assessed by CCRP as it is not a specific requirement of the Stipulated Supplemental Judgment.

Action #2: In consultation with the child welfare expert, a review shall be conducted of a sample of reports received involving Native American children utilizing the above referenced

fidelity tool. The scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Action #2, though the actual case reviews are not complete. The scope, timing and sample size of the reviews were actively being worked on collaboratively by CWS and Evident Change as of 8/14/2021; details were not finalized. The primary work done during the first monitoring period was focused on planning for and designing the case review process and guidelines. CCRP did observe meetings after 8/14/2021 where case studies were discussed; this progress will be included in the second monitoring report.

Progress Updates

Tribal fidelity tools referenced in the report were designed by CWS with input from Evident Change during the period of time covered by the previous Judgment. The tools were based on policy and procedures developed collaboratively with the local Tribes. An initial review was conducted using the intake fidelity tool to test the tool and gather preliminary data. Between January 1, 2021 and February 18, 2021, the intake checklist was completed for all referrals received by CWS during that period that involved a Tribal child. Aggregated results from the completed reviews were shared with Tribes on March 19, 2021. These initial reviews were conducted prior to the Stipulated Supplemental Judgment and the information is shared in this report to give full context on process used to design and implement Tribal fidelity tools. While these reviews are similar to those that are discussed in the paragraph below, they are not considered by CCRP to fulfill Action #2. Additional information about the initial review can be found in this section under Area 3- Tribal collaboration.

The case reviews to comply with the Stipulated Supplemental Judgment will be completed during the next monitoring period. The scope, timing, and sample size of the reviews are being developed in consultation with the child welfare expert as of 8/14/2021. The draft document describing the current plans was provided to CCRP, and CCRP has reviewed several iterations of the plan. However, details are not finalized. CCRP will include the final details on the scope, timing, and sample size in the subsequent monitoring report, as well as results from the completed case studies.

Action 3: In consultation with the child welfare expert, CWS shall continue to use the California SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading tool to review reports investigated to determine whether an appropriate risk assessment was made per policy. The scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Action #3, though the actual case reviews are not complete. The scope, timing and sample size of the reviews was actively being worked on collaboratively by CWS and Evident Change as of 8/14/2021; details were still not finalized by the end of the first

monitoring period. The primary work done in the first monitor period was focused on planning for and designing the case review process and guidelines.

CCRP has reviewed the case reading tool for this action and provided the following guidance to ensure that case review results will determine whether an appropriate risk assessment was made per policy. CCRP recommends that the risk assessment portion of the tool should be used to make this determination. The following question should be assessed by the percentage of reviews where the answer to Question 4 was “Yes.”

- Question 4: Was the final tool recommendation correct?

Progress Updates

The case reviews will be completed during the next monitoring period. The scope, timing, and sample size of the reviews are being developed in consultation with Evident Change as of 8/14/2021. The draft document describing the current plans was provided to CCRP, and CCRP has reviewed several iterations of the plan. However, details are not yet finalized so definitive numbers and information is not available. CCRP will include the final details on the scope, timing, and sample size in the subsequent monitoring report.

Action 4: The results of the reviews conducted and underlying supporting data shall be provided to the child welfare expert and the compliance monitor. Aggregated results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning.

Monitor Assessment (2/14/2021-8/14/2021)

This action is not applicable to the first monitoring period.

Progress Updates

A progress update will be provided in the subsequent report.

Issue 4. Child and Family Team Meetings

Paragraph 3.M of the Stipulated Final Judgment:

In consultation with the parties’ agreed-upon expert consultant, National Council on Crime and Delinquency- Children’s Research Center (“NCCD”), CWS shall select and implement a family meeting model that uses a strengths-based approach to engage families, formal and informal support, communities, and tribes in a family-led planning process over the life of the case at key decision points. The model shall include a combination of family meeting types that encompass the core elements outlined in best practices, such as pre-meeting coordination and preparation, consensus-based decision making, and family team involvement in creating case plans and follow-up activities.

In February 2021, CSSP opined that CWS was holding Child and Family Team (CFT) meetings at a rate significantly lower than expected by policy.

Background

According to California Welfare & Institutions Code (WIC) Section 16501.1(a) (1), the foundation and central unifying tool in child welfare is the case plan. In part, the case plan shall be based upon input from the child and family team (CFT).

Per ACL 17-104, since January 1, 2017, county child welfare and probation departments have been required to convene CFT meetings as part of the case planning process for children, youth, and nonminor dependents who enter foster care. This requirement also applies to children, youth, and nonminor dependents in a foster care placement prior to January 1, 2017.

Initial CFT meetings are required within 60 days of removal. Ongoing CFT meetings are required every six months unless a stricter frequency is specified.

Corrective Actions

Action #1: CWS shall continue to use the California statewide automated child welfare information system, CWS/CMS to document all CFT meetings held.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made substantive progress on Action 1. CWS is using CWS/CMS to document CFT meetings. Data integrity efforts are in process by CWS to ensure that all CFTs are documented in CWS/CMS. Data verification efforts by CCRP are partially complete.

Progress Updates

CWS has developed a desk guide for staff that provides guidance on how to document all CFT meetings in CWS/CMS. The following document was provided as evidence:

- Desk Guide- Child & Family Team Meeting Documentation in CWS/CMS

According to SafeMeasures, between February and August 2021 a total of 53 qualified CFTs were held. CCRP independently verified this number by running a report in SafeMeasures (see Figure 5). CWS utilizes regular SafeMeasures reporting to examine CFT meeting completion from a quantitative standpoint. Evident Change supports the use of SafeMeasures for this purpose because it is easily accessible to CWS staff at all levels and provides up-to-date information on completion rates.

CWS has reported to CCRP that they have identified some potential gaps in the data entry process for this corrective action. While CFT meetings are being documented in CWS/CMS, there are a lot of boxes that staff must check to ensure that the CFT meeting appears in a SafeMeasures report. For example, one of the requirements for a qualified CFT meeting is that the child be present. CWS has identified this as an area that is preventing some of the meetings from qualifying as an official CFT. CWS surveyed staff to understand the barriers that staff are facing to meet this particular qualification. According to staff feedback, the two primary barriers are 1) There is no guidance for what staff should do when a child is too young to participate, and 2) There is no guidance for what staff should do when the topics to be discussed at the meeting could potentially further traumatize the child.

Continued efforts by CWS to ensure data integrity and additional data verification by CCRP is still needed to achieve full compliance by the end of the second monitoring period.

Action #2: CWS shall track and report CFT meeting data from CWS/CMS, including the number and proportion of children in an open CWS case who have had a timely CFT meeting.

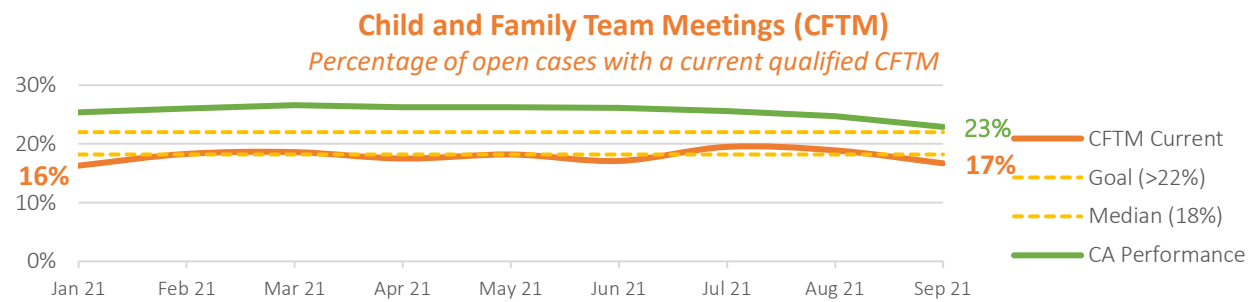
Monitor Assessment (2/14/2021-8/14/2021)

This action has been completed. CWS has provided evidence which has been independently verified by CCRP. CCRP independently ran a SafeMeasures report to verify the number and proportion of children in an open CWS case who have had a timely CFT meeting. CCRP will continue to monitor and verify that CWS tracks and reports CFT data from CWS/CMS in monthly reports, including the number and proportion of children in an open CWS case who have had a timely CFT meeting. Continued monitoring will be conducted in order for CWS to achieve full compliance with this corrective action.

Progress Updates

A CWS CQI analyst generates a monthly report using SafeMeasures that shows CFT status by case. The report is included in QIP #21-02, the quality improvement plan that serves as the compliance dashboard for this issue. CCRP received, reviewed, and verified that monthly reports are being generated. CCRP participated in meetings with CWS where QIP #21-02 was discussed with staff in accordance with CQI guidelines established by CWS. Figure 4 is pulled directly from QIP #21-02. Data for Figure 5 was pulled from SafeMeasures by CCRP.

Figure 4. Child and Family Team Meetings: Percentage of Open Cases with a Timely CFT



Initial CFTMs are required within 60 days of removal. Ongoing CFTMs are required every 6 months unless a stricter frequency is

Data Source: CWS/CMS, January-September 2021

Figure 5. Number and Percentage of Children in an Open CWS Placement who have had a Timely Child and Family Team Meeting by Month

Month	CFTM Current		CFTM Overdue		Pending Initial CFTM		Case Closed in Month		Cases Overall
	#	%	#	%	#	%	#	%	Total
February 2021	74	18.6	302	76.1	17	4.3	4	1.0	397
March 2021	77	18.9	306	75.2	19	4.7	5	1.2	407
April 2021	75	18.0	316	76.0	23	5.5	2	0.5	416
May 2021	79	19.0	315	75.7	16	3.8	6	1.4	416
June 2021	78	18.9	305	74.0	14	3.4	15	3.6	412
July 2021	85	21.1	304	75.6	11	2.7	2	0.5	402
August 2021	85	21.3	301	75.3	5	1.3	9	2.3	400

Action #3: Compliance reports shall be provided to CWS Administration, the child welfare expert, and the compliance monitor on a monthly basis.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made substantive progress on this corrective action. Compliance reports relating to timely completion of CFTs are available to CWS staff and administration in SafeMeasures. In addition, compliance data is being provided to CWS administration on a monthly basis as of July 2021 as part of QIP #21-01. CWS has provided evidence which has been independently verified by CCRP. CCRP will continue to monitor and verify that CWS continues to provide monthly compliance reports to CWS administration throughout the duration of the monitoring period. CCRP will continue to review and assess the QIP each month at the time of its release and independently verify the data in SafeMeasures.

Progress Updates

Compliance data can be accessed at any time by CWS staff and administration through SafeMeasures. CQI staff also developed QIP #21-02 to monitor and improve compliance towards timely Child and Family Team (CFT) meetings, as well as provide program staff updated data that will support continuous quality improvement. The QIP also outlines strategies to improve compliance, which are reviewed, revised, and implemented with staff on a monthly basis. The analyst includes the aforementioned SafeMeasures report to update CFT compliance data on a monthly basis.

Action #4: In consultation with the child welfare expert, CWS shall establish a goal for the proportion of timely CFT meetings. If CWS falls below the established goal for two consecutive months, CWS shall immediately initiate a quality improvement plan to increase compliance to the established goal.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has established the annual goal for the proportion of timely CFT meeting in consultation with Evident Change. The annual goal for 2021 is that 22% of open cases will have a timely CFT meeting. Progress toward that goal will be assessed during the second monitoring period.

CWS established a specific, measurable, achievable, reasonable, and time-bound goal (SMART). Statewide performance was also reviewed to ensure the county is near the performance of counties across California. CCRP reviewed the goal, baseline data, and statewide performance and agrees that this is a reasonable annual goal for 2021.

CWS proactively developed a quality improvement plan related to this action. If they fall below the established goal for two consecutive months, CWS will immediately enhance that plan to increase compliance to the established goal.

Progress Updates

Based on staff and administration review of QIP #21-02, CWS established a goal of 22% for the proportion of timely CFT meetings. In August 2021, the proportion of timely CFT meetings for the county was 21%. The current proportion of timely CFTs for the State of California as a whole is 23%.

QIP #21-02 was developed in July 2021. CWS shared the QIP with Evident Change and consulted with them regarding the goal. Evident Change supported the plan to use the ongoing SafeMeasures CFT meeting measure to set goals and track progress over time rather than using the initial CFT measure, as it has generally very low numbers which makes completion rates sensitive to small fluctuations. CCRP also supports the plan to use the ongoing CFT meeting measure to set goals and track progress over time. Evident Change and CCRP both have direct access to SafeMeasures and are able to observe monthly trends in CFT meeting completion.

Action #5: In consultation with the child welfare expert, CWS shall select or develop a stakeholder survey to solicit feedback from CFT participants regarding the family meeting model. The survey results and underlying supporting data shall be provided to the child welfare expert and the compliance monitor for verification. The survey results shall be provided to CWS Administration to inform practice changes and CQI strategic planning, as needed.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Action #5. The survey tool has been selected in consultation with Evident Change. However, the survey has not been administered yet.

Progress Updates

In consultation with Evident Change, CWS has selected the CFT stakeholder survey that was piloted by the California Department of Social Services. The survey will be administered and analyzed during the subsequent monitoring period.

Area 3. Tribal Collaboration

Paragraph 3.N of the Stipulated Final Judgment:

CWS shall revise its policies and procedures to ensure collaboration with and input relating to decision-making from tribes. (1) Upon receipt of a referral that involves a child who is a member of or eligible for membership in a tribe, the social worker shall send the referral to the appropriate tribe within 24 hours in order to seek input from the tribe, unless an immediate or 24-hour response is needed, in which case the screener shall contact the tribe immediately or as soon as practically possible. (1a) The screener shall document details of that contact in the screener narrative, including whether contact was made, input was sought, and the input from the tribe, if any, including the dates and times of such contact. (2) For the referrals that are assigned for investigation, CWS shall provide tribal representatives sufficient notice to allow such representatives to accompany CWS social workers to investigations to ensure that such representatives are included in decision-making related to those referrals.

CSSP opined that efforts were needed to ensure expected and consistent adherence to this requirement.

Background

Humboldt County CWS Policy & Procedure: CWS 18-11 Tribal Collaboration (Effective Date 11/9/2018) outlines policies, procedures and expectations related to Tribal collaboration. The P&P follows from the Indian Child Welfare Act (25 U.S.C Sec 1901 et seq.) the California Welfare and Institutions Code, Division 31 regulations, and any applicable government to government protocols.

Issue 5. Development of Fidelity Tool

Corrective Actions

Action #1: CWS shall, in consultation with the child welfare expert, develop a fidelity tool that measures: a) whether referrals involving a child who is a member of or eligible for membership in a tribe were sent to the appropriate tribe within 24 hours in order to seek input from the tribe, unless an immediate or 24-hour response is needed, in which case the screener shall contact the tribe immediately or as soon as practicably possible, b) whether the screener documented their contact with the tribe including the details of that contact in the screener narrative, including whether contact was made, input was sought, and the input from the Tribe, if any, including the dates and times of such contact for referrals involving a child who is a member of or eligible for membership in a tribe and c) whether CWS provided Tribal representatives with sufficient notice and opportunity to accompany CWS social workers during investigations and to be included in decision-making related to those referrals.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has completed Action #1. Both a Tribal intake and Tribal investigation fidelity tool have been designed by CWS in consultation with Evident Change based on policy and procedures

developed collaboratively with the local Tribes during the previous Judgment. There are no existing fidelity or case reading tools to measure and assess Tribal collaboration to guide CWS, Evident Change or CCRP in this process.

An independent verification of the fidelity tools was not possible during the first monitoring period given that a case-specific review would be necessary to determine if existing records contain adequate information to answer the questions in the fidelity tool, and case reviews are scheduled to be completed during the second monitoring period. However, CCRP did review and match the fidelity tools to relevant CWS policies and procedures and can verify that the two fidelity tools do align with existing department policy and procedures.

Progress Update

As has been referenced previously, CWS CQI staff developed the following fidelity tools to assess compliance with policy and procedures related to tribal collaboration:

- Intake- Supervisor Tribal Collaboration Checklist
 - This tool assesses whether notification to Tribes at intake occurred. The tool was tested in January -February of 2021.
- Investigation- Supervisor Tribal Collaboration Checklist
 - This tool assesses whether CWS provided Tribal representatives with sufficient notice and opportunity to accompany CWS social workers during investigations and were included in decision-make related to those referrals.
- CWS Intake/Investigation Review Guide- developed and piloted by CWS. This document is referenced here but it is not a specific requirement outlined in the Stipulated Supplemental Judgment and, as such, was not reviewed or assessed by CCRP.

These tools are designed to collect data that documents how often critical steps of the Tribal collaboration process are happening at the screening and investigation level with referrals involving a child with Tribal affiliation. The tools are based on CWS policy and procedures that were co-created by CWS and the local Tribes and Rancherias. These tools were drafted by CWS and reviewed by Evident Change; written and verbal feedback was provided to CWS in April 2021.

Evident Change recommended the following action items as part of their consultation with CWS:

- The development of clear definitions for the items on each tool. The purpose of this action item is to ensure the case reviewers have clear criteria to guide the case review process.
- Incorporation of tribal stakeholder feedback on each tool. Evident Change suggested the following as options: adding questions to the tools that capture feedback from the Tribal social worker about their experiences collaborating with CWS, including the Tribes in the process of developing or reviewing the definition for the tool items, and/or inviting Tribal stakeholders to participate in the case review process.

To address the action items recommended by Evident Change, CWS did the following:

The CQI Program Manager conducted one-on-one interviews with Tribal Social Services Directors to obtain qualitative data on the tribal collaboration process at intake and investigation. Results from these interviews will be shared in the subsequent monitor report.

ICWA and Emergency Response analysts also interviewed CWS staff including social workers, supervisors and a Program Manager on the Tribal collaboration process at intake and investigation. Results from these interviews are not yet available but will be included in the next monitoring period.

An initial round of data collection to test the efficacy of the intake checklist was completed on February 18, 2021. Between January 1, 2021 and February 18, 2021, a total of 72 Intake Checklists were completed by CWS staff. The purpose of these activities was to test the intake checklist tool and to review preliminary data to have an initial assessment of the department’s progress on Tribal collaboration. Results are shared below but please note that this is not information specifically required in the Stipulated Supplemental Judgment; it is provided as context to the longer-term process that was underway before the monitoring period discussed in this report. In addition, while this review process is similar to Issue 6- Case Review discussed below, the case reviews that meet the criteria outlined in the Stipulated Supplemental Judgment are not completed and progress is discussed in the Issue 6 section of the report below.

Results from the January/February 2021 review listed above were provided to CWS Administration and the Tribes in March 2021.

The chart below presents the percentage of “Yes” responses for each item in the checklist. The preliminary benchmark set by CWS for all items is 95%. This data was presented in two reports that were shared with Tribal representatives: The Tribal Collaboration Checklist Tool Dashboard (3/5/2021) and the CWS Report Card (8/11/2021).

Figure 6. Tribal Collaboration: Results from Initial Review of Intake Fidelity Tool	
Tribal Collaboration Supervisor Intake Checklist Item	% of “Yes” responses
Ask the reporting party whether there is a reason to know that the child is, or may be (1) a member, or (2) the biological child of a member and eligible for members, in a federally recognized tribe.	96%
Provided information from the referral to the Tribal Social Worker	70%
Include Tribal input in screener narrative with date/time of contact and information provided	72%
Completed the SDM hotline tool together with the Tribe	48%
Referral response determined jointly with Tribe at intake	47%
Submitted cross report to Tribe including copies of all report and records pertaining to the child	49%
Agreement with Tribe of next steps at intake	67%
CWS/CMS searched for all possible Native American connection completed and documented	89%

Because this is preliminary data collected prior to the monitoring period discussed in this report, CCRP will not conduct independent verification of this information. Review of summary data provided by CWS from the first review of the intake checklist suggests that CWS's performance to determine Tribal affiliation and notify Tribes at intake is higher than measures related to joint efforts with the Tribes to complete tools, share reports (cross-reporting), and reach agreements.

In response to this data, CWS implemented the following strategies between February and August 2021:

- CWS initiated the custom design and build of an electronic cross-reporting application that CWS staff will use to send documentation to Tribes from a centralized hub. The hub will allow CWS to track cross-reporting using a systemic and standardized process to measure compliance to timeliness and completeness. This will also allow for ongoing quality assurance similar to what is done with cross-reporting to law enforcement. CWS is working with the DHHS Information Systems (IS) staff and it is almost ready for deployment.

This is an ongoing effort that is actively being worked on as of 8/14/2021. CCRP can verify this strategy is occurring based on observation of the draft application and review of documentation describing the application and its uses. CCRP can also verify that CWS is seeking Tribal input on this effort by observation of meetings where it has been discussed. These meetings occurred after 10/31/2021 but are referenced here for verification purposes and will be further discussed in the next report.

- CWS identified dedicated staff at intake to cover the Tribal collaboration tasks immediately after a report is taken. Staff contact the Tribe to inquire about eligibility, provide the information from the report to the Tribal social worker, gather additional information from the Tribe, go through the SDM hotline tool together, document collaboration information, complete the response priority together with the Tribe, and send the documentation. CWS did hear from some Tribal representatives that they had concerns with the person they talk to not being the person who took the report. This was a pilot strategy. CWS did encounter staffing issues when one of the Tribal specialist screeners went on leave. There were benefits to this approach and CWS plans to explore re-implementing this when staffing allows and more consultation has been done with the Tribes.

Due to staffing issues this strategy has been temporarily suspended as of 8/14/2021. Because the strategy is not actively being pursued CCRP did not conduct data verification; if efforts are restarted then data will be verified. CWS will determine whether or not it is feasible to restart this effort. CCRP recommends that CWS continue to work on strategies to improve data tracking that identifies points of collaboration with Tribal partners. Based on information gathered from multiple stakeholders and review of the SafeMeasures reporting capability, CCRP observed that there are very limited standard reporting options available to CWS to track various aspects of Tribal

collaboration. Any verification requiring data that is not tracked in SafeMeasures will require extensive case-by-case review by the monitor.

- CWS ICWA supervisors review and process all ICWA referrals. This strategy is also in the pilot stage as of 8/14/2021. CCRP utilized data from CWS/CMS to confirm that supervisors are approving referrals. CCRP will provide an update on CWS's adoption of this strategy and their assessment about whether or not this strategy improves compliance in the subsequent monitor's report.
- ICWA staff (usually the Program Manager) conduct quality assurance reviews on reports taken during after-hours shifts that involve Tribal children to ensure tribal collaboration occurred. They directly follow-up if a step was missed. There is no data available to verify that this is happening other than information provided by CWS staff. CCRP will provide an update on CWS's adoption of this strategy and their assessment about whether or not this strategy improves compliance in the subsequent monitor's report.

Issue 6. Case Reviews

Corrective Actions

Action #2: In consultation with the child welfare expert, a review shall be conducted of a sample of investigations involving Native American children, using the above referenced fidelity tool with the scope, timing, and sample size of the review to be determined in consultation with the child welfare expert. Case review results and underlying supporting data shall be provided to the child welfare expert and compliance monitor for verification. Aggregate results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform practice changes and CQI strategic planning, as needed.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Action #2, though the actual case reviews are not complete. The scope, timing and sample size of the reviews was actively being worked on collaboratively by CWS and Evident Change as of 8/14/2021; details were not finalized by the end of the first monitoring period. The primary work done in the first monitoring period was focused on planning for and designing the case review process and guidelines.

In addition, to achieve full compliance by the end of the second monitoring period, case review results and underlying supporting data must be provided to CCRP and Evident Change. CCRP will review and verify results in consult with Evident Change. Copies of the aggregated results from the case reviews must be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning as outlined in the Stipulated Supplemental Judgment.

Progress Updates

The case reviews will be completed during the next monitoring period. The scope, timing, and sample size of the reviews are being developed in consultation with the child welfare expert as of 8/14/2021. The draft summary document was provided to CCRP, and CCRP has reviewed

several iterations of the plan. However, details are not yet finalized so definitive numbers and information are not available. CCRP will include the final details on the scope, timing, and sample size in the subsequent monitoring report.

Evident Change confirmed that they reviewed the plan for the case reviews and provided written feedback to CWS in September 2021. Evident Change also indicated that CWS made updates to the plan in response to the feedback provided.

CCRP reviewed both fidelity tools to ensure that the items specifically listed in the Judgment are appropriately addressed. CCRP found the following:

- Action #1a asks whether referrals involving a child who is a member of or eligible for membership in a tribe were sent to the appropriate tribe within 24 hours in order to seek input from the tribe, unless an immediate or 24-hour response is needed, in which case the screener shall contact the tribe immediately or as soon as practicably possible.
 - CCRP notes that #5 on the intake fidelity tool requires the reviewer to answer this question. CCRP notes that Q5 asks two questions- 1) was the referral involving a child who is a member of or eligible for membership? and 2) was the referral sent to the appropriate Tribe within 24 hours in order to seek input from the Tribe, unless an immediate or 24-hour response is needed, in which case the screener shall contact the Tribe immediately or as soon as practically possible? CCRP recommends #5 be simplified to only ask question 2.
- Action #1b asks whether the screener documented their contact with the tribe including the details of that contact in the screener narrative, including whether contact was made, input was sought, and documentation of the input from the Tribe, if any, including the dates and times of such contact for referrals involving a child who is a member of or eligible for membership in a tribe.
 - Whether contact was made: CCRP notes that #2 on the intake fidelity tool requires the reviewer to determine whether the screener followed the Tribal contact sheet and cross-reporting procedure and any applicable Tribal protocols to notice any Humboldt County Tribe(s) identified by the reporting party. CCRP also notes that #4 requires the reviewed to assess whether or not the screener provided information from the referral to the Tribal SW. It is not clear which or whether both of these will be used to determine whether contact was made.
 - Whether input was sought: CCRP notes that #6, 7, 8, 9, and 10 address whether input was sought. CCRP suggests that it be clarified which or if all of these items will be used to make the determination of whether Tribal input was sought.
- Action #1c asks whether CWS provided Tribal representatives with sufficient notice and opportunity to accompany CWS social workers during investigations and to be included in decision-making related to those referrals.
 - Question #4 on the investigation fidelity tool asks- Did the investigating social worker request a joint client contact with the Tribe? And Question #5 asks- Did the investigating social worker interview the child/ren jointly with Tribe? CCRP could not find reference to CWS providing Tribal representatives with sufficient

notice, or what is defined as “sufficient” to make this determination. CCRP & Evident Change suggest that CWS clarify how they will determine whether or not Action #1c is met.

CCRP agrees with the determination reached by CWS in consultation with Evident Change that comparative case reviews should be conducted by both entities, since the Tribal fidelity tools were developed specifically for the case reviews required by the Stipulated Supplemental Judgment and will benefit from a comparative review to ensure reliability.

In response to a request from Tribal partners, and after follow-up discussions with CWS, it was agreed that CCRP will be invited to observe case review sessions. These observations will take place during the second monitoring period. In addition, case review results and underlying supporting data shall be provided to the child welfare expert and the monitor for verification. CCRP will discuss expectations for case review results and underlying supporting data with the child welfare expert upon conclusion of the case reviews, and will develop guidance to assist CWS as they put together the summary information and data for verification. Evident Change indicated that they have already provided CWS with ideas for a verification plan and commitments for sharing aggregated results.

Issue 7. Tracking/Reporting Contacts with Tribal Representatives

Background

The Indian Child Welfare Act (ICWA), Humboldt County Child Welfare Services Policy and Procedures 18-11 Tribal Collaboration and 18-12 Initial Assessment and Investigation state that investigating social workers shall contact the Tribe when an investigation involves a child who is a member of or eligible for membership in a federally recognized tribe to coordinate contacts with the child and family. CWS uses the California statewide automated child welfare information system, CWS/CMS to document all contacts made.

Corrective Actions

Action #3: CWS shall continue to use the California statewide automated child welfare information system, CWS/CMS to document all contacts made with the family and participants present during contacts.

Action #4: CWS shall track and report the proportion and type of contacts that include tribal representatives during investigations that involve a child who is a member of or eligible for membership in a federally recognized tribe.

Action #5: Reports shall be provided to CWS Administration and the compliance monitor on a monthly basis to inform strategic CQI planning.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has made progress on Actions #3,4 & 5. Limited administrative data is tracked in CWS/CMS, so there are no standard reports available in SafeMeasures. CWS uses a business intelligence tool to create a custom report with this information. Due to time constraints, CCRP

was not able to independently verify the data for the first monitoring period. However, CWS staff did do a demonstration of the process they use for this action for CCRP.

CCRP recommends that CWS implement a QIP for this action, similar to the process being used for MHSTs and CFTs to document efforts and facilitate discussions with CWS staff and administration to better understand gaps that may be occurring in data entry and identify strategies to improve compliance.

Progress Update

CWS staff continue to document all contacts made with the family including participants present during contacts in CWS/CMS. CWS has provided the following document as evidence:

- Desk Guide- Contact Documentation: The guide states that “contact documentation in CWS/CMS is a critical part of creating a written record of Child Welfare Services’ work with a family, ensuring compliance with Division 31 and other State and Federal requirements, and documenting reasonable services or active efforts.” Practice Tips & Notes on p1 state that “particularly on ICWA cases, it is vital to document any and all communication with the Tribe.”

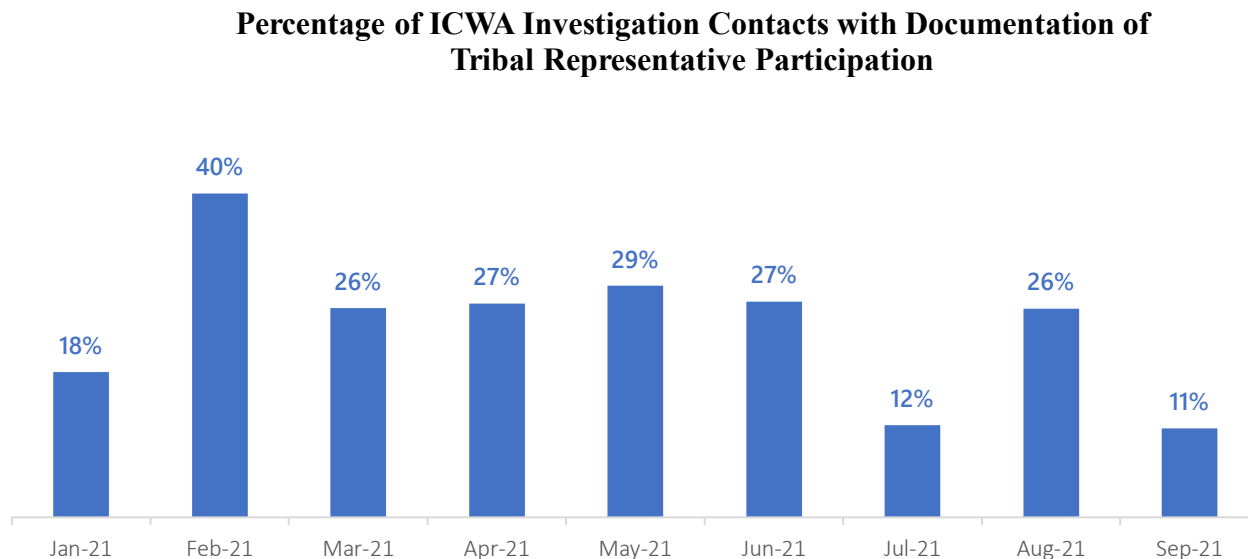
This document is thoroughly reviewed during the onboarding period for all new Social Workers, typically within the first two weeks. The training supervisor provides this to staff, trains staff to the process and routinely reviews this during the full onboarding period. In addition, monthly program-level staff meetings are also utilized to review desk guides and other relevant policies and procedures with staff on an ongoing basis. Program managers and supervisors also regularly send out desk guides to staff via email to make sure that desk guides are available and accessible for staff to utilize. CCRP reviewed the desk guide, relevant policies and procedures and verified the process described above with multiple staff, however, verification that this process occurs across the board at all of the times described above would require significantly more time for observation of onboarding sessions, regular staff meetings, and review of meeting agendas, emails, and other correspondence with staff; this was not possible given the time allowed to the monitor to complete the report.

Specific to the language in the Judgment, CCRP deems that CWS has the infrastructure and training mechanisms in place to ensure that staff have access to multiple resources available to support the practice of entering Tribal contact information to CWS/CMS. CCRP recommends that CWS continue to make these resources readily available and accessible to all new and experienced staff, and that supervisors and managers continue feedback loops with staff to assure compliance with this requirement.

CWS CQI staff have developed a dashboard to track data on a monthly basis. The purpose of the dashboard is to track and report the proportion and type of contacts that include Tribal representative during investigations that involve a child who is a member of or eligible for membership in a federally recognized Tribe to better understand and measure Tribal collaboration.

Figure 7 reflects the proportion of all joint contacts with a representative from the Tribe as documented in CWS/CMS. The chart is directly pulled from the CWS CQI data dashboard referenced above.

Figure 7. Percentage of Joint Contacts with a Tribal Representative



Data Source: CWS/CMS, January 2021-September 2021

CWS has developed strategies to increase the percentage of ICWA investigation contacts with documentation of Tribal representative participation that will be implemented and assessed during the subsequent monitoring period. In discussions with staff, it has been identified that there is potentially some data entry lag happening with open cases and referrals, with the lag possibly occurring between the actual contact and the entry of the contact into CWS/CMS. In response the ICWA Program Manager is working with staff to ensure timely entry of data in CWS/CMS. This was identified as a potential issue for staff to further investigate, it is mentioned here to demonstrate how staff engage with and discuss the data shared in the dashboards that CWS CQI distributes to facilitate continuous quality improvement. CCRP notes that this is not a verified issue and it will require further investigation to determine whether or not it poses a compliance issue for Action #3; this work will be done in the subsequent monitoring period.

Additional Areas Specified in the Stipulated Supplemental Judgment

Adequate Staffing

Defendants shall continue to make good-faith effort to continue maintaining staffing levels necessary to operate Child Welfare Services (“CWS”) according to applicable statutory and regulatory framework.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has provided documentation and information to CCRP that demonstrates good-faith efforts to maintain adequate staffing levels. CCRP notes, and CWS acknowledges that staffing

challenges exist and are being addressed using a variety of strategies outlined below. CWS has also sought outside technical assistance to support efforts to maintain adequate staffing. Some staffing issues, such as those caused by the pandemic, are being experienced at a broader level in the county, state and nation and are not unique to Humboldt County or to CWS. CCRP will continue to assess and monitor efforts to maintain adequate staffing in the subsequent monitoring period.

Progress Update

CWS does a weekly workload point-in-time report to provide real-time data on staffing and caseloads for all programs. The report is updated weekly and distributed every Friday. The report serves as a reference guide for point-in-time referral and caseload data. It may not account for caseloads being temporarily covered by other staff due to temporary leaves or report assignment changes, including recent case promotions that have not been updated yet in CWS/CMS with the primary assignment.

There are 205 positions allocated to CWS. As of October 15, 2021, 156 positions were filled and there were 49 vacancies. The bulk of the vacancies were in the social worker positions (28), followed by social services aides (12), though it should be noted that these classifications also have the most positions allocated (social worker=103 positions and social services aide=29 positions).

Some other department-wide strategies employed by CWS to maintain adequate staffing include hiring and training staff in cohorts, designating staffing/workforce as one of the six programs within the department, and working with outside experts and local educational institutions to assist with recruitment and retention. Staff within CWS designed and the department currently administer a peer-provided exit survey to understand the reasons that staff leave. Results from these anonymous and peer-provided surveys are aggregated and presented in a dashboard that is shared across CWS.

From February through April of 2021, CWS was involved in several enrichment activities to prepare for further workforce development. These included meetings and workshops with personnel from UC Davis, Humboldt State University, the California Tribal Families Coalition, and Evident Change's Working With and Across Differences (WWAD) diversity, equity and inclusion work area. Topics included creating student opportunities, cross-cultural competency, ICWA training, and more.

In July, the CWS Workforce Program Manager reached out to consultants with the Kyer Group to initiate discussions on CWS's specific workforce retention needs and what services the Group might have that speak to these needs. The Kyer Group was ultimately contracted to provide mindfulness and resilience training to staff. Consultants will provide case debriefing sessions, assess stressors contributing to anxiety, vicarious trauma, compassion fatigue and other issues facing Social Workers, and coach staff on strategies to help manage these factors.

During the first monitoring period, CWS's collaboration with UC Davis focused on completion of the Workforce Needs Assessment. The final draft of the Needs Assessment was circulated

May 11, 2021, and was also presented to the Community Task Force. This report forms the basis of a subsequent contract to create and launch a Workforce Development Program which was formulated and signed by CWS and UC Davis on August 8th. By August 26th, a draft Workplan was completed and circulated for review, which is the last activity pertaining to this aspect of the judgement that took place within the reporting period.

The Needs Assessment was comprehensive; it included focus groups, input from external stakeholders on CWS performance, and two rounds of surveys with significant response numbers. CCRP considers the insights produced and recommendations included in that report to be well-founded and actionable. In its current form the draft plan requires more actions in order to address the substantial recommendations put forth in the Needs Assessment, so CCRP's analysis of good faith efforts will assess progress against that gap in the subsequent monitoring period.

With the Needs Assessment and initial steps towards a Workforce Development Plan, CWS has set a vision, objectives, and identified concrete activities and responsible personnel to initiate staff coaching and continuing education opportunities. Prospectively, the Workforce Development unit is working on identifying experiential learning activities that all new hires should have within three months of starting work to be set up for success in their role. These experiences cover areas including (but not limited to) interviewing parents, completing safety assessments, writing court reports, warm handoffs connecting families to service providers, and other facets of ICWA and ER caseloads. The team also anticipates working on mainstreaming coaching and professional development elements into the regular operation of the department.

During this period, recruitments were finalized or initiated for nine new hires, filling both social work and administrative positions. The department held an internal meeting in preparation for receiving HSU interns in Fall 2021. CWS also initiated a round of internal promotions in February, resulting in eight Social Worker III positions being offered.

Hiring continued in May and June, with five new recruitments announced. Among these, the department sought a Social Worker IV with a specialization in ICWA. In mid-May four Social Workers completed their MSWs with agency support, and six new hires began their three-month onboarding process. In June the department made eight offers resulting in six hires. Of these, five internal promotions were accepted and one external candidate brought on board. Two external candidates declined offers. With respect to retention efforts, a cohort of program managers from CWS attended a UC Davis hosted workshop on coaching techniques. In August the department announced an ICWA recruitment which opened in May, however, the department was not able to find a viable candidate through this recruitment. Later that month, a new cohort of interns started work with CWS through HSU's social work department collaboration. This cohort included four current CWS employees and three external interns.

Interviews with CWS staff revealed the following challenges that the department is currently facing in its recruitment and retention efforts:

- Small applicant pools, specifically for higher-level social worker positions.
- Difficulty hiring external candidates

- Staff leaving due to COVID concerns: general stress related to pandemic, health complications, young children, stress related to front-line work during COVID
- Competitive job market: lots of open positions, people seeking jobs have more options and choices right now

Results from exit interviews with outgoing staff, reported in its respective dashboard in May of 2021, corroborates these views. The two most frequently cited reasons for leaving were better career opportunities being offered elsewhere and to seek improved work life balance.

Work related to adequate staffing will continue and progress will be updated during the subsequent monitoring report.

Child Protection Reporting Guide

Defendants shall continue working with Evident Change, the Humboldt County Sheriff's Office, and community stakeholders to complete the final public electronic application for the Child Protection Reporting Guide (CPRG), as outlined in Paragraph 3. CC(7) and Paragraph 3 KK(1) of the stipulated final judgment. Defendants further agree to continue to participate in modifying and/or refining the Child Protection Reporting Guide on an ongoing basis.

Background

According to Evident Change, the CPRG is intended to assist reporters who are concerned about possible abuse or neglect of a child and who must decide whether to report their concerns to a child protection agency (CPA), which includes CWS, Humboldt County Sheriff's Office, or any other law enforcement agency. When a report is recommended, this CRPG directs users to CWS.

Monitor Assessment (2/14/2021-8/14/2021)

CWS has continued to work with Evident Change and community stakeholders to complete the Child Protection Reporting Guide (CPRG); specific progress in outlined below. CCRP will continue to monitor progress on this item during the second monitoring period.

Progress Updates

In February of 2021, Evident Change and CWS met to revise the draft CPRG that will be used for the online platform and trainings. The Community Task Force was briefed on the status of this work, and Evident Change delivered the first mockup of the permanent website to CWS for feedback on the 25th. Adjustments were made under the consult contact list to maintain CWS as primary point of contact until the team can better assess the frequency and nature of these calls. CWS communicated with the Humboldt County Child Abuse Prevention Coordinating Council (CAPCC) and the Humboldt County Office of Education (HCOE) about including links on their site to the CPRG and training materials, as appropriate. In late March and April, colleagues from CWS circulated the e-learning platform to staff for feedback.

Beta testing of the web-based platform began in May 2021. The team began User Acceptance Testing (UAT) internally, and circulated calls amongst CWS and DHHS staff to solicit their participation in testing the site. This culminated in CWS delivering feedback to Evident Change on the site's usability in late May, and initial changes to the platform were made. Outreach for community participation in UAT was made to Family Resource Center coordinators, law enforcement, justice, health and human service agencies, and to Tribal personnel throughout June 2021, resulting in additional stakeholder feedback on the CRPG tool and application. The team provided Evident Change with a draft data dashboard, designed to measure the impact of the CPRG on reporting trends. At this time Evident Change's contract was extended through June of 2022. The renewed contract covers implementation activities related to the CPRG-training, remote support, evaluation and facilitation of workgroups.

July and August 2021 were devoted to collecting more feedback on the usability of the web tools and trainings, and the design of the CPRG generally, including communications requesting feedback from the Trinidad and Bear River Rancherias. Initial comments from Wiyot representatives were positive, and the Yurok Tribe provided feedback (forwarded to Evident Change) outlining concerns for redress. Consequently, some Tribes were removed from the acknowledgement page on the site, per their request. CWS prepared Evident Change to attend one of the weekly ICWA planning meeting to discuss the CPRG, and the Community Task Force meeting where Evident Change demonstrated use of the site.

As concerns on the best way to broadly launch the CPRG responsibly have not been resolved, it is not yet possible to track, using the dashboard, the impact it will have on reporting. Evident Change and CWS must reach agreement on which organization will serve as lead on several key activities to finalize the launch of the Guide. As progress moves forward beyond August 2021, CCRP will provide analysis on the few new metrics added to the reporting dashboard which can capture the impact of the CPRG on trends and their efficacy in doing so.

Work on the CPRG will continue and an update on progress will be provided in the subsequent monitoring report.

VI. Summary of Tribal & Stakeholder Feedback

CCRP solicited and received input from a variety of Tribal and community stakeholders and will continue to seek input during and after the second monitoring period. All feedback has been recorded and will be summarized and shared with CWS staff. Some feedback that was received requires additional investigation and inquiry necessary for an independent assessment. Feedback did vary in nature as to the level of specificity; CCRP will follow-up as necessary to fully understand and report on feedback that relates specifically to items listed in the Stipulated Supplement Judgment.

Specifically, feedback from Tribal stakeholders included several requests for CCRP to independently review additional data and documentation related to items in the Judgment. Tribal representatives requested that CCRP conduct in-depth case reviews of specific cases involving Tribal children to independently assess the level of collaboration that is occurring. There was

also a request for CCRP to review screener narratives involving Tribal children. In addition, Tribes requested that CCRP review complaints to the ombuds office that were made by Tribes. These requests were shared with CWS and CWS has agreed to these requests. The review of this data and documentation will occur in the subsequent reporting period. While Tribal collaboration can be broadly defined, CCRP will focus on assessing compliance to specific items referenced in the Stipulated Supplemental Judgment.

CCRP will continue to make active efforts to engage Tribal representatives and community stakeholders in the subsequent monitoring period.

Appendix A. Overall Assessment- Attorney General Stipulated Supplemental Judgment

Monitoring Report #1: February 14, 2021-August 14, 2021

Area 1. Interagency Protocol			
Issue 1: Mental Health Referral & Screening			
Item	Corrective Action	Status	Recommendation
1	CWS shall use the California statewide automated child welfare information system, CWS/CMS, to document all mental health screenings and referrals made to County Mental Health for children in an open CWS case.	Complete	Continue efforts to ensure data integrity
2	CWS shall track and report mental health screening and referral data from CWS/CMS, including the number and proportion of children in an open CWS case who have had a timely screening and referral to mental health services.	Complete	Continue efforts to run daily and monthly reports using SafeMeasures
3	Compliance reports relating to CWS' screenings and referrals to County Mental Health shall be provided to CWS Administration on a monthly basis.	Complete	Continue to update and share QIP on a monthly basis with Admin & staff
4	CWS shall establish an annual goal for the proportion of timely screening and referrals made to mental health.	Complete	Continue to update and share QIP
5	If CWS falls below the established goal for two consecutive months, CWS shall initiate a quality improvement plan to increase compliance to the established goal.	In process	Continue to implement QIP strategies and monitor progress
Area 2. Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendants			
Issue 2: New Investigative Decisions			
Item	Corrective Action	Status	Recommendation
1	A CWS supervisor shall continue to review and approve all reports received, including those involving children in out-of-home care. All reports shall continue to require electronic supervisor approval of the determined response in CWS/CMS.	Complete	Continue efforts to ensure data integrity

2	In consultation with the child welfare expert, the California SDM Intake Supervisory Referral Reading fidelity tool shall be used to review a sample of reports received that involved children in an open case or referral to determine whether an appropriate response decision was made per policy. The scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert. Reviews involving reports that include Native American children will be conducted by CWS' Indian Child Welfare Act (ICWA) Program. Reviews involving all other reports will be conducted by CWS' Continuous Quality Improvement (CQI) Program. Case review results and underlying supporting data shall be provided to the child welfare expert and the compliance monitor for verification. Aggregated results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning.	In process	Continue to work with Evident Change to complete case reviews Provide case review results and underlying supporting data when complete Monitor to review and verify in consult with Evident Change Copy of reports provided to CWS Administration and Tribes
Area 2. Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendants Issue 3: Thorough Risk Evaluation			
Item	Corrective Action	Status	Recommendation
1	CWS shall, in consultation with the child welfare expert, develop an intake and investigation fidelity tool that measures CWS' adherence to its policy that tribes are to be routinely contacted, as required, to contribute to evaluations during intake and investigations.	Complete	Continue to use and refine fidelity tools to measure adherence to policy
2	In consultation with the child welfare expert, a review shall be conducted of a sample of reports received involving Native American children utilizing the above referenced fidelity tool. The scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert.	In process	Continue to work with Evident Change to complete case reviews Provide copy of report outlining results from case reviews when complete
3	In consultation with the child welfare expert, CWS shall continue to use the California SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading tool to review reports investigated to determine whether an appropriate risk assessment was made per policy. The	In process	Continue to work with Evident Change to complete case reviews

	scope, timing, and sample size of the reviews shall be determined in consultation with the child welfare expert.		
4	The results of the reviews conduct and underlying supporting data shall be provided to the child welfare expert and the compliance monitor Aggregated results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform CQI strategic planning	Incomplete	Monitor to review and verify in consult with child welfare expert Copy of reports provided to CWS Administration and Tribes
Area 2. Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendants Issue 4: Child & Family Team Meetings			
Item	Corrective Action	Status	Request for Documentation
1	CWS shall continue to use the California statewide automated child welfare information system, CWS/CMS to document all CFT meetings held	Complete	Continue efforts to ensure data integrity
2	CWS shall track and report CFT meeting data from CWS/CMS, including the number and proportion of children in an open CWS case who have had a timely CFT meeting	Complete	Continue efforts to run monthly reports using SafeMeasures
3	Compliance reports shall be provided to CWS Administration, the child welfare expert, and the compliance monitor on a monthly basis.	Complete	Continue to update and share QIP #21-02 on a monthly basis with Admin & staff
4	In consultation with the child welfare expert, CWS shall establish a goal for the proportion of timely CFT meetings. If CWS falls below the established goal for two consecutive months, CWS shall immediately initiate a quality improvement plan to increase compliance to the established goal.	In process	Continue to update and share QIP #21-02 on a monthly basis with Admin & staff

5	In consultation with the child welfare expert, CWS shall select or develop a stakeholder survey to solicit feedback from CFT participants regarding the family meeting model. The survey results and underlying supporting data shall be provided to the child welfare expert and the compliance monitor for verification. The survey results shall be provided to CWS Administration to inform practice changes and CQI strategic planning, as needed.	In process	When complete, provide copy of survey results and underlying supporting data for review and verification by monitor
Area 3. Tribal Collaboration			
Issue 5: Development of Fidelity Tool			
Item	Corrective Action	Status	Recommendation
1	CWS shall, in consultation with the child welfare expert, develop a fidelity tool that measures: 1) whether referrals involving a child who is a member of or eligible for membership in a tribe were sent to the appropriate tribe within 24 hours in order to seek input from the tribe, unless an immediate or 24-hour response is needed, in which case the screener shall contact the tribe immediately or as soon as practicably possible, 2) whether the screener documented their contact with the tribe including the details of that contact in the screener narrative, including whether contact was made, input was sought, and the input from the tribe, if any, including the dates and times of such contact for referrals involving a child who is a member of or eligible for membership in a tribe and 3) whether CWS provided tribal representatives with sufficient notice and opportunity to accompany CWS social workers during investigations and to be included in decision-making related to those referrals.	Complete	Continue to monitor, summarize and share data with the Tribes through the CWS Report Card or other means.
Area 3. Tribal Collaboration			
Issue 6: Case Review			
Item	Corrective Action	Status	Recommendation

2	In consultation with the child welfare expert, a review shall be conducted of a sample of investigations involving Native American children, using the above referenced fidelity tool with the scope, timing, and sample size of the review to be determined in consultation with the child welfare expert. Case review results and underlying supporting data shall be provided to the child welfare expert and compliance monitor for verification. Aggregate results from the reviews shall be provided to CWS Administration and the Tribes, as appropriate, to inform practice changes and CQI strategic planning, as needed.	In process	Continue to work with Evident Change to complete case reviews Monitor to review and verify in consult with Evident Change Provide copy of results provided CWS Administration and Tribes
Area 3. Tribal Collaboration Issue 7: Tracking/Reporting Contacts with Tribal Representatives			
Item	Corrective Action	Status	Recommendation
3	CWS shall continue to use the California statewide automated child welfare information system, CWS/CMS to document all contacts made with the family and participants present during contacts.	Complete	Continue efforts to ensure data integrity
4	CWS shall track and report the proportion and type of contacts that include tribal representatives during investigations that involve a child who is a member of or eligible for membership in a federally recognized tribe	Complete	Continue to update Joint Investigation with Tribes dashboard on a monthly basis
5	Reports shall be provided to CWS Administration and the compliance monitor on a monthly basis to inform strategic CQI planning.	In process	Share JIC dashboard with Tribes Develop a QIP to identify strategies to increase the percentage of contacts with Tribal participation

Appendix B. Glossary of Acronyms

AG	Attorney General
CANRA	Child Abuse and Neglect Reporting Act
CAST	Child Abuse Services Team
CCFSR	California Child and Family Services Review
CCRP	California Center for Rural Policy
CDSS	California Department of Social Services
CFT	Child and Family Team
CMH	(Humboldt County Dept. of Health and Human Services) County Mental Health
CPRG	Child Protection Reporting Guide
CQI	Continuous Quality Improvement
CSSP	Center for the Study of Social Policy
CWS	(Humboldt County Dept. of Health and Human Services') Child Welfare Services
CWS/CMS	Child Welfare Services/(electronic) Case Management System
DA	District Attorney
DHHS	Department of Health and Human Services
HCSO	Humboldt County Sheriff's Office
ICWA	Indian Child Welfare Act
KPI	Key Performance Indicator
MOU	Memorandum of Understanding
NCCD	National Council on Crime and Delinquency/Evident Change, now Evident Change
SDM®	Structured Decision Making
SIP	Systems Improvement Plan
TA	Technical Assistance