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: August 15, 2021-February 14, 2022



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The California Center for Rural Policy at Cal Poly Humboldt is a research and evaluation center committed to informing policy, building community, and promoting the health and well-being of people and environments.

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Executive Summary

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 August 15, 2021, to February 14, 2022 (referred to as the monitoring period). As required by the Judgment, DHHS contracted with a third-party compliance monitor. The California Center for Rural Policy (CCRP) at Cal Poly Humboldt serves as the third-party compliance monitor.

There were three areas deemed incomplete by the previous monitor which form the Stipulated Supplemental Judgment: interagency protocol, implementation of new emergency response system, and Tribal collaboration. The chief finding of this report is that CWS has completed all outstanding actions under all areas of the Stipulated Supplemental Judgment at the close of the monitoring period. Humboldt County CWS has used the opportunity of the Judgment to build infrastructure that deepens the department's responsiveness to issues arising in its caseload, strengthens collaboration with external stakeholders, and increases accountability to its mandate and the community. Not only have many tools and processes been customized to better fit the specific needs identified in the Judgment (SafeMeasures reports, CFTs surveys, processes for pulling data from CWS/CMS that speak to core concerns), but several entirely new tools have been developed for these purposes including cross reporting applications, Tribal Collaboration checklists and the Child Protection Reporting Guide (CPRG). These innovations are highlighted throughout the report.

Additionally, CWS has demonstrated commitment to continuing reform processes by further initiating case review processes outside of those required by state policy and the Judgment. CWS has engaged external expertise to help build analytical capacity of staff with on-going technical assistance and contracting capacity support to key program areas. Humboldt County CWS has also continued to monitor performance on key metrics pertaining to the Judgment, including the percent of open cases with a qualified CFT and MHST, beyond the monitoring period and despite having surpassed California state averages in these areas.

Feedback received from CWS staff, Tribal and community partners also identified areas where enacted reforms failed to deliver satisfactory outcomes. For example, performance on Tribal contacts is still not meeting the standard codified in the department's policy and procedure, or to Tribal collaborator's expectations. The department continues to develop tools and strategies to address this given the dearth of existing guidance, best practice, or practical solutions that exist in the community of practice to aid them. There remains room for improvement on documenting contacts and responding to concerns from Tribal representatives.

Looking to the future, conversations with CWS, community and Tribal partners, and child welfare expert Evident Change generated the following areas for further articulation by Humboldt County CWS:

- 1. Formalize processes for gathering community feedback, circulate it amongst relevant internal staff, and incorporate it into decision-making. Create a schedule and timeline for this process (across all issue areas where it occurs) that is driven by community needs and works within CWS's existing structures and capacity. Work towards mutual understanding of when and how input is gathered and trust that it will be acted upon whenever possible. Build capacity to integrate qualitative data into CQI.
- 2. Formalize processes for communicating performance to external partners and the community. Build on existing efforts and find a sustainable cadence for reporting which can forge a sense of transparency and accountability between CWS and the community at large.
- 3. As the CQI program matures, formalize protocols for transitioning out of Quality Improvement Plans into on-going monitoring.
- 4. Further articulate how case review practice will be conducted moving forward, and how capacity will be built around this competency. If possible, conduct joint reviews on ICWA cases with Tribal representatives.

Finally, it is evident that Humboldt County is not alone in its challenges regarding collaboration, staff capacity development, and other elements which are crucial to strong delivery of its mandate. There is a sense among the parties involved that there is learning and innovation to be gained through exchanges between California counties regarding practice in several issue areas of the Judgment, particularly Tribal collaboration. Given the resource constraints and immediacy of day-to-day service delivery, additional resources to support this work would likely benefit all California counties.

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 August 15, 2021, to February 14, 2022 (henceforth the "monitoring period" or "second monitoring period").

As required by the Judgment, DHHS contracted with a third-party compliance monitor. The California Center for Rural Policy (CCRP) at Cal Poly Humboldt serves as the third-party compliance monitor. This is CCRP's second 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 August 15, 2021, and February 14, 2022.

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 a tool 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 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 utilized 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.

The State of California mandates case reviews from the counties, the number of reviews set proportionally to the number of cases per county, completed according to the guidelines in *Child Welfare Services Case Review Policies and Procedures Manual*¹.

Case Reading Tools

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

- Structured Decision-Making (SDM) Intake Supervisory Referral Reading tool
 - o 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
 - o Developed by Evident Change for use by all California Counties
 - Used by CWS to determine whether an appropriate risk assessment was made per policy

¹ https://cdss.ca.gov/lettersnotices/entres/getinfo/acl/2015/15-77.pdf

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

Per policy and procedure, CWS staff are required to contact, communicate, and collaborate 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, 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. CCRP was provided access to all of these data sources and utilized them to assess compliance with the Stipulated Supplemental Judgment.

Report Structure

The report is focused on the period of August 15, 2021-February 14, 2022 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 current status of CWS's efforts to build a CQI program and its efficacy in improving and maintaining performance on key metrics.
- 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 and Community Partner Feedback
- VII. Conclusions & Future Efforts
- 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 Cal Poly Humboldt.

II. Monitor Activities

Throughout the monitoring period CCRP engaged in five primary strategies to document and verify continued adherence to standards laid out and reforms necessitated by the Stipulated Supplemental Judgment. First, CCRP participated in weekly meetings with the CWS Deputy Director in charge of CQI and at times other CWS staff which served as a qualitative data gathering exercise. These conversations focused on discussing developments and the perceived efficacy of the various strategies being enacted. Second, CCRP staff sat in and observed standing meetings related to Judgment areas on a weekly basis. Third, CCRP had standing access to key data platforms used in CWS's daily operations- CWS/CMS, SafeMeasures, and a Trello board among them- so data could be verified via data pulls and periodic reviews of information uploaded there. Fourth CCRP requested and reviewed a wide array of primary documents that were generated internally as new practices and programs were launched to fulfill the requirements of the judgment. Finally, CCRP held interviews and focus group sessions with community and rightsholder groups to understand their experience of the reforms being enacted at CWS.

CCRP received and reviewed monthly compliance reports ("dashboards") compiled and analyzed by CQI staff on the topic areas from the Judgment: Child and Family Team meetings (CFTs), timely Mental Health Screening and Referral (MHSTs), and joint investigation contacts with Tribes. CCRP also reviewed a variety of documents that provided snapshots of department performance on key measures in the preceding month, and strategies identified by CQI to address any negative trends or mainstream effective strategies.

CCRP submitted a data request to CWS on 3/2/2022 and was subsequently provided with documentation and data to satisfy the request. This included data pulled from SafeMeasures and CWS/CMS which CCRP observed live. The chief purpose of the request was to access additional primary source documentation especially for areas of the Judgment which are not captured in

current dashboards such as workforce staffing. CWS has continued to furnish dashboards and provide updates related to performance on the areas in the Judgment beyond the monitoring period. Some of these updates are included in the second monitoring report when useful for understanding how new practices are being integrated into daily operations beyond the timeline of the judgment.

CCRP also attended regularly scheduled meetings with CWS, other organizations in the child welfare community of practice, and Tribal representatives. Relevant actors were identified by CCRP through collaborative discussions with CWS, Evident Change, and the AG's Office, and by reviewing previous monitor reports. Representatives from the Tribal nations were also asked to refer relevant community members to provide feedback to the monitor. CCRP contacted all eight Tribes and Rancherias individually to seek input on CWS compliance with corrective actions listed in the Judgment. CCRP conducted three one-on-one meetings with two Tribes and attended the Tribes' Directors' meeting on two occasions. CCRP also conducted an input session with five of the eight local Tribes on April 27, 2022. The eight local Tribal Nations include:

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

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 8/15/2021- 2/14/2022:

- Weekly CWS MHST meetings (regarding Issue 1)
 - o Every Monday from 1-2pm
- Weekly CWS CQI meetings (regarding all issue areas)
 - o Every Friday from 2-3pm
- Bi-monthly CWS/CCRP meetings (regarding all issue areas), typically joined by Evident Change on the first Monday of every month
 - o 1st & 3rd Mondays from 2-3pm
- Weekly meetings were held with the CWS Deputy Director
 - o Every Wednesday from 2:30-3:30
- 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).
 - o 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)
 - o October 13, 2021 from 3-4pm
 - o October 20, 2021 from 3-4pm
- Three one-on-one meetings with two of the local Tribes
- CCRP conducted six input sessions with CWS staff to specifically discuss issue areas in the Judgment:
 - o October 25, 2021 with CWS ICWA staff
 - o October 27, 2021 with CWS CQI staff
 - o October 28, 2021 with CWS workforce staff
 - December 3, 2021 with CWS CQI staff to qualitatively code interviews with Tribal collaborators
 - o May 2, 2022 with CWS ICWA staff, focused specifically on CFTs
- Meetings with case review teams from CWS CQI, CWS ICWA program, and Evident Change:
 - o January 1, 2022, January 3, 2022
 - February 3, 2022 and February 11, 2022- comparative case review debrief and finalization
- One input session with the network of Humboldt County Family Resource Centers & Community Resource Centers
 - o May 11, 2022
- One input session with Tribal representatives
 - o April 27, 2022 with representatives from five local Tribes in attendance
- Meetings with the Attorney General's Office & County Counsel
 - As needed
 - Every other Thursday from February-May 2022

In some cases, meetings were rescheduled and/or canceled due to holidays or scheduled vacations of key staff. 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.

Report Limitations

As part of the monitor's scope of work, CCRP sought input from a variety of community partners and Tribal representatives. CCRP faced a couple of challenges to incorporate this input into the report. These challenges included: 1) Many of the corrective actions that CCRP assessed for the Stipulated Supplemental Judgment were internal processes and data, so it was difficult to find external stakeholders that had knowledge of internal processes and could speak specifically to whether or not corrective actions were completed, and 2) Community partners, in many cases, were confused as to what was in the Stipulated Final Judgment and what was in the Stipulated Supplemental Judgment.

Corrective actions in the Stipulated Supplemental Judgment did not include language that held CWS to a specific benchmark or target; CCRP's assessment is limited to an analysis of whether or not the specific corrective action was completed. While data and information that resulted from corrective actions is shared within the report, CCRP was not asked and did not assess or hold CWS to a specific benchmark to determine that a corrective action was completed. CCRP does note, however, that there was interest from community partners outside of CWS regarding performance on some of the issue areas discussed in the report.

Language in the corrective actions listed in the Judgment focused on creating processes for improvement and did not specify concrete outcomes for those processes. It is understandable that Tribal partners and other external community members are concerned with the overall efficacy of the actions compelled by the Judgment, rather than the internal processes enacted to achieve them.

Additionally, data and metrics, while important, should not be the only measure used to determine the overall performance of the department. The quality of the relationships and collaboration between CWS and the community and Tribal partners was of high importance but is difficult to measure using standard assessment techniques. Furthermore, it was not referenced specifically in the Judgment and thus was not in the scope of work for the monitor to address.

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). Continuous Quality Improvement, as distinguished from Quality Assurance, which focuses its inquiry on past performance², began with a shift to outcomes-based reviews starting with the Child Welfare System Improvement and Accountability Act (AB 636) in 2001. The use of a qualitative case review process was mainstreamed into county practice in California starting in 2012, when CDSS issued Memorandum ACYF-CB-IM-12-07. Throughout the term of the Judgment, Humboldt County has worked to build a robust CQI program as a distinct unit within the department.

The goals and mission of the CQI program within CWS are discussed in CCRP's first monitoring report. Please refer to that report for additional background information.

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

² https://www.cdss.ca.gov/lettersnotices/entres/getinfo/acin/2016/i-84 16.pdf and https://www.cdss.ca.gov/inforesources/child-welfare-program-improvement

- Quality improvement plans focused on mental health screenings and referrals and child and family team meetings.
- Cross-reporting tools and protocols to improve collaboration with external partners.

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) are utilized to track data and strategies to improve performance at the department level.

From August 15, 2021 through February 14, 2022, CWS CQI articulated and implemented a structure for how compliance dashboards and QIPs are initiated and utilized. Monthly compliance dashboards are a tool that COI can use to monitor progress on any area identified by the department and/or CWS community partners. The process for working with programs remains the same as previously reported-key goals and metrics are identified and monitored monthly for progress. Most goals and metrics are tracked against the average performance for all counties in the state, though there are notable exceptions in Judgment areas such as those under Tribal Collaboration which are not tracked at the state level. Benchmarks are determined internally based on "SMART3" goals, and may look to match state performance, exceed it, or meet a lower threshold depending on historical performance (with an eye to sustainable improvement over time). Based on monthly compliance monitoring by CWS, when performance does not meet department or state expectations, the issue is elevated to a QIP. All QIPs are reviewed at the end of each calendar year, at which point they will either be retired (if goals have been achieved) or renumbered and carried forward into the next year. When a QIP is retired, data can still be monitored using the monthly compliance dashboard to ensure that performance is maintained over time. Over the course of the monitoring period, all QIPs enacted have continued to be monitored in monthly dashboards even after targets have been reached, making this practice de facto policy. As the program matures and more QIPs are enacted, a strategy for evaluating which metrics should continue to be tracked after compliance is reached, and which should be retired from monthly monitoring will become a necessity. CWS is currently thinking through what internal policies should govern decision-making on this moving forward.

While the dashboard serves the function of monthly monitoring and provides a mechanism for the department to set goals for performance, the QIP documents strategies and changes in practice to improve performance. If performance meets the standards set by the department, or those required by law, monthly monitoring is adequate. If performance falls below the target, a QIP allows staff to identify and implement strategies to improve performance. Monthly updates of the QIP ensures that metrics are assessed and interpreted, possible data gaps or underlying bias is investigated, and staff engage in brainstorming sessions to propose new strategies to

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³ "SMART"- Specific, Measurable, Achievable, Relevant, and Time-bound.

pursue. Implementation of strategies are documented so that the evolution of interventions, and their possible impact, can be tracked and reviewed over time.

CWS has also created a system reform "report card" which includes performance data covering a variety of areas, including staffing, intake, Structured Decision Making (SDM) for investigations, complaints and community feedback, Tribal collaboration, cases & placements, cultural coaching and training, and child outcome measures. The creation of this report card was motivated by feedback from Tribal collaborators; it is one tool that CWS can use to share information about performance measures with the broader community. The report card shows historical performance, percent change over time, and benchmarks set for each improvement area (same as any existing QIP). These areas also include caseload per social worker, cross reports to law enforcement, investigation timeliness and backlogs, CFT and MHST data. The report cards go into more depth than monthly dashboards in disaggregating information for ICWA and non-ICWA cases and reporting on outcomes for Native American children in the child welfare system. Report cards were produced and circulated January 2021, June 2021, August 2021, and May 2022, though CWS notes that there is less interest expressed in them recently.

Monitor's Assessment: CQI Program

During the monitoring period, CCRP observed the CQI program in operation. Over the course of implementing necessary interventions to deliver on the areas in the Stipulated Supplemental Judgment, CWS has concurrently developed its CQI program to integrate these processes across other program areas and ensure that "continuous quality improvement" means in perpetuity. 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.

The CQI program has matured over the course of the monitoring period. Program staff have articulated in more detail how the program will function and serve its intended purpose to lead and support continuous quality improvement efforts. A couple of examples of this include:

- Use of data dashboards and QIPs- how and when
- Integration of case reviews into ongoing practice
- Articulation of feedback loops between CQI staff and other CWS programs, through collaboration with program managers and integration into regularly scheduled unit meetings.

CWS CQI provides a necessary vehicle for the department (as a whole and at a program level) to initiate data-driven assessment and reform processes, and to do so formally and (as its name implies) continuously rather than in ad-hoc efforts. Documentation provided to the monitor, along with discussions with CQI staff, substantiate that the department has formalized its role in monitoring performance, initiating change, and supporting progress over time, and also understands its capacity constraints when it comes to staffing the hours needed to take on some of the improvement processes it identifies. Contracting out work for which outside expertise is available and beneficial has assisted the department in this regard. Partnerships will continue to be key for CQI to advance the reforms that it initiated on the Judgment's impetus.

IV. Overall Assessment of Progress

Over the course of the monitoring period for the Stipulated Supplemental Judgment, Humboldt County CWS has invested in many initiatives to improve practice and grow their capacity to monitor and self-assess their performance early and often with respect to the key aspects of their mandate captured in the Judgment. The expansion and formalization of CQI department functions are evidence of this.

As the compliance monitor, CCRP has provided an independent assessment as to whether or not specific corrective actions listed in the Stipulated Supplemental Judgment were completed. CCRP's assessment, described in full in this report, is that CWS has completed all of the corrective actions. However, to provide more context and a systems level perspective to the report's audience, CCRP has discussed areas of interest to Tribal and other community partners, while still interpreting compliance strictly based on the specific language in the Judgment.

During the monitoring period, the impact of COVID 19 continued to reverberate across the Social Service sector in rural and remote counties. In many of the areas in which the department was compliant with the terms of the Judgment but in which performance did not respond substantially to corrective actions, short staffing and other disruptions caused by the pandemic were contributing factors. Turnover across the sector created additional obstacles to collaboration and communications with external partners, as noted by CWS staff and Tribal representatives repeatedly in sessions with the monitor. The shift to remote work affected the quality of meetings between CWS and Tribal social workers, and CFTs.

Outstanding Corrective Actions- Update

The following outstanding corrective actions were identified in the previous report:

- Case reviews, Issues 2, 3, & 6
- Child and family team stakeholder survey, Issue 4
- Data integrity & progress on annual goals, Issues 1, 4, & 7

Results for the case reviews were submitted to the monitor on February 14, 2022. The case review methodology was completed and carried out as formulated. Evident Change and CWS CQI worked in advance to create a review plan designed to be ongoing, specifying the timing of case review exercises and sampling strategy to be used so that CWS can mainstream the practice into their quarterly work plans moving forward.

CCRP verified the case review results by reviewing raw data provided by CWS, replicating elements of the methodology to confirm results, and observing several meetings in which reviewers discussed their assessments and surfaced any outstanding issues (including assessing for inter-rater reliability and checking the wording of Tribal collaboration checklist questions). In addition to fulfilling the technical requirements of the Judgment, CCRP has observed and documented further developments which, while occurring outside of the monitoring period, are encouraging signs that Humboldt County CWS is mainstreaming case review practice into ongoing CQI work.

CCRP's assessment is that all actions related to case reviews outlined in the Judgment were carried out, and CWS has invested in training staff, creating a plan, and accessing ongoing

technical assistance to make case reviews a regular part of their quality assurance work in the future.

Figure 2. Summary Case Review Results

Case Review Area	Total Sample	Comparative Review	Results	Recommendations by Reviewers	
Issue 2: SDM Intake	47 cases, 11 involving AI/AN children	All cases reviewed by CQI. 10 cases reviewed by EC, 11 cases involving AI/AN children were reviewed by the ICWA manager.	The correct screening decision was reached in 89% of cases. The tool recommendation matches the action taken in 96% of cases.	Clarify with staff the documentation needed to determine duplicate reports, how to connect behavioral details with SDM tool, that "Unknown is different from not asked".	
Issue 3: SDM Investigations	40 cases, 17 involving AI/AN children ⁴	All cases reviewed by CQI. Ten cases reviewed by both CQI and EC.	The final tool recommendation was correct in 87% of cases.	Train staff to consider full history and makeup of household, "Unknown is different from not asked".	
6: Tribal by Collaboration at Intake tear		All cases reviewed by CQI. Five cases reviewed by all three teams- CQI, ICWA, EC.	The Tribe was contacted within 24 hours in 77% of cases. Pertinent information from the Tribe was documented in a collaborative tone in 36% of cases. Tribal input included in narrative in an appropriate way in 36% of cases.	Train staff on documenting tribal contact and instruct them to make multiple attempts.	
Issue 3, Issue 6: Tribal Collaboration during Investigations	21 cases	All cases reviewed by CQI. Five cases reviewed by all three teams- CQI, ICWA, EC.	The investigating social worker requested a joint client contact with the Tribe in 95% of cases.	Staff instructed to complete Tribal Collaboration Checklist in addition to documentation in CWS/CMS.	

Work to administer and analyze the Child & Family Team Stakeholder Survey was completed and results submitted to the monitor on February 18, 2022. The survey was administered in accordance with CDSS's process. The survey was developed by CDSS and Humboldt County CWS will continue to use it to evaluate CFTs. CDSS holds and manages the resulting data and, for privacy purposes, did not release raw data to CCRP. Summary results of the survey can be found in Section V.

Data integrity efforts continued 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

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⁴ The Judgment did not stipulate that an ICWA review be done for this issue area.

CWS policy and procedures. In addition, CWS did report on progress toward the annual goals for Issues 1 & 4. For a detailed assessment of this work please see Section V.

Assessment by Judgment Area

Area 1. Interagency Protocol

Issue 1. Mental Health Screening & Referral

CWS completed the corrective actions for this issue area. CWS data shows an increase in timely mental health screening and referral over the course of the monitoring period- from 39% to 73% of cases. CWS has made significant efforts to ensure that staff are trained to complete the Mental Health Screening Tool (MHST) for all open cases. Completed MHSTs are sent to County Behavioral Health; the determination about provision of services is at the discretion of County Behavioral Health. CWS has developed systems to coordinate and track data to monitor compliance with this policy. Data verification efforts⁵ were completed to ensure that all MHSTs sent to County Behavioral Health are tracked in CWS/CMS, and CCRP has determined that CWS has a robust system in place to ensure MHSTs are completed in a timely manner according to department policy and procedure.

Stakeholder input from County Behavioral Health verified that MHSTs are coming in at a higher frequency and that information contained within the completed tools is more useful and actionable than the version of the MHST that was being used prior to the first Judgment. The representative from County Behavioral Health indicated that, while timely MHSTs are important, the most important thing for CBH is that the MHST is fully completed and done in collaboration with someone who can speak directly to the child's behavior.

Feedback from community partners suggested that there is a high level of interest in understanding the relationship between mental health screening and referral, and the actual link to and receipt of mental health services. Community partners wanted to know what happens after a child is screened and referred. This data is not tracked by CWS as they do not provide these services.

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

<u>Issue 2. New Investigative Decisions</u>

CWS completed the corrective actions in this issue area.

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. Evidence provided verifies that supervisor-level approval is documented in 99% of cases; the CWS/CMS system requires this approval for all cases.

⁵ Data verification conducted by CCRP included independently duplicating data pulls in SafeMeasures, and reviewing raw data pulled from CWS/CMS. This occurred across all areas in which SafeMeasures is used.

In collaboration with Evident Change, CWS and relevant program leads conducted case reviews using the *California SDM Intake Supervisory Referral Reading* fidelity tool and disseminated the results to relevant stakeholders and Tribal representatives per the terms of the Judgment. The scope, selection, and timing of the cases followed correct protocol advised by Evident Change. Copies of the aggregated results were furnished to CWS administration and the Tribes to inform CQI strategic planning. The specific area the Judgment identified for action concerned new reports being made on open cases. Forty-seven such cases were reviewed by CQI, 11 of which involved children with or eligible for Tribal affiliation. Ten of these cases were the subject of a comparative review by CQI, ICWA program, and Evident Change readers.

For all issue areas, the reviewers determined that correct screening decisions were made in over 89% of instances, and the action taken matched the tool recommendation in 96% of instances. There was no statistical difference between ICWA and non-ICWA case outcomes in these samples. This result is viewed favorably by the department. Reviewing teams were still able to identify strategies for improvement, which are reported in Section V.

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. Section V also reports on further work conducted by CWS to continue efforts on this issue beyond the monitoring period.

Issue 3. Thorough Risk Evaluation

CWS completed the corrective actions related to this issue area.

Thorough risk evaluation was assessed through a case review process that relied on the tool developed by Evident Change for all California Counties- the *California SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading* tool. Forty such cases were analyzed by CQI, 17 of which involved children with or eligible for tribal affiliation. CQI perceives the outcomes of this analysis positively; in 87% of cases the correct recommendation was reached. There was no statistical difference between ICWA and non-ICWA case outcomes in these samples. Reviewing teams were still able to identify strategies for improvement, which are reported in Section V.

CWS also reports that they have expanded the scope of their inquiry beyond the terms of the Judgment and are conducting a second round of case reviews against the *California SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading* tool, examining all new reports rather than just new reports made on open cases per the Judgment. This is a positive indication of intent to continue and deepen case review practice by the department over the course of its regular operations.

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 completed actions related to this issue area. From July 2021 through the end of the monitoring period, CFT practice was subject to a department QIP. The QIP was updated on a monthly basis and documented the percentage of open cases in which a documented qualified CFT or unqualified CFT had been held.

The department strove to increase the number of cases with a documented CFT from 16% to 22%, which is approximately the state average on any given month. At the close of that QIP on December 31, 2021, the goal had not been met so the QIP was refreshed for the 2022 calendar year. Data integrity efforts continued throughout the monitoring period and beyond to ensure that meetings that do qualify as CFTs are captured in CWS/CMS. In completing the corrective actions, CWS learned that timely CFTs need to remain a priority for the department. CFT practitioners elaborated in discussions with the monitor that there are often instances where it is either inappropriate for the child to take part in the sessions (or all of the session), or where a child (teenaged) may arrive to the CFT but refuse to join the session due to ongoing issues with the caretaker. These occurrences impact the department's qualified CFT numbers. Documentation in CWS/CMS continues to be an issue which sometimes results in under reporting CFTs- there are many screens to complete and duplicate questions, and if things are not done properly the system does not allow the social worker to save the meeting data. This may result in the worker putting data entry off until later and for some meetings to go undocumented in the system.

Echoing the perspective that while timely MHSTs are important, it is also important that they are completed collaboratively; feedback received on CFTs generated a similar perspective. While timely CFTs are important, it is also important that CFTs have participation and buy-in from those invested in the child's safety and well-being. Social workers expressed that CFTs can be very useful as a tool at multiple points in the process, rather than at a strict six-month interval.

Feedback from Tribes and other community partners indicated that there is a high value in collaborative CFT meetings, and that it is important for families to have support from the Tribes or other services they are actively connected with, as these individuals really know the family and have valuable information to share. Information learned and discussed in CFTs can also help Tribes and other community partners to better support the family as they navigate the CWS system.

CWS also implemented the CFT stakeholder survey, which was formulated by CDSS who manages the resulting data. Results and analysis from that effort were circulated to Evident Change, CCRP, and relevant program managers on February 18, 2022, completing this outstanding requirement. The survey revealed issues with evolving practice around implementing CANS, which is a County Behavioral Health collaboration area (outside of CWS's jurisdiction). These challenges aside, stakeholders interviewed for this monitoring report expressed the utility of the CFTs.

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

All of the corrective actions were completed in Area 3. Additional data and feedback received and reviewed by CCRP is included to provide a broader context and to elevate input received from Tribal representatives during the course of the monitoring period. Work to improve and measure Tribal collaboration will benefit from continued leadership and guidance from the State and is ongoing work that will never be "done"- collaboration is not something that you can measure and complete and then move on. It is work that requires a constant commitment from

both sides to work together, work through differences, and understand each other's perspectives and experiences.

Data available from the California Child Welfare Indicators Project (CCWIP) indicates that Native American children continue to represent an outsized share of the department's current caseload. As reported in the CWS CMS Quarter 4 extract from 2021, Tribal children in Humboldt County enter the foster care system at a rate 12 times higher than their white counterparts, with 24 incidences per 1000 children⁶. Allegations of mistreatment of Tribal children trended down in 2020 and 2021; 2021 saw the fewest allegations for this group since 2012, with 305 reported (representing 12% of the department's total, despite being only 6% of the county's population). Allegations of mistreatment of Native American children are substantiated at a higher rate than those of their white counterparts, with 17% of allegations being substantiated compared to 10% for white children. Native American children are five times more likely to be the subject of an investigation than their white counterparts in Humboldt county (CCWIP data, 2021 extract).

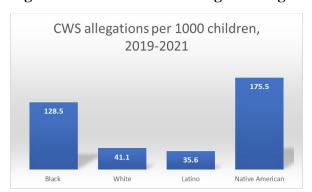


Figure 3: Child Abuse and Neglect Allegations in Humboldt County, by Race/Ethnicity

Source: Berkeley California Child Welfare Indicators Project 2021, Humboldt County extract

During the period preceding the Stipulated Supplemental Judgment, Humboldt County CWS worked closely with the eight federally recognized Tribes in the region to formulate the policies and procedures that currently guide practice for ICWA referrals and cases.

While the stipulations of the Judgment regarding contact at intake and during investigations have been addressed by CWS, the outcomes of these processes have not adequately improved on some key areas, in the view of Tribal Social Services Directors. CCRP received data from CWS which includes research efforts by their staff to assess performance on Tribal collaboration (including one-on-one interviews) and data from the CWS Office of the Ombudsperson. CCRP held a focus group session with Tribal Social Services Directors and supervisors to further substantiate insights garnered through other means. It should be noted that data gathered through the Tribal collaboration fidelity tools does not necessarily mesh with Tribes' reported experience of collaboration.

For more discussion of perspectives from Tribal representatives, please refer to Section VI of the report.

⁶ https://ccwip.berkeley.edu/childwelfare/reports/EntryRates/MTSG/cws/cwsCw/s

<u>Issue 5. Development of Fidelity Tool</u>

CWS completed this corrective action. The department developed the Tribal collaboration checklists with assistance and consultation from Evident Change and used it as the basis for the case reviews. The department used feedback and analysis provided by Tribes in previous reform efforts to formulate the checklist. A process for continuously improving the checklist through routine reviews with Tribal collaborators and the ICWA program has been established. It is envisioned that this will be carried out as a function of weekly ICWA program meetings with Tribal collaborators, during annual goal setting and review.

CCRP notes that, while the fidelity tool was completed and utilized, it should be subject to review and additional revisions based on changes in policy and procedure and/or feedback from Tribal representatives.

Issue 6. Case Reviews

Case reviews were completed and findings circulated to relevant parties per the terms of the judgment on February 14, 2022. The scope, timing, and sampling techniques used were consistent with guidance provided by Evident Change. The review opted for a comparative case reading approach, which garnered additional insights into the cross-reader reliability of the tools and helped identify new areas in which staff could benefit from technical assistance and training. In observing this process with CQI staff and other program managers and reviewing the documentation, the case review process with Evident Change was found to have high value to the CQI for identifying areas for improvement, but also useful in building staff capacity to integrate case reviews into ongoing work at the county.

The outcomes of Tribal Collaboration case reviews using both the Tribal Collaboration at Intake and Tribal Collaboration during Investigations checklists indicate there is room for improvement to increase the frequency of contact and quality of collaboration with Tribes documented in CWS/CMS.

While CWS reports that their Social Workers request contact with Tribal collaborators in 95% of cases that have been referred for Investigation, only 36% of cases documented collaborative Tribal input in the system. Tribes were notified of new referrals in 77% of instances according to the data reported from CWS/CMS. The department has expressed concern over these findings and elevated the priority of addressing this disparity. Some of these strategies are reported in Section V Area 3. CWS has indicated their intention to develop CQI QIPs to improve outcomes in this area.

Issue 7. Tracking/Reporting Contacts with Tribal Representatives

CWS has completed Actions 3, 4 & 5. CWS policy and procedures direct staff to document all contacts made with the family in CWS/CMS. Unlike the MHST and CFT corrective actions that speak to consistent use of CWS/CMS for documentation purposes, there are no standard reports available in SafeMeasures to measure timely entry of all contacts in CWS/CMS. CWS continues to use a business intelligence tool to create a custom report with this information.

This is another area of the Judgment where information gained from completion of the corrective action has surfaced data that should inform future CQI efforts. Data gathered during the completion of the corrective actions (particularly the results of case reviews, summarized above)

suggests room for improvement and the need for additional assessment activities that provide context to the complexity of collaborative joint contacts. All counties in California would be better served by some standardized reporting tools and regular ICWA case reviews to allow CWS departments to quickly and efficiently run reports that allow them to accurately assess their performance in areas related to Tribal collaboration.

V. Progress on Items in Stipulated Supplemental 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 (8/15/2021-2/14/2022)

CWS has completed 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 have been completed to ensure that all screenings and referrals are documented in CWS/CMS and cross-reported to County Mental Health. Between August and December of the monitoring period the Department instituted several policies as part of their QIP for MHSTs, resulting in a 30% increase in cases with a screening, outperforming the state average. This progress continued into 2022 and is actively being monitored using monthly dashboards.

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.

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. Active efforts were made to increase the number of active cases in which the child is screened and referred in a timely manner during the second monitoring period. Details about how staff are trained and supported can be found in the previous report.

To systematically track all mental health screenings and referrals and ensure that they are properly documented in CWS/CMS, the following data integrity process was implemented by CWS:

- CWS CQI generates an ongoing weekly report to all supervisors that shows outstanding actions needed for MHST
- CWS CQI staff monitor the MHST email box on an ongoing basis and conduct checks to ensure that all MHSTs sent to mental health are properly documented in CWS/CMS.

CWS demonstrated to CCRP the email inbox and how the process for data verification works and shared examples of the weekly report that goes to supervisors. CWS CQI staff continue to monitor the MHST email box to ensure that all MHSTs sent to Mental Health via email are correctly documented in CWS/CMS.

County Mental Health tracks outcomes- every referral they receive from CWS, which get screened out or in, who accesses services and outcomes, but this information lives in a different database managed by County Mental Health.

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 (8/15/2021-2/14/2022)

This action has been completed. Full compliance has been achieved. 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 has independently verified 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.

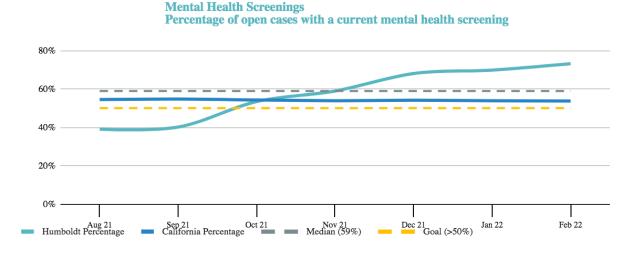
Progress Update

Reports related to mental health screening and referral data entered in CMS/CWS are accessible 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 Behavioral Health; all actual assessments pertaining to specific recommendations of mental health services are determined by County Behavioral Health and not CWS. 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 behavioral health services, please see data in Figure 5 pulled from SafeMeasures by CCRP.

Figure 4 illustrates the percentage of timely screenings completed. This chart was pulled directly from the CQI monthly dashboard. Figure 5 reflects both the number and proportion of timely screenings compared to the overall number of cases.

Figure 4. Mental Health Screenings: Percentages of Open Cases with a Current Screening



Data Source: CWS/CMS, August 2021-February 2022

Figure 5. Number and Percentage of Children in an Open CWS Case who have had a Timely Screening and Referral to Mental Health Services by Month*

Month	Screening Current		Screening Overdue		Cases Overall
	#	%	#	%	Total
August 2021	201	39.0	314	61.0	515
September 2021	200	40.0	300	60.0	500
October 2021	257	53.3	225	46.7	482
November 2021	279	58.9	195	41.1	474
December 2021	327	67.7	156	32.3	483
January 2022	339	69.5	149	30.5	488
February 2022	353	72.6	133	27.4	486

^{*}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 (8/15/2021-2/14/2022)

This action has been completed. Full compliance has been achieved. CCRP has verified that the actions described below continued through the end of the second monitoring period. Compliance data was also provided to CWS staff, administration, CCRP and the AG's Office on a monthly basis. CCRP reviewed and assessed the monthly reports, and independently verified the data in SafeMeasures.

Progress Update

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. CCRP verified that monthly reports are compiled and integrated into the dashboard 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. As is discussed below, because the department exceeded their annual goal, in January 2022 the monthly report transitioned from a QIP to a monthly dashboard.

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

Monitor Assessment (8/15/2021-2/14/2022)

This action has been completed. In February 2021 CWS began tracking data on a monthly basis, and in July 2021 they set an annual goal that 50% of cases will have timely screening and referrals to Mental Health by 12/31/2021. During the second monitoring period, the proportion of cases with timely screening and referrals increased from 39% to 72.6%. CCRP has continued to receive monthly dashboards from CWS beyond the second monitoring period, indicating the department's continued commitment to monitor performance in this area.

Progress Update

In January 2022, review of QIP 21-01 revealed that CWS had exceeded their annual goal of 50% by 12/31/2021. At that time QIP 21-01 was closed and CWS began utilizing a monthly MHST compliance dashboard. As of February 2022, Humboldt County reported 73% of open cases with a current mental health screening, compared to statewide performance at 53%.

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 (8/15/2021-2/14/2022)

This corrective action has been completed. As discussed below, CWS CQI proactively established a quality improvement dashboard in July 2021 to monitor and improve compliance towards timely mental health screenings and referrals. In January 2022 QIP 21-01 was closed and CWS CQI transitioned the monthly report to the MHST Compliance Dashboard. In January and February 2022, the percentage of timely mental health screenings and referrals stayed above the goal of 50%, so it was not necessary for CWS to initiate a quality improvement plan.

Progress Update

Efforts made by the department to increase the proportion of timely screenings and referrals have had positive results. The proportion of timely screenings and referrals increased from 39% to 72.6% between August 2021 and February 2022.

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

<u>Issue 2. New Investigative Decisions</u>

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". Structured Decision Making (SDM) was first piloted in California in

1998 and is now policy in 58 counties. Evident Change, the child welfare expert named in the Judgment, created these SDM tools and last revised the hotline tools used in Humboldt County in 2021.

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 (8/15/21-2/14/2022)

CWS completed this corrective action. 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. Reports pulled from CWS/CMS indicate that of 1,361 referrals, 98% (1,331) were approved by a supervisor, and an additional 1% were approved by a program manager.

Progress Update

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. 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 (8/15/2021-2/14/2022)

CWS has completed work on Action 2. Specific to this corrective action, the *SDM Intake Supervisory Referral Reading* tool was used to review referrals to determine the proportion of reviews where Question 4- "Was the correct screening decision reached?" was answered yes. CWS CQI completed 47 case reviews using the *California SDM Intake Supervisory Referral Reading* fidelity tool, while CWS's ICWA program reviewed 11 referrals from that pool that involved Tribal children, and Evident Change reviewed another subset of 10 referrals. CWS turned over the raw data from these reviews to CCRP on 2/9/2022. The results of case reviews and comparative analysis were compiled into a dashboard and shared with leadership and program managers within CWS and Tribal collaborators on 2/14/2022.

Results from that exercise indicate that the correct screening decision was reached in 89% of referrals, and the action taken matched the tool recommendation in 96% of these instances. There was no statistical difference between ICWA and non-ICWA referrals. CWS has elaborated plans for integrating lessons from case reviews into CQI and strategic planning in the future, by creating dashboards, circulating guidance to programs, and creating more opportunities for coaching and technical assistance to correct issues identified through the case review process

CCRP verified these results by comparing individual reviewer's fidelity tool exercises to aggregate results, duplicating elements of the sampling strategy, and sitting in on meetings in which reviewing teams discussed their findings.

Progress Update

CWS completed case reviews for this action. Forty-seven referrals involving children in an open case or referral were reviewed to determine whether an appropriate screening decision was made at intake, per the SDM guidance. Of those 47 referrals, 11 involved Native American/Alaska Native children.

The following case review process was determined with Evident Change, and used to carry out case reviews for this issue area:

- 1. Timing: Cases were selected from a six-month period from January to June 2021.
- 2. Sample size: Using the total number of cases received in a six-month period (482), accepting an 85% confidence level and 10% margin of error, 47 cases would be considered a representative sample. The sample was stratified to ensure that proportion of AI/AN referrals reflected their proportion in the CWS caseload, resulting in 11 ICWA cases for review.
- 3. Scope: With input from both Evident Change and CCRP, the case review team determined that questions four and six from the *California SDM Intake Supervisory Referral Reading* tool were the correct focus as they correspond exactly with the issues identified in the judgment:

Question 4: "Was the correct screening decision reached?"

Question 6: "Does the tool recommendation match the action taken?"

4. As comparative case readings were desired, a portion of the sample was reviewed by analysts in CWS CQI, Evident Change, and ICWA. CQI reviewed all 47 referrals, 11 of the referrals which represented NA/AN children were also reviewed by the ICWA program manager, and 10 referrals were also reviewed by Evident Change.

- 5. Reviewing teams each took slightly different approaches, some filling out the entire SDM Intake Supervisory Referral Reading tool, others just focusing on the questions which pertain to the judgment (Questions 4 and 6). Evident Change provided comments explaining their reasoning on several determinations.
- 6. CWS CQI analysts compiled all the results from the three reviewing teams into a spreadsheet and highlighted reviews in which there wasn't agreement by the reviewers, as well as tallying the proportions in which the correct screening decision was made and recommended action taken.
- 7. Meetings were held in which case reviewers had opportunities to ask questions, discuss reasoning for their evaluations, especially in cases where reviewers made divergent determinations.
- 8. Ultimately, the final results were compiled into dashboards which were circulated to relevant stakeholders within CWS and to Tribal collaborators. In response to Question 4: "Was the correct screening decision reached", reviewers found that the answer was "Yes" in 89% of the reviews. For Question 6: "does the tool recommendation match the action taken", the answer was "Yes" in 96% of the cases reviewed. Disaggregated results revealed no difference in outcome for ICWA vs. non ICWA cases.

The case review exercise generated insights aimed both at improving department performance on SDM at intake on referrals with an open case, but also to build CWS CQI's competence in using case reviews for quality assurance and to improve performance moving forward. Insights generated by the exercise and captured in the circulated dashboard include strengthening connection between the reporters narrative and SDM language, learning how to properly identify and document duplicate reports, deploying better guidance and instruction on use of the override, deploying better guidance and instruction on following up with the current social worker in ongoing cases, and documenting when information is unknown so it can be distinguished from "not asked" in report narratives.

The results of these case reviews were completed and circulated in the last week of the monitoring period (on 2/9/22), however CWS has continued to provide the monitor with updates on how they are integrating these lessons and mainstreaming case review practice into regular CQI work. At present, CWS CQI is conducting a second round of SDM Intake case reviews, this time looking across all cases and not just referrals based on new reports generated on open cases, as one example.

Applicable to this area and all use of SDM tools, CWS has contracted Evident Change to host monthly technical assistance sessions for any staff that wish to attend. CCRP has observed these sessions. Topics are crowd sourced, with staff encouraged to email questions four days or more in advance of the session. From there, screener narratives or other case documentation are selected from CWS's actual caseload which feature the issue in question and can be used as a learning tool. The Child Welfare expert highlights sources of guidance, other information which should be checked in CWS/CMS or sought, and guides session participants as they weigh which actions should be taken in the case scenario and justify their conclusions.

By using real referrals (that are redacted of any client identifying information) and inviting staff to work through decision making with reference to applicable guidance, the sessions provide much of the same benefit a case review exercise would, are able to target specific issues and scenarios, are "demand driven" by staff priorities, and in one session observed helped the department at large access technical expertise interpreting an important change in statewide policy.

<u>Issue 3. Thorough Risk Evaluation</u>

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 (8/15/2021-2/14/2022)

This action was completed during the previous monitoring period, February 15, 2021- August 14, 2021. The Tribal Collaboration checklists were the basis for case reviews completed to assess contact at intake and collaboration during investigations. In consultation with Evident Change,

CWS has committed to refining and revisiting the checklist over time and incorporating feedback from Tribal representatives as needed, so these checklists may be thought of as living documents. Additionally, analysis of case reviews involving Tribal children held an objective of reviewing the language on the checklists to ensure consistent interpretation by raters.

Progress Update

In the previous monitoring period, CCRP provided information about how Tribal contact and collaboration tools were formulated. 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 were based on policy that was co-created by CWS and County Tribes prior to the first monitoring period of the Stipulated Supplemental Judgment. They are used to address issues in Tribal collaboration and are discussed in that section as well.

Evident Change furnished additional recommendations to CWS including creating definitions for each item on the collaboration tools (completed), more clearly define "sufficient notice and opportunity for joint visits" and that CWS should continue efforts to collaborate with Tribal departments to maintain, update, and promote use of the collaboration tools.

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 (8/15/2021-2/14/2022)

CWS has completed work on Action 2. Three review teams from CWS CQI, CWS ICWA, and Evident Change completed 28 case reviews using the Intake- Supervisor Tribal Collaboration Checklist; all referrals involved Tribal children. CWS turned over the raw data from these reviews to CCRP on 2/9/2022. The results of case reviews and comparative analysis were compiled into a dashboard and shared with relevant stakeholders within CWS, with Evident Change and Tribal collaborators on 2/14/2022. CWS has elaborated plans for integrating lessons from case reviews into CQI and strategic planning in the future. Predominantly, these strategies focus on enforcing to staff the importance of the policies and providing training on considerations for ICWA cases.

Reviewers found that in 23% of cases, notification was not given or not given in a timely manner. Documentation pertaining to Question 6 (Inquire and document information from the Tribe in a positive collaborative tone, free of bias) was found to be insufficient in 64% of the cases by the reviewers. The same was true for Question 7 (Include Tribal input in the screener narrative with date/time of contact and information provided), where reviewers found that 64% of cases did not properly document Tribal input in a collaborative manner.

CCRP verified case review results by comparing individual reviewer's fidelity tool exercises to aggregate results, duplicating elements of the sampling strategy, and sitting in on meetings in which reviewing teams discussed their findings.

Case reviews are intended to highlight areas of daily practice where improvements are needed, and, by completing this corrective action, CWS has been able to pinpoint and identify specific areas where improvement is needed. These results highlight that progress is still needed to improve collaboration with the Tribes, and the important role that future case reviews will play in gathering data to measure the complexities of Tribal collaboration. Case review results were backed up by similar concerns expressed by the Tribes to CCRP during the Judgment input session.

Progress Update

Collaboration at Intake

A core concern of the Judgment was whether or not Tribal collaborators were being contacted within 24 hours of receiving the referral, and whether the screener properly documented this contact and subsequent input from Tribal social services in CWS/CMS. A set of case reviews was conducted using the Intake- Supervisor Tribal Collaboration Checklist. The questions from the checklist deemed appropriate by CWS and Evident Change for assessing this area of the Judgment were:

Question 5: Was the referral involving a child who is a member of or eligible for membership and 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 practicably possible?

Question 6: Inquire and document information from the Tribe i.e. family history, current circumstances, and any worries, in a positive collaborative tone, free from bias?

Question 7: Include Tribal input in the screener narrative with date/time of contact and information provided? Including all efforts of collaboration, in a positive collaborative tone clear and free of bias?

These questions were identified as core to the concerns of the Judgment, as determined with consensus from Evident Change and CCRP. The case review process carried out and verified by CCRP is described below:

- 1. Timing: The sample comprised *all* referrals received in August 2021.
- 2. Scope: The sampling strategy for case reviews related to Area 3 diverged from that of the SDM intake tool discussed above. For the Tribal collaboration at intake focused reviews, all referrals made in August 2021 with an ICWA component were subject to review using the three checklist questions stated above.
- 3. Sample size: As the strategy was simply to look at all ICWA referrals made in August, the sample is the full population of those referrals from that month, 32 referrals. Four referrals were later found to have been incorrectly identified as Tribal children and were removed from the sample resulting in 28 referrals in total.
- 4. As comparative case reviews were deemed desirable by CQI and Evident Change, three teams of reviewers conducted the reviews: CQI, managers from CWS's ICWA program, and Evident Change. CQI reviewed all 28 cases; ICWA program and Evident Change reviewed a subset of five referrals respectively (such that these five were examined by all three reviewing teams).

Reviewers found that in 23% of cases, notification was not given or not given in a timely manner. Documentation pertaining to Question 6 was found to be insufficient in 64% of the cases by the reviewers. The same was true for Question 7, where reviewers found that 64% of cases did not properly document Tribal input in a collaborative manner.

The themes identified for improvement were effectively to "do better"- prioritize contact, enforce the idea that multiple attempts must be made, and train social workers to diligently document, including date and time, all contacts in the system.

Other actions and strategies identified by CWS included:

1. Continue to revise and improve the Tribal Collaboration Checklists.

This is mentioned as a priority area under both the Intake and Investigations (see Issue Area 3-Tribal Collaboration) dashboards. Both fidelity tools will be subject to continuous quality improvement and responsive to the needs of Tribal collaborators. Should other entities engaged in child welfare practices across the state or nation develop tools and mechanisms to measure Tribal collaboration, CWS will integrate those efforts into future revisions of the tool. In collaboration with Evident Change, the Department is also pursuing use of qualitative methods to gauge CWS's performance on meaningful collaboration and help further define what 'meaningful' means in practice. Further, Evident Change noted that the collaboration checklist could benefit from a revision querying whether or not Tribal social workers were given reasonable opportunities to join joint visits.

2. Broaden scope of subsequent reviews to examine performance on all items in the checklists.

While the completed reviews focused their inquiry on the checklist items that correlated with specific items in the Judgment, reviewers often completed the checklist in its entirety. Through this process, the department gleaned additional insight into areas where current practice departs from the guidelines which the checklist was based on and seeks to incentivize compliance on these measures. Moving forward, CWS CQI has voiced commitment to more case reviews looking at those additional areas and launching QIPs as needed.

3. Provide additional training to staff to improve performance on collaboration at intake.

The California Tribal Families Coalition ran an ICWA Specialist Certification course from March through June 2021. Humboldt County sent 11 social workers to attend. Participants completed modules detailing ICWA considerations across all facets of CWS work- intake, investigations and assessment, placement, permanency planning, court, and important contextual considerations and general training on collaborating with Tribal partners, as well as the roles and obligations of ICWA specialists within their broader organizations. The program evaluation shared with CCRP reports on the results of pre and post workshop testing, revealing that participants substantially increased their knowledge and confidence in working with ICWA. The evaluation also identified areas where participants wanted to deepen their knowledge. Nearly all the topics mentioned there were about building trust, improving working relationships, learning Tribal collaborators' goals for the work and relational worldviews to support better collaboration.

In addition to participating in the certification course, CWS CQI has communicated that the ICWA program intends to hold bi-weekly training sessions for staff to troubleshoot improvement areas and give staff opportunities to access support on issues they identify. CWS continues to participate in the ICWA program development meetings every Friday morning. An annual goal setting session occurred during the second monitoring period with the following priorities identified:

- Staff training and development;
- MOU work between CWS and Tribal Nations, developing cooperation protocols;
- Establish a dispute resolution process;
- Begin co-facilitating CFTs;
- Develop standards for respectful and inclusive communication, utilize cultural coaches;
- Improve delivery of necessary documentation to Tribal partners in advance of court proceedings;
- Mental Health screenings completed in a timely fashion for Tribal families and followed up on.

CWS has also launched a custom Tribal Cross Reporting Application- details can be found under Issue Area 3- Tribal Collaboration. CWS CQI has expressed that due to the performance metrics on contact at intake that emerged from case review analysis, this area is their top priority for formulating QIPs in the coming months.

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 (8/15/2021-2/14/2022)

CWS has finished Action 3 with the completion of 40 comparative case reviews using the *California SDM Investigations/ Assessment and Emergency Response Supervisory Referral Case Reading* tool. The case review methodology was determined in collaboration with Evident Change, who also reviewed a subset of cases and helped provide support and recommendations in interpreting the results.

In response to Question 4: "Is the final tool recommendation correct", reviewers found that the answer was "Yes" in 88% of the reviews. There was no statistical difference between the ICWA and non-ICWA risk assessments. Results suggest that, in the majority of cases reviewed, an appropriate risk assessment was made per policy.

Progress Update

The case reviews were completed. The details regarding timing, scope, and sample size were developed collaboratively by CWS and Evident Change:

- 1. Timing: Cases were selected from a six-month period from January 2021 through June 2021.
- 2. Sample size: In consultation with Evident Change, a sample size of 40 risk assessments was selected. The sample was stratified to ensure that the proportion of AI/AN referrals

- reflected their representation in risk assessments, resulting in 17 ICWA cases for review (43%).
- 3. Scope: With input from both Evident Change and CCRP, the case review team determined that question four from the *California SDM Investigations/Assessment and Emergency Response Supervisory Referral Reading* tool was the correct focus as they correspond exactly with the issues identified in the judgment:

Question 4: "Is the final tool recommendation correct?"

- 4. Despite stratifying the sample, an ICWA program case review was not mandated by the Judgment. Comparative reviews were conducted by CQI staff for the whole sample, with Evident Change reviewing 10 risk assessments for comparative purposes. At CCRP's request case review results were later disaggregated to show results for ICWA and non-ICWA referrals side by side.
- 5. Reviewing teams each took slightly different approaches, some filling out the entire SDM Intake Supervisory Referral Reading tool, others just focusing on the question pertaining to the Judgment (Question 4). Evident Change provided comments explaining their reasoning on several determinations.
- 6. CWS CQI analysts compiled all the results from the three reviewing teams into a spreadsheet and highlighted reviews in which there wasn't agreement by the reviewers, as well as tallying the proportions in which the tool recommendation was correct. Meetings were held in which case reviewers had opportunities to ask questions, discuss reasoning for their evaluations, especially in cases where reviewers made divergent determinations.

Ultimately, the final results were compiled into dashboards which were circulated to relevant stakeholders within CWS and to Tribal collaborators. In response to Question 4: "Is the final tool recommendation correct", reviewers found that the answer was "Yes" in 88% of the reviews. There was no statistical difference in tool recommendation determinations between the ICWA and non-ICWA risk assessments.

In the six cases in which the reviewers found the tool recommendation to be incorrect (one of which was later reconciled upon discussion with Evident Change), four reviews found that the social worker choose not to promote, scoring the scenario 'moderate risk' when it should have been high; one review found that the social worker scored the risk high when it should have been moderate, and one review found that not enough documentation was provided by the social worker to inform a risk assessment.

While the outcome of the risk assessment case review- 88% correct determinations- was considered strong by CWS, analysis from the reviewers did generate two major strategies for improving performance. First, social workers will be directed to more thoroughly account for prior CWS history, including all members of the household in their assessment. Second, reviewers emphasized the importance of documenting clearly when questions were asked but no information provided, versus when questions were simply not asked of reporters and contacts.

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 (8/15/2021-2/14/2022)

CWS completed this corrective action. Dashboards with summary results from the *California SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading* tool guided reviews were circulated to relevant stakeholders within CWS, CCRP, Evident Change, and Tribal collaborators on 2/14/2022. CWS provided raw data in the form of case review templates filled out by each reviewer for each case to CCRP on 2/9/2022. Also provided in this monitoring period were spreadsheets collating case review results across different reviewing teams which formed the basis of CWS's analysis.

Progress Update

CWS circulated a dashboard with a summary of case review outcomes and next steps to relevant CWS departments and stakeholders, and Tribal collaborators on 2/14/2022, fulfilling the requirements of the judgment in this area. CCRP was additionally provided with each SDM Investigations/Assessment and Emergency Response Supervisory Referral Case Reading tool form used by each of the reviewers, and an excel spreadsheet which compiled the results and allowed for identification of disparate determinations across reviewing teams where applicable. Evident Change was in possession of all of these materials throughout the review process as well.

<u>Issue 4. Child and Family Team Meetings</u>

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 (8/15/2021-2/14/2022)

CWS has completed Action 1. CWS uses CWS/CMS to document CFT meetings. Analysts for each program area are responsible for monitoring and tracking staff completion of CWS/CMS documentation of CFTs. Analysts share the information with program supervisors who have responsibility for monitoring and evaluating staff. 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.

Progress Update

Active efforts continued to be made to ensure that all CFT meetings are documented in CWS/CMS, though this is an area in which social workers continue to request technical and capacity support to achieve 100% compliance. In a group discussion with social workers who conduct CFTs, several noted that there are multiple data entry screens to log these contacts, and the system for doing so is not intuitive, which results in delayed entry of CFT contacts.

In addition to these barriers, social workers also reported that instances in which it would be inappropriate or re-traumatizing for children to attend CFTs occur often, and this suppresses their performance numbers when it comes to logging qualified CFTs.

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 (8/15/2021-2/14/2022)

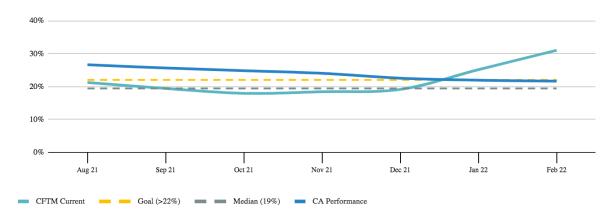
This action has been completed. CWS has provided evidence which has been independently verified by CCRP. CCRP independently ran a SafeMeasures report to verify the number and proportion of children in an open CWS case who have had a timely CFT meeting. CCRP received monthly reports summarizing CFT data from CWS/CMS, including the number and proportion of children in an open CWS case who have had a timely CFT meeting.

Progress Update

A CWS CQI analyst generates a monthly report using SafeMeasures that shows CFT status by case. 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. As is discussed below, because the department failed to achieve its goal, the 2021 QIP was reinstated in January 2022 and became QIP 22-01. Figure 6 is pulled directly from QIP 22-01.

Figure 6. Child and Family Team Meetings: Percentage of Open Cases with a Timely CFT

Child and Family Team Meetings (CFTM) Percentage of open cases with a current qualified CFTM



Data Source: CWS/CMS, August 2021-February 2022

Figure 7. Number and Percentage of Children in an Open CWS Placement who have had a Timely Child and Family Team Meeting by Month

Month	-			CFTM Overdue		Pending Initial CFTM		Closed nth	Cases Overall
	#	%	#	%	#	%	#	%	Total
August 2021	86	21.4	298	74.3	6	1.5	11	2.7	401
September 2021	77	19.7	295	75.4	6	1.5	13	3.3	391
October 2021	68	17.9	295	77.6	6	1.6	11	2.9	380
November 2021	71	18.6	292	76.6	15	3.9	3	.8	381
December 2021	73	19.4	267	71.0	12	3.2	24	6.4	376
January 2022	91	25.9	241	68.7	10	2.8	9	2.6	351
February 2022	107	31.6	209	61.7	12	3.5	11	3.2	339

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

Monitor Assessment (8/15/2021-2/14/2022)

CWS has completed this corrective action. Compliance reports relating to timely completion of CFTs are available to CWS staff and administration in SafeMeasures. In addition, CWS has provided evidence to CCRP that compliance reports were provided to CWS administration on a monthly basis as of July 2021 and through the end of the monitoring period. CCRP reviewed and assessed the QIP each month at the time of its release and independently verified the data in SafeMeasures.

Progress Update

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. As discussed below, the 2021 QIP was refreshed and became QIP 22-01 as performance in 2021 did not reach the department's goal.

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 (8/15/2021-2/14/2022)

Action 4 has been completed. CWS reviewed progress toward their annual goal in January 2022 and determined that they did not meet the goal of 22%. QIP 21-02, which was developed proactively by CWS in 2021, was refreshed and enhanced for 2022 and became QIP 22-01. The QIP will remain open for the duration of 2022 to monitor strategies and progress to improve the proportion of timely CFT meetings.

CWS has shared their intent to continue CQI efforts to improve performance in this area. CCRP notes that the corrective action does not hold CWS to a particular performance benchmark but instead requires the department to have a process in place to monitor performance and a mechanism to improve performance if it is not in line with the county's stated goal and state-level performance. CWS has demonstrated that this process is in place and provided additional documentation after the Judgment period as evidence that efforts will continue in this area.

Progress Update

QIP 21-02 ended on December 31, 2021 and the goal was not achieved by that date. In order to continue monitoring and implementing strategies to improve CFT compliance, a new QIP 22-01 was initiated as of January 1, 2022.

CWS employed the following strategies to improve compliance in QIP 21-02:

- Analyst generates and disseminates a monthly report showing CFT status by case.
- Reminders are sent to staff and supervisors to use the SafeMeasures "Data Issue: Missing CFTM Documentation" report for quality assurance on data entry at the program level.

• Staff are working to update case plans to ensure accuracy of the CFT frequency (every 3 months for children/youth receiving ICC services, every 6 months for all other children/youth).

Discussions with CWS staff reinforce the utility of CFTs in overall case planning. Social workers commented that they use CFTs in targeted ways, to get the family, their support community, Tribal and CWS social work staff on the same page. While policy calls for a minimum frequency of every six months, meetings can be called strategically during the case, at key points when a family is facing imminent risk of removal, post removal, or for case planning, change in service components, visitations, or planning for return. Workers reported striving to set meeting agendas for the subsequent CFT together so that everyone understands the goals they are working towards or will report on then. Workers also reported that for ICWA cases especially, holding regular CFTs provide higher quality opportunities for collaboration and shared decision making, when scheduling prevails for all parties to be present.

CFTs have also provided a means to engage cultural coaches and coaches with other subject matter expertise in cases. Social workers report that these resources are very beneficial to them in navigating tough cases with families and growing their knowledge of best practice for specific situations or behaviors.

Feedback CWS social workers provided to the monitor indicate that documenting CFTs can be difficult to complete in time and the screens that must be completed in CWS/CMS are not intuitive- under time constraints staff will leave this with the intention of completing it later and then forget to input information as required. Further input from staff should help CWS CQI better target their training to improve performance on documentation of CFTs in hopes of converging with state averages. The issue of appropriateness for minor participants will continue to impact Humboldt County's number of qualified CFTs reported.

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 (8/15/2021-2/14/2022)

Work on Action 5 was completed. A survey developed by CDSS was adopted and circulated to CFT participants, Tribal collaborators and appropriate CWS staff starting 12/8/2021. As the survey was optional there were some challenges soliciting responses, but ultimately 15 surveys (20 initial responses but a five-participant attrition on most questions) were completed and the results disseminated to CWS administrators, Evident Change and CCRP on 2/17/2022.

Progress Update

During the monitoring period, CFT meetings were being held over Zoom and in-person. For this and other reasons the survey format was online. The facilitator introduced the survey and provided participants with a link in the chat box. For in-person meetings, brochures were provided with a QR code that connected participants to the online survey. CWS managers promoted the survey and reminded staff to do the same at several staff meetings throughout

December (which they documented on 12/7, 12/8, 12/9 and 12/14), in addition to email communications to the relevant departments.

The design of the survey itself came directly from CDSS⁷, and is administered and all data held by CDSS, not Humboldt County. For this reason, the format of the CFT evaluation was constrained to the online survey. Raw data in the form of individual responses was not provided to or verified by CCRP. CDSS carefully controls masking of survey responses so no identifying information can be extracted. After collecting basic demographic information and understanding the respondent's role in the CFT, the survey probes the following areas:

- Who participated in the meeting and how much agency they had in planning the agenda and meeting logistics, bringing in important people,
- Whether important elements of the CFT process and CANS were explained beforehand so participants were empowered to participate fully,
- If strengths were discussed, and if the family was able to offer ideas for how to improve, if everyone felt free and encouraged to contribute to the case plan.
- Opportunities were given, in the form of open-ended questions, for participants to express
 their feelings about the process, what they would like to improve or what worked for
 them.

Five of the respondents (33%) were current caregivers of the focus child. Three were social workers, two were non-caregiving family members, one was a parent, one was an ICWA custodian, one was a sibling, two were CWS staff (other than facilitator), one was grandparent and one was a probation officer. In 40% of meetings recalled by participants, the child was present. The survey results indicated that nine of the respondents (60%) had participated in planning for the meeting. Half were briefed on the process, and nine participants were able to invite other important people in their lives to participate.

Two-thirds of respondents felt that they were able to contribute freely to the process, but just under half felt their ideas and suggestions were used to support the youth's case plan and goals. Eleven of the fifteen had not had CANS explained to them beforehand, nor does it appear to have been frequently discussed during the meetings. None of the participants had received a copy of the CANS report during or shortly after the meeting. In the comments, two participants noted that they received no information about CANS, one didn't know what it was. Notably, one comment expressed frustration that assessing for wrap services was not part of the plan, and that after advocacy by foster parents' medical providers held a separate CFT that used CANS to assess the child. Of the twelve who responded to the overall assessment questions, seven participants were satisfied or very satisfied with the process overall, and three were dissatisfied or very dissatisfied.

The dashboard which circulated the results from the survey did not identify actions CWS CQI intends to take to address the findings. Current QIP related to CFTs focus on quantitative improvement-holding more meetings- so it is unclear how these findings on qualitatively improving the CFT process and better integrating CANS will be addressed in the future.

⁷ More information on the survey, and CDSS's full resource library on CFT facilitation and CANS, can be found here: https://www.cdss.ca.gov/inforesources/foster-care/child-and-family-teams/resources

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.

<u>Issue 5. Development of Fidelity Tool</u>

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 (8/15/2021-2/14/2022)

As noted in the first monitoring report, CWS has completed Action 1. Due to the formative nature of these tools, they are considered "living documents" and may be subject to changes and updates based on evolving practice and/or input from Tribal collaborators.

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
 - o This tool assesses whether notification to Tribes at intake occurred.
- 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-making 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.

CWS implemented the following strategies between August 2021 and February 2022, some of which extended beyond the term of the Judgment:

- 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.
- Groundwork has been laid for cross-appointments and co-location between CWS and Tribal social workers and managers to promote better communication between the collaborators. Discussions for co-location have moved forward between Trinidad and Hoopa, and Social Workers will be stationed together at The Center at McKinleyville⁸.

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.

⁸ A recently opened center housing several social service agencies including the Family Resource Center, several programs administered through DHHS, and others.

Monitor Assessment (8/15/2021-2/14/2022)

Collaboration during Investigations

Work was completed on Action 2 in the final monitoring period of the Stipulated Supplemental Judgment. CWS provided raw data in the form of case review templates filled out by each reviewer for each case to CCRP on 2/9/2022. Also provided in this monitoring period were spreadsheets collating case review results across different reviewing teams which formed the basis of CWS's analysis. These outcomes were summarized into dashboards and shared with relevant stakeholders within CWS, CCRP, Evident Change, and Tribal collaborators on 2/14/2022. In consultation with Evident Change, CWS chose an appropriate sampling strategy; the scope, timing, and sample size are consistent with assessing the stipulations of the Judgment. Case reviews determined that investigating social workers requested a joint client contact with the Tribe in 96% of cases.

CCRP verified the above actions through reviewing raw data provided by CWS, replicating elements of the methodology to confirm same result, and observing several meetings in which reviewers discussed their assessments and surfaced any outstanding issues (including assessing for inter-rater reliability and checking the wording of Tribal collaboration checklist questions). In addition to fulfilling the technical requirements of the Judgment, CCRP has observed and documented further developments which while occurring outside of the monitoring period, are encouragingly indicative that Humboldt County CWS is mainstreaming case review practice into ongoing CQI work.

Progress Update

CWS & Evident Change utilized the Investigation- Supervisor Tribal Collaboration Checklist tool focusing on Question 4 for its direct relevance to the areas in the Stipulated Supplemental Judgment:

Question 4: Did the investigating social worker request a joint client contact with the Tribe?

The case review process carried out and verified by CCRP is:

- 1. Timing: As in sampling strategy for the Intake portion of Tribal Collaboration case reviews, CWS elected, with Evident Change's guidance, to use the full population of ICWA investigations closed in one month- August 2021. Reviews were conducted in September and October, final results were compiled into dashboards and circulated at the end of the monitoring period, 2/14/2022.
- 2. Scope: All investigations closed in August were reviewed. Reviewers read case narratives for information pertaining to Question 4 and arrived at a determination whether the conditions of the question were met or not.
- 3. Sample Size: 26 ICWA investigations were closed in August, forming the initial sample. Five of these cases were later discovered to be non-ICWA and were removed from the sample, making the total 21 cases.
- 4. All 21 cases were reviewed by CWS CQI. The ICWA program manager and staff from Evident Change each reviewed a subset of five cases for comparison.
- 5. The outcome of the five comparative case reviews were that all reviewers found that conditions were met for Question Four, in all the cases. Across the full sample, 96% of investigations were found to have logged a contact request with a Tribal social worker.

Case review analysis and results for reviews conducted with Intake- Supervisor Tribal Collaboration Checklist are reported on above under Area 2.

<u>Issue 7. Tracking/Reporting Contacts with Tribal Representatives</u>

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 (8/15/2021-2/14/2022)

CWS has completed Actions 3, 4 & 5. CWS policy and procedures direct staff to document all contacts made with the family in CWS/CMS. Unlike the MHST and CFT corrective actions that speak to consistent use of CWS/CMS for documentation purposes, there are no standard reports available in SafeMeasures to measure timely entry of contracts in CWS/CMS. CWS continues to use a business intelligence tool to create a custom report with this information. The generation of this report was demonstrated step-by-step for CCRP for verification purposes. The custom report queries CWS/CMS for contact names associated with Tribes' Social Services employees and generates information about the frequency of contacts with Tribal representatives.

This is another area of the Judgment where information gained from completion of the corrective action has surfaced data that should inform future CQI efforts. Data gathered during the completion of the corrective actions suggests room for improvement and the need for additional assessment activities that provide context to the complexity of collaborative joint contacts. Information shared with CCRP during the Tribe input session included concerns about whether all contacts are documented, the accuracy of the information entered, and the timeliness of entry into CWS/CMS. All counties in California would be better served by some standardized reporting tools to allow CWS departments to quickly and efficiently run reports that allow them to accurately assess their performance in areas related to Tribal collaboration.

CCRP notes that input from Tribal representatives emphasized the importance of joint contacts, so that the Tribal social worker can see what is going on first-hand. The immediacy needs of some investigation contacts requires both CWS and Tribal Social Services to be able to respond

jointly within time frames indicated by policy. As surfaced in discussions over case review results with Tribal partners, there isn't a mutually agreed upon threshold for the metrics which CWS uses to track collaboration. Tribal partners view contact at critical points during the initial referral and case process as an issue area where failure to adhere to policy should not be tolerated by supervisors, while CWS is pursuing improvement but has concerns that 100% compliance will take additional time and adequate staffing.

While CWS and the Tribes differ in their opinions of acceptable thresholds for giving notice to the relevant collaborator within 24 hours, both parties agree that more work needs to be done to improve performance on contact at intake, which was successfully carried out in only 77% of cases, per case review results. Case review results from the investigations tool suggest that the CWS investigating social worker requested and documented a joint client contact with the Tribe in 95% of cases.

Progress Update

ICWA Joint unit program meetings are held once a month and ICWA supervisory staff have coached and trained staff on the importance of documenting joint contact with Tribes on ICWA cases. Topics covered include:

- Creating collateral notebooks in CWS/CMS for Tribal partners
- Documenting all conversations with Tribal partners into CWS/CMS
- Ensuring contacts are entered into CWS/CMS in a timely manner

In addition to the training, resources, and oversight provided by the ICWA program supervisory staff, 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 representatives 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.

Starting in January 2022, data presented in the dashboard was updated to include only investigations that have been closed.

The chart below reflects the proportion of investigations that included joint contacts with a representative from the Tribe present when CWS met with the family as documented in CWS/CMS. The chart is directly pulled from the CWS CQI data dashboard reference above.

Figure 8. Percentage of Joint Contacts with a Tribal Representative

Month	Percentage	N
August 2021	26%	61
September 2021	21%	68
October 2021	28%	94
November 2021	19%	73

December 2021	20%	55
January 2022	32%	19
February 2022	15%	13

Data Source: CWS/CMS, August 2021-February 2022

Case reviews conducted to assess Tribal collaboration during intake and investigations provided better contextual information to understand the conditions under which Tribal contacts were and were not carried out and documented per policy and procedure.

As indicated in Figure 8 and in the results of those reviews, while new protocols and tools have been developed to assist the department in coming into compliance with policy and procedure on Tribal contacts, there are still documented instances where contacts are not being made or made in a timely manner. The perception of Tribal collaborators continues to be that contact is not made frequently enough and what contacts do occur continue to be under documented. Within the ICWA case review samples there were several instances of this. These included cases where contacts were not made or not documented and it is impossible, in CWS/CMS, to know whether it is the latter or the former, and other instances where contacts were documented but collaboration was weak- in the assessment of one reviewer "documentation that the social worker spoke to the Yurok social worker and *told* them what was happening vs. engaging in collaborative efforts..."

These kinds of qualitative assessments reinforce the importance of using case reviews as a quality improvement tool. Mining CWS/CMS for information pertaining to Tribal contacts policy does not generate enough information or practicable insights for improving performance in the same manner that case reviews can. In feedback provided to the monitor, Tribal collaborators also noted that they used to conduct case reviews together with CWS and found value in this; this joint review process would require considerable resources from both the Tribes and CWS.

Of relevance to joint contacts, CWS has developed a custom tool to facilitate better communication with Tribal partners. The tool bolsters two particular aspects of shared work between Tribes and CWS. First, it ensures that all social workers are contacting Tribes using the preferred methods of communication, generally kept current on dashboards received from the Tribes but which are subject to change. Any updates would be made within the application. Individual social workers who may have missed changes will not make a contact in error so long as they use the cross-reporting tool. Additionally, the application tracks contacts and documents that have been sent throughout the case history so workers can track these steps more easily and

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⁹ For context purpose it is useful to remember that the results of the case reviews, which looked at all ICWA referrals and cases for the month of August, found that tribal contact policy was successfully carried out and documented in 77% of referrals being transferred for investigation, while collaboration during investigations and proper documentation therein occurred in only 36% of cases.

make sure shared documentation is complete. The application is an example of additional efforts taken by CWS to improve cross-reporting, an important component of Tribal collaboration.

At the time of writing the application is now ready to be launched. Test emails have been sent to all but one Tribe, who requested the test occur at a later date. At least one Tribe indicated that the test email worked as it should. CWS CQI notes that between their revised protocols and procedures, development of new tribal collaboration guidance and tools, and the creation of the application, Humboldt County is now pushing practice forward when it comes to collaborating with Tribal partners amongst California counties. From conversations with other departments, they believe the application could add value beyond Humboldt County as well.

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 (8/15/2021-2/14/2022)

CWS has provided documentation and information to CCRP that demonstrates good-faith efforts to maintain adequate staffing levels. CCRP notes, and CWS acknowledges that, while the department continues to struggle with understaffing, progress has been made in closing staffing deficits in key positions and departments, and efforts to improve both hiring and retention of staff were consistent throughout the monitoring period. Ongoing efforts to maintain staffing levels comprise multiple strategies including prioritizing social worker recruitment, maintaining a career pipeline by cooperating with local higher education institutions in recruiting interns, providing coaching to develop mentorship and management skills, helping staff cope with stress and burnout by contracting a firm specializing in mindfulness coaching, promoting internally, and creating more opportunities for staff to access training and continuing education.

CWS is currently contracted with UC Davis for continued technical and capacity building support on workforce development and staffing. Based on the investments made in this area over the course of the monitoring period and contractual commitments to take the work forward, obligations under this area can be considered fulfilled.

Progress Update

During this period CWS developed a New Social Worker experience checklist, aimed at ensuring that new hires have experienced and had a chance to demonstrate skill and understanding in some key activities within the first three months of employment. Social workers will have heightened access to mentorship as they work through the experiential checklist, working on skills such as conducting CFTs, writing court reports, warm handoffs, and more. Over the course of winter, the workforce development program manager and her unit worked towards creating a cadre of coaches who can be available to help staff with specific skills and issues. This included identifying staff who had completed coaching training, assessing their skill level and areas of expertise, and assembling a group of "Coaching Champions". This working group will meet to decide on a good coaching framework for Humboldt County, how to tailor approaches to

different staff positions across the organization, and (prospectively) identify how to get additional resources/fill knowledge gaps on coaching as necessary.

Currently the department is looking into how other counties track supervision hours, with the intention of identifying best practice and if needed, creating an updated Policy and Procedure to ensure that staff are accessing supervision hours bi-weekly. CWS reports that they have a 103 social worker allocation across all departments, of which 70 positions are currently filled resulting in 32% of the allocation being vacant. Twenty-eight percent (28%) of the 208 positions allocated in CWS are currently vacant.

Overview of Recruitment Efforts:

August/September: Seven interns began with Cal Poly Humboldt, four of which are current social workers in the department. One new Social Worker IV started from the May recruitment.

October/November: Office Assistant for Workforce Development begins work. Recruitment opens for an additional office assistant, Social Workers I/II. Six Social Worker I positions filled.

December/January: Eight Social Worker III positions accepted, all internal promotions. Three youth support specialists begin work. Two Social Worker II positions interviewed. Trainings were held for new hires on the CFT process.

Beyond: Internal promotions into Social Worker I. In February three social service aides were promoted into Social Work I positions. In a major development, a continuous recruitment for challenging positions to keep staffed, Social Worker IV, was approved and opened.

In addition to these recruitment efforts, the department continued to meet with the Kyer Group and hosted several mindfulness workshops open with all staff. They approved additional sessions with the consultants to work with staff in small groups. "Working With and Across Difference" framework continues to be used with the goal of challenging unconscious bias and creating a more equitable and accessible working environment at Humboldt CWS.

Work with UC Davis continued on their workforce development plan, with monthly check-ins between the collaborators and progress on the plan itself. As detailed under Tribal collaboration efforts, Humboldt County sent ten staff members to the CDSS funded training to become ICWA specialists. Six successfully completed all program requirements and became certified. CWS's ICWA program manager has inquired about further trainings in 2022; they are being planned but dates have not been confirmed at the time of writing.

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 (8/15/2021-2/14/2022)

CWS has fulfilled the technical requirements of the Judgment by completing and testing the CPRG. At the close of the second monitoring period Evident Change was compiling user data from the soft launch of the guide to troubleshoot any outstanding issues prior to a version update (launched March 4, 2022). CWS developed an RFP for a contracting agency to facilitate implementation and ongoing sustainability of the CPRG, and prepared data agreements between CWS and Evident Change. The formulation of these contracts is evidence of intent to continue engaging with the CPRG on an "ongoing basis", though CCRP notes that executed contracts and a full launch of the guide is still underway.

Progress Update

The substantive work on the CPRG in this period focused on incorporating final pieces of community feedback into the guide design, and planning infrastructure for its continued maintenance and use. CCRP observed both working group sessions and one-on-one meetings between CWS and Evident Change as they worked together to finalize the Child Protection Reporting Guide (CPRG). Initially taking place every other week, these lessened in frequency during the second monitoring period wherein Evident Change was primarily responsible for coding edits to incorporate community feedback and finalize the guide, its online platform, and data agreements to manage this infrastructure moving forward.

Towards these goals, Evident Change and CWS finalized training materials including E-learning modules, site demo/navigation guidance, and trainers' guide and PowerPoint materials. The department also thought through different strategies for providing institutional support to the guide- including working groups and steering committees and scanning existing community infrastructure for alignment with the Guide's purpose and goals that can sustainably support the work into the future. These were elaborated in a work plan, created with Evident Change that charts a course for implementing the Guide from January 2022 through the end of the year.

In conversations with Evident Change, and after examining CPRG practice in other jurisdictions, CWS noted that the vast majority do not host a CPRG site themselves. It is more common for that work to be housed within a prevention-based agency or other community partner. Given the agency's limited capacity, they have decided to pursue this strategy and formulated a Request for Proposals which is scheduled to be released in the summer of 2022. The RFP solicits proposals from agencies who would be contracted for implementation, on-going management of the Guide, outreach, distribution of informational resources and training users and trainers. Evident Change and CWS have also created a data sharing agreement between the two agencies which clarifies their roles and responsibilities with respect to the data generated by the Guide.

For the Guide itself, several updates were made based on community feedback, and incorporated into the latest version of the guide which was released on March 4, 2022. This included pop ups directing users to more training and guidance materials, and language edits to improve clarity for users moving through the decision tree. Additionally, staff at Evident Change helped draft a Theory of Change framework to aid the community in understanding the CPRG's vision. The theory of change speaks directly to some of the contentions that arose during the launch of the

project, over the tradeoffs that might be incurred in trying to improve the quality of reporting. The framework defines the problems the CPRG solves for, across three stakeholder groups: reporters, families, and CWS staff. It then defines how practice and outcomes will be improved for each group.

VI. Summary of Tribal & Community Partner Feedback

CCRP solicited and received input from a variety of Tribal and community partners during the monitoring period for the Stipulated Supplemental Judgment. As much of the Judgment's monitoring relied on administrative data which external stakeholders consider to be self-reporting on the part of CWS, CCRP believes it important to include community perspectives here.

It was also expressed to CCRP that, at least for some of the Tribes, they did not wish for the monitor to speak on their behalf. CCRP agrees that it is not appropriate to try and represent the individual perspective of each Tribe, nor is it appropriate to assume that one perspective is shared by all Tribal representatives. The observations below come from meetings with multiple Tribal representatives and represent the themes that emerged repeatedly over the course of the monitoring period.

Building and maintaining collaboration is a process that takes time and requires ongoing attention. Tribal social workers want meaningful collaboration with CWS. While CWS has made efforts to respond to Tribes' concerns and to engage Tribes in system change work, multiple Tribes' Social Services Directors continue to express that collaboration is not happening at a level that meets their expectations. While they are talking directly to CWS about their concerns and frustrations, there remains a disconnect between these substantive and meaningful efforts to engage and collaborate and the lived experience of Tribes who see families and children in their communities continue to struggle with the impact of navigating the child welfare system.

Tribal collaborators expressed a desire for better real-time data that matches with day-to-day experiences of Tribal staff working with CWS. Tribal social workers report disconcerting instances of families and Tribal social workers being misquoted in court documents, reports of contacts taking place that were not found on Tribal call logs and other digital records, and important information that they have provided during contacts not being entered into the system and work having to be re-done. There is a sense, shared by Tribal Social Services Directors, that inconsistencies and other "misses" on the part of CWS would go unaddressed if they weren't vigilantly monitoring contacts and other documentation. CCRP was not positioned to verify this information, as information not entered or mis-entered cannot be assessed.

Measuring meaningful collaboration remains a challenge. Tribes expressed concern that "checking boxes on a list" is not meaningful collaboration. Standardized tools and reports are not available to CWS to measure and track meaningful collaboration, nor is there an operational definition of what constitutes good faith, quality collaboration. Case reviews can add substantive context and information to measure the frequency and type of contact with Tribes, but they are resource intensive and ideally, would be joint reviews conducted by both CWS and the Tribes. Resources are stretched thin on both sides which make this joint in-depth review process difficult.

Other issues which have been raised include:

- Many Tribal social workers have existing knowledge of the families, issues, and behaviors that are the subject of CWS investigation. They want to be empowered as collaborators both as a matter of policy but also to generate better outcomes for Tribal families. Tribes feel a sense of urgency around cases involving their children, and some feel that sense of urgency is not shared by CWS. The safety of children is the top priority of both CWS and the Tribes & Rancherias.
- ICWA cases require well-trained culturally informed CWS staff who can work collaboratively with the Tribe throughout the process. Changes in staffing and staff capacity at CWS and with the Tribes and Rancherias have an impact on efforts to collaborate.
- CWS has stated a commitment to improve Tribal collaboration in the county and welcomes more direction and guidance from the State on how to measure and track tribal collaboration in a way that is meaningful to the Tribes.

When situations arise where the Tribe and CWS do not agree on a decision, collaboration is very difficult. One Tribal representative characterized these as "power struggles" that appear to resolve in the County's favor. One Tribe that has an MOU in place with the county expressed that the MOU "really helps" and that it outlines how they can negotiate if they don't agree. As of the writing of this report, efforts are being made by the County and more Tribes to develop collaborative MOUs.

CWS maintains a schedule of standing meetings which attempt to bridge some of the communication gaps, provide space for feedback early and often, and promote better understanding between collaborators. CWS CQI provided the following meeting schedule with Tribal Services which they say they are maintaining as of April 2022 (see Figure 9).

Figure 9: Weekly Meetings Addressing Tribal Collaboration

Meeting	Collaborators Present	Purpose	
ICWA program development planning	Tribal Social Services Directors, CWS Administration, Program managers and ICWA supervisors, OTA	ICWA program design and implementation	
Executive Meetings with Tribal Directors	CWS, Tribal Social Services Staff	Discuss system issues, case related issues	
CDSS Office of Tribal Affairs	OTA Northern CA liaison, CWS ICWA program manager	System improvement on Tribal engagement and relations	
ICWA Ongoing unit meetings	ICWA(H)(F)(B) staff	Training, coordination, team building	
ICWA program meeting	ICWA program staff, Program manager, Cultural coaches, DD	Training, coordination, team building	

ICWA Joint	Various, ICWA staff	Cultural coach facilitated
coaching		group activities

In addition to these meetings, CWS reports additional meetings taking place weekly to support coaching activities in different units and coordinate CWS engagement with the ICWA Friday meetings and other administrative support to Tribal Collaboration activities. There are additional standing meetings that happen monthly, and those that occur on demand depending on the needs of outside collaborators including UIHS.

The Office of the Ombudsperson is one of the mechanisms Tribal social workers have at their disposal to get resolution for ongoing issues with CWS. From March 2021 through January 2022, 31 complaints were filed with the Ombudsperson from three Tribal nations. The complaints fall into four general categories:

- 1. Underperformance- Observations of CWS social workers not following established procedures during investigations, submitting necessary paperwork, or using decision-making protocols to ensure good outcomes that are compliant with CWS mandate, policies and procedures, and best practice.
- 2. Lack of adherence to contact policies- Tribes reporting not being contacted in a timely fashion for an ICWA case or not being informed of visits scheduled to Tribal families and children.
- 3. Delayed investigations- instances of open investigations carrying forward several months, delayed adoptions and other court proceedings.
- 4. Poor collaboration- CWS social workers not receiving input or conducting decision-making processes together with Tribal collaborators, not communicating changes in decisions or outcomes, not engaging Tribal collaborators for insight and cases proceeding with insufficient information.

It is notable that Tribal representatives mentioned throughout their focus group sessions the metrics and measures that are meaningful to them, and concern that they were not encompassed by the terms of the Stipulated Supplemental Judgment. Among these were (average) number of days to close an investigation, which Tribal social workers noted had improved when the department cleared their case backlog but has now reversed some of its progress. Additionally, a core concern of Tribal collaborators was to understand how policies were being enforced by social worker supervisors at CWS. They note that many of these were subject to their input and review, which is appreciated but an empty gesture if staff are not held to the standards encompassed in those policies and other forms of guidance.

VII. Conclusions & Future Efforts

Over the course of CCRP's monitoring of the Stipulated Supplemental Judgment, conducted (albeit partially retroactively) from February 14, 2021, through February 14, 2022, Humboldt

 10 One respondent elaborated that the time to close an investigation had rarely lingered past 40 days, during better times.

County CWS has continuously taken measures to address specific items in the Judgment and also create sustainable processes for on-going quality improvement beyond the term of the Judgment. As monitor, CCRP would like to highlight the following developments as primary examples of the work completed under the auspices of the Judgment that show promise in deepening the department's responsiveness to issues arising in its caseload, strengthening collaboration with external stakeholders, and increasing accountability to its mandate and the community:

- Initiating case review processes outside of those required by the C-CFSR/ SIP process, and the Judgment.
- Engaging Child Welfare experts Evident Change to help build analytical capacity of staff with on-going technical assistance and contracting external capacity support to key program areas.
- Launching, evaluating, and refining strategies to improve communication with Tribal
 collaborators including through creation of a report card, strategic use of the standing
 ICWA roundtable meeting, complementing the quantitative strategies motivated by the
 judgment with qualitative reporting insights, creating a cross-reporting application to
 track communication during intake and investigations, and others. While not all of these
 strategies have resulted in improvement on key metrics, they demonstrate continuous
 quality improvement ethos at work.
- Continuing to monitor performance on key metrics pertaining to the Judgment, including the percent of open cases with a qualified CFT and MHST, beyond the monitoring period (ending February 14, 2022) and despite having surpassed California state averages in these areas.

The chief finding of this report is that CWS has completed all outstanding actions under all areas of the Stipulated Supplemental Judgment at the close of the second monitoring period, covering August 15, 2021 through February 14, 2022. Without diminishing the strength of this finding, CCRP would be remiss to not qualify a few areas where actions taken have fallen short of delivering desired outcomes:

- Not all contacts are currently being entered into the system. It seems unlikely that any
 department has held a 100% performance standard on this aspect of CWS practice. It has
 been at the department's discretion (with advice from collaborators) as to how to pursue
 improvement and set an acceptable standard knowing that flawless performance is not
 realistic.
- Performance on Tribal contacts is still not meeting the standard codified in the department's
 policy and procedure, or to Tribal collaborator's expectations. The department continues to
 develop tools and strategies to address this given the dearth of existing guidance, best
 practice, or practical solutions that exist in the community of practice to aid them.

Through conversations with external CWS collaborators and appointed child welfare expert Evident Change, CWS has coalesced a vision for the future in which CQI creates information flows that not only identify emerging issues for redress and enact responses, but also pushes practice towards excellence. Humboldt County CWS has used the opportunity of the Judgment to build considerable infrastructure as a foundation for this vision. Not only have many tools and

processes been customized to better fit the specific needs identified in the Judgment (SafeMeasures reports, CFTs surveys, processes for pulling data from CWS/CMS that speak to core concerns), but several entirely new tools have been developed for these purposes including cross reporting applications, Tribal Collaboration checklists and the CPRG.

This marks a period of considerable change for CWS, and there is a shared sense amongst staff and the community at large that the next phase is one in which new practices are deepened, formalized into ongoing operations, and made more sustainable for CWS if needed. CWS stakeholders, Tribal rightsholders, and the community have expressed the following as desirable to emphasize moving forward:

- Formalize processes for gathering community feedback, circulate it amongst relevant internal staff, and incorporate it into decision making. Create a schedule and timeline for this process (across all issue areas where it occurs) that is driven by community needs and works within CWS's existing structures and capacity. Work towards mutual understanding of when and how input is gathered and trust that it will be acted upon whenever possible. Build capacity to integrate qualitative data into CQI.
- Formalize processes for communicating performance to external partners and the community. Create a schedule and accessible products, set parameters for what will be reported out, how it will be conveyed and how often this will be done. Build on efforts such as the Community Task Force and "Report Card" which was circulated to Tribal collaborators and find a sustainable cadence for reporting which can forge a sense of transparency and accountability between CWS and the community at large.
- As the CQI program matures, formalize protocols for transitioning out of QIPs into on-going monitoring (KPIs or whatever vehicle is identified to track metrics from the QIP), revising and if need be, retiring metrics that no longer serve the department, or reflect areas of concern.
- Further articulate how case review practice will be conducted moving forward, staff that will be involved, and how capacity will be built around this competency. If possible, conduct joint reviews on ICWA cases with Tribal representatives.

Finally, it is evident that Humboldt County is hardly alone in its challenges regarding collaboration, staff capacity development, and other elements which are crucial to strong delivery of its mandate. There is a sense among the parties involved that there is learning and innovation to be gained through exchanges between California counties regarding practice in several issue areas of the Judgment, particularly Tribal collaboration. Given the resource constraints and immediacy of day-to-day service delivery, additional resources to support this work would likely benefit all California counties.

Appendix A. Overall Assessment- Attorney General Stipulated Supplemental Judgment

Monitoring Report #2: August 15, 2021-February 14, 2022

	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	Complete	Continue efforts to ensure			
	system, CWS/CMS, to document all mental health screenings and referrals		data integrity			
	made to County Mental Health for children in an open CWS case.					
2	CWS shall track and report mental health screening and referral data from	Complete	Continue efforts to run			
	CWS/CMS, including the number and proportion of children in an open CWS		daily and monthly reports			
	case who have had a timely screening and referral to mental health services.		using SafeMeasures			
3	Compliance reports relating to CWS' screenings and referrals to County	Complete	Continue to update and			
	Mental Health shall be provided to CWS Administration on a monthly basis.		share QIP on a monthly			
			basis with Admin & staff			
4	CWS shall establish an annual goal for the proportion of timely screening and	Complete	Continue to update and			
	referrals made to mental health.		share QIP			
5	If CWS falls below the established goal for two consecutive months, CWS	Not	Continue to implement QIP			
	shall initiate a quality improvement plan to increase compliance to the	Applicable	strategies and monitor			
	established goal.		progress			
A	rea 2. Implementation of New Emergency Response System and Revision of	f Policies and P	rocedures 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,	Complete	Continue efforts to ensure			
	including those involving children in out-of-home care. All reports shall		data integrity			
	continue to require electronic supervisor approval of the determined response					
	in CWS/CMS.					

2	In consultation with the child welfare expert, the California SDM Intake	Complete	Discuss results of case
	Supervisory Referral Reading fidelity tool shall be used to review a sample of	compi cio	reviews with Tribal
	reports received that involved children in an open case or referral to		Collaborators and gather
	determine whether an appropriate response decision was made per		feedback
	policy. The scope, timing, and sample size of the reviews shall be		Tecasack
	determined in consultation with the child welfare expert. Reviews involving		Mainstream SDM case
	reports that include Native American children will be conducted by CWS'		review practice into
	Indian Child Welfare Act (ICWA) Program. Reviews involving all other		ongoing CQI work
	reports will be conducted by CWS' Continuous Quality Improvement (CQI)		
	Program. Case review results and underlying supporting data shall be		Provide training to
	provided to the child welfare expert and the compliance monitor for		screeners on thorough
	verification. Aggregated results from the reviews shall be provided to CWS		documentation Provide
	Administration and the Tribes, as appropriate, to inform CQI strategic		training to SWs on
	planning.		duplicate reports, overrides,
			connecting elements of the
			narratives to SDM
			definitions.
A	rea 2. Implementation of New Emergency Response System and Revision of	Policies and Pr	ocedures 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	Complete	Continue to use and refine
	and investigation fidelity tool that measures CWS' adherence to its policy	_	fidelity tools to measure
	that tribes are to be routinely contacted, as required, to contribute to		adherence to policy
	evaluations during intake and investigations.		
2	In consultation with the child welfare expert, a review shall be conducted of a	Complete	Discuss results of case
	sample of reports received involving Native American children utilizing the	_	reviews with Tribal
	above referenced fidelity tool. The scope, timing, and sample size of the		Collaborators and gather
	reviews shall be determined in consultation with the child welfare expert.		feedback
			Donalds and a los Austri
			Provide on-going training to staff on use of tools and
			proper documentation of contacts
			contacts

		T	Τ
			Mainstream Tribal checklist case reviews into ongoing CQI work
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.	Complete	Continue routine case reviews
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	Complete	Discuss results of case reviews with Tribal Collaborators and gather feedback Provide on-going training to staff on use of tools and proper documentation.
A	rea 2. Implementation of New Emergency Response System and Revision of		ocedures by Defendants
	Issue 4: Child & Family Team Meetin	gs	
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.	Complete	Continue to monitor
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.	Complete	Continue to administer survey or develop other methods to seek feedback from CFT participants
	Area 3. Tribal Collaboration		
	Issue 5: Development of Fidelity Too		
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.	Complete	Discuss results of case reviews with Tribal Collaborators and gather feedback Provide on-going training to staff on proper documentation of contacts Mainstream Tribal checklist case reviews into ongoing CQI work
	Area 3. Tribal Collaboration Issue 7: Tracking/Reporting Contacts with Tribal I	Representative	s
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.	Complete	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

CBH (Humboldt County Dept. of Health and Human Services) County Behavioral 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