



## A Review of Safety Assessment Guidance and Practice in the Oklahoma Department of Human Services

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## **I. Introduction**

Casey Family Programs was requested by the Oklahoma Department of Human Services (OKDHS) to conduct a review of the tools, training materials, and guidance memoranda related to the assessment of child safety and to provide a report of findings with recommendations for changes, if indicated. The request stemmed from child deaths occurring in late 2010 that raised questions concerning legislation passed in 2009 (HB 1734) establishing "imminent safety threat" as the standard for removing children from their families in child protection investigations. In creating that standard, the 2009 legislation substantially narrowed the conditions under which children could be taken into protective custody, requiring officials to determine that the threat to a child is so severe that "in the very near future and without the intervention of another person, a child would likely or in all probability sustain severe or permanent disability or injury, illness or death." Prior law required only that child protection investigators, law enforcement officers, and courts show that a child's surroundings were a danger to his or her welfare.

The provisions of the 2009 legislation are incorporated into the OKDHS practice model which began development in 2008 and has now achieved nearly full-scale implementation. This model relies heavily on policies and tools that guide caseworkers and casework supervisors in assessing child safety and family functioning and in engaging families to make changes that allow children to be maintained safety in their own homes.

## **II. Methodology**

The review reported in this document included study of the 2009 legislation, safety assessment tools, documents used in the guidance and training of OKDHS child protection staff, and interviews with staff at the front line, middle management, and executive management levels of the organization.

### **A. Documents**

The following documents were provided for review by OKDHS:

- Oklahoma Practice Model Guide — Provides operational guidance for the seven OKDHS Practice Standards.
- Policy Transmittal 10-54 of December 7, 2010 — Outlines the policy changes made to comply with statutes, including changes made to reflect the criterion of child safety.
- CWS Memo 9-11 — Provides direction for the assessment of families to be used as temporary placement resources in out-of-home safety plans.
- Safety Planning Questions and Answers — Provides answers developed in response to staff questions concerning CWS Memo 9-11.
- Proposed revisions to OAC 340:75-13-61 — Revises sections of CPS policy dealing with intake screening, assessments and investigations.
- Safety Prompter Questions — A guide for intake personnel interviewing reporters. It includes categories of inquiry concerning types of maltreatment and conditions in the home, with specific questions to elicit detailed

information about each. These categories and questions are drawn from the Practice Model Guide.

- Assessment of Child Safety (AOCS) — Tool and instructions for assessing child safety at intake and periodically during the casework process.
- Critical Thinking for Safety Decision Making — A guide for a two-day training developed in 2009 by ACTION for Child Protection.
- Child Protective Services Training for County Directors — A seventeen slide PowerPoint presentation that outlines the CPS investigation and case disposition processes.
- OKDHS Child Welfare CPS New Supervisor Training 2010 — A thirty-three slide PowerPoint presentation.
- The Safety Decision — a fourteen page article published by ACTION for Child Protection which defines the concepts of child safety and of imminent and present danger, explains the safety assessment process and its purpose, the finding of safe or unsafe and considerations in mitigating danger.

A Casey Family Programs document reviewing key points of OK HB 1734 also served as a reference document for consultants conducting the review as did a copy of a 2009 performance audit conducted by Hornby Zeller Associates.

## B. Interviews

Casey Family Programs consultants interviewed a total of 15 OKDHS staff over a period of two days. These interviewees represented positions at all levels of child welfare practice within the organization. They included Program Managers and Field Service Liaisons in the state central office, area and county directors, supervisors, and caseworkers. Interviewees were selected by the CPS Program Manager in the central office or, in the case of those in county offices, by a county or area director. All were assured at the beginning of the interview that their names would not be included in this report nor would their comments be connected directly with their positions in a way that might identify them as individuals. Interviews were flexible to accommodate the individual's position and allow for following up on key points raised in their comments; however, all centered on the following questions:

1. How has the legislation of 2009 which established imminent safety threat as the criteria for removal of a child from his or her home impacted child protection practice in Oklahoma?
2. Do you believe that implementation of the imminent safety threat standard has compromised the safety of children? Why or why not?
3. What do you consider the strengths of the safety assessment process?
4. What concerns do you have about the safety assessment process?
5. What do you consider the strengths of the safety planning process?
6. What concerns do you have about practices related to safety planning?

7. What is your assessment of staff knowledge, skills, and capacity to carry out the safety and assessment and planning processes called for in the Practice Model Guide?
8. What concerns, if any, do you have about the implementation of the safety assessment and planning processes?

### III. Findings

#### A. Documents Review

The documents provided for this review were generally found to be in accord with sound practice in child protective services and the assessment of child safety and risk. Each is addressed individually below.

##### 1. *The Oklahoma Practice Model Guide*

*The Practice Model Guide* provides foundational support and operational direction for the seven OKDHS practice standards. It addresses the intake and screening of referrals, assessments of child safety and family functioning both initially and ongoing, safety planning, behaviorally based case planning, and permanency options. It also includes case consultation and planning approaches such as working with multidisciplinary teams, family team meetings, and concurrent planning. It defines the concepts of child safety as well as present and imminent danger.

The *Guide* calls for a balance between detailed prescription of practice and flexibility that allows caseworkers and supervisors to fit their actions to the individual needs of a case situation. It acknowledges that caseworkers need clinical skills (in listening, interviewing, and providing guidance and oversight) as well as assessment tools that help them to make sound decisions.

Overall, *The Practice Model Guide* is a comprehensive document that addresses the scope of child protection and child welfare practice. It contains substantial explanatory detail and examples. In relation to safety assessment, the *Guide* provides definitions of *safe*, *present danger*, *impending danger*, and includes a detailed discussion of six factors that must be considered in assessing safety. These factors are included in the form of questions in the *Assessment of Child Safety* document and will be described in greater detail in the reporting of that document below. The *Guide* also defines and discusses both in home and out-of-home safety plans, cautions against common pitfalls in the creation of safety plans such as including parent promises or the longer range impact of services to ensure child safety, and differentiates between safety planning and individualized service plans.

While the reviewers found the *Guide* to be well written, generally consistent with sound child welfare practice, and detailed in its descriptions and definitions of practice principles, some concerns were noted. First, although it includes reference to child vulnerability as a factor in safety assessment and

planning, the *Guide* might be more detailed in its discussion of exactly how vulnerability is incorporated into decision making. In what specific ways, for example, might the degree of vulnerability aggravate or mitigate the safe vs. unsafe decision? Specific mention is made of children three years of age or younger as being especially vulnerable; how might vulnerability be assessed as a factor in determining the safety of children in other age groups? Pre-teens, and adolescents, for example, although usually able to meet their own immediate physical needs, might be more vulnerable to various types of exploitation that could place them in danger.

A second concern relates to the fact that the Practice Model Guide calls for situations in which a child is at risk of future harm but not currently unsafe to be referred to a community agency. It does not address the management of situations in which there are multiple or very significant risk factors and community resources to address them are either lacking or known to be inadequate.

## 2. *Selected Child Protection Policy and Memoranda*

This policy review focused on the changes made in connection with the 2009 legislation that established imminent danger as the criteria for removal of children from their families. Policy and policy-related documents reviewed included:

- Policy Transmittal 10-54;
- CWS Memo 9-11;
- Safety Planning Q & A;
- Proposed revisions to OAC 340:75-13-61.

Overall, the policy documents reviewed appeared detailed and internally consistent. It was noted that, while the legal threshold for removal is now “imminent safety threat,” proposed policy (340:75-3-7.4) does call for a comprehensive investigation of child maltreatment reports, stating “The CPS process includes identifying child safety threats, incident-based fact-finding, as well as identifying the presence or absence of maltreatment and the circumstances surrounding the reported allegations.”

Policy provides a process for requesting immediate custody if a child is found to be in danger and his or her safety cannot be assured. It also provides for requests for court intervention when families refuse voluntary services deemed necessary for child safety. Section 340:75-3-13, *Completion of Child Protective Services Assessment or Investigation* in section (a) (3) states “When the family refuses voluntary services or does not access services directly related to the safety of the child, and it is determined by OKDHS that the child’s surroundings endanger the health, safety, or welfare of the child, OKDHS may recommend the child be placed in protective or emergency custody, or that a petition be filed.”

Proposed policy 340:75-13-61 raised some concern in that it provides that investigations “may include interviews with the parents of the child or any

other person responsible for the health, safety, or welfare of the child.” It is not clear why conducting interviews with parents or other caregivers should be optional, particularly since the following section of policy prescribes a detailed process for informing the parents or caregivers of the investigation activities and, upon its completion, of its findings. Policy section 340:75-3-7.4 also states that, “during the assessment or investigation process, the child welfare worker gathers information from family members or other persons.”

It is understood that other sections of child protection policy were not included in this review because they are in various stages of revision and/or rulemaking. Thus the extent to which such changes might address the assessment of safety and safety planning is unknown to these reviewers.

### 3. *Assessment of Child Safety (AOC)*

The AOC is an eleven page document containing eight sections. Section I includes definitions of *safe*, *unsafe*, *present danger*, and *impending danger*, and notes that children under the age of three years and those with diminished physical or mental capacity should be considered more vulnerable.

The safety assessment process is contained in sections II through V. Section II calls for delineation of an immediate plan for protection when present danger is identified; Section III requires the caseworker to respond to six key questions about family life that provide the information necessary to determine child safety. These pertain to (1) the extent of the child’s maltreatment; (2) the circumstances surrounding the maltreatment; (3) the functioning (i.e., behaviors, capacity, emotional and physical factors, vulnerability) of children in the home; (4) parental disciplinary practices; (5) general parenting; and (6) functioning (i.e., mental and physical health, substance use, daily management) of the adult caregivers in the home. Section IV contains eleven multiple choice questions concerning the existence of specific safety threats. If one of more of the eleven factors in Section IV exists, the child is deemed unsafe. Section V requires the caseworker to state the safety decision.

Section VI includes a series of protective factors and must be completed if the child is found to be unsafe. Section VII, the safety response, requires the identification of any resources available in the family and community that can be mobilized to ensure child safety and includes five specific steps plus one “other” step that can be taken. Section VIII, calls for a detailed description of the plan to ensure the child’s safety and must be signed and dated by the caseworker and supervisor.

The safety assessment instrument used by OKDHS is based on the ACTION for Child Protection model which is well recognized in child protection practice in the United States and, for the most part, compares favorably with other safety assessment tools used in child protective services. Nonetheless, the reviewers did have some questions and concerns related to the instrument.

First, the same comment pertaining to vulnerability and how that is used in the decision making equation made about *The Practice Model Guide* also applies with the safety assessment tool. Additionally, the guidance for the identification of *present danger* is unclear, based only on an open-ended question (“The present danger was/is...”). The directions state that “through the analysis of answers to the six questions, one should assess the presence or absence of the following safety factors” (the eleven “Safety Threats”). The six questions are designed to identify impending danger across the thirty-day assessment period, whereas the eleven safety threats signal present danger. The form might be clearer if the “Safety Threats” were re-labeled “Signs of Present Danger” and not tied to the six questions.

The instrument calls for consideration of protective capacities and child vulnerability, but directs that they be considered only in the safety response, not in the actual determination of *safe* or *unsafe*, although they are relevant. It is not clear why safety threats are not considered in concert with mitigating factors in making this decision.

Finally, the tool uses three different terms for the safety interventions: *safety response*, *safety plan*, and *voluntary safety plan*. Reviewers have some concern about whether these terms are clearly understood and differentiated by staff.

#### 4. *Training and related documents*

Documents addressed in this category include:

- *Critical Thinking for Safety Decision Making* (ACTION for Child Protection, 2009, facilitator’s guide);
- *Child Protective Services Training for County Directors* (PowerPoint with notes);
- *OKDHS Child Welfare CPS New Supervisor Training 2010* (PowerPoint with notes); and
- *The Safety Decision* (ACTION for Child Protection, Inc.)

The *Critical Thinking* training is designed for supervisors. It was developed to be delivered in three days, but has been condensed to two. It contains the following main topics:

- Day One
  - Introducing, Defining and Practicing Critical Thinking
  - Information Gathering and Assessment
  - Fallacies/Errors in Thinking
  - Safety Planning
  - Supervisors and Critical Thinking
- Day Two
  - Applying What We Have Learned So Far

- Critical Thinking and Ongoing CPS
- Setting the Stage — Creating a Critical Thinking Environment Within Your Team

Overall, this training is sound. It includes informational handouts, interactive exercises based on case examples, and time for discussion and clarification. The same concern regarding the indicators of safety threats described in the Assessment of Child Safety also pertains to this training, as it references the six questions described above in the description of the Assessment of Child Safety as indicative of safety threats (page 13).

The *Child Protective Services for County Directors* PowerPoint appears to be an overview of CPS practice principles and processes designed for County Directors and delivered as part of the “County Directors Academy” training to provide them with a basic familiarity with child protection.

The *OKDHS Child Welfare CPS New Supervisor Training* covers intake screening, establishing priorities for the initiation of investigations, the use of “two-track” assignment with criteria for determining whether a report should be designated an assessment or an investigation, specific types of reports with special guidelines (e.g., reports of maltreatment in out-of-home settings, child death and near death), assessment of child safety, and safety planning.

Neither of the PowerPoint presentations described above raised specific concerns on the part of reviewers based on the information they contained. Despite the fact that these documents also contained presenters’ notes, they are, by their nature, sketchy. While the slides appeared to be appropriate in scope for the training topics and audience, it was not possible to draw a clear conclusion about the quality of the actual training.

*The Safety Decision* document focuses on safety assessment, but does include some incidental attention to safety planning. The discussion of safety assessment is based on review of multiple assessment tools and includes enumeration of safety threats, conditions for identifying a safety threat, and the purpose and objective of safety assessment.

This article did not in itself raise concerns; however, it seems in conflict with the directions in the current AOC, as it includes caregiver protective capacity and child vulnerability as factors to be considered in making the safety decision. As previously noted in the review of the AOC, that instrument instructs caseworkers to make the safety decision before consideration of those factors.

## B. Staff Interviews

All of the staff interviewed appeared thoughtful and deliberative in their responses and comments. Their work experience in OKDHS ranged from 3 to over 30 years with most having more than 10 years of experience. Individual interviews extended from 20 to 45 minutes.

An analysis of consultants' field notes from staff interviews suggested their logical grouping in the categories enumerated below.

*1. Impact of the "imminent danger" standard on Child Protection Practice*

Interviewees pointed out that enactment of the "imminent safety threat" criteria as mandated by legislation occurred concurrently with implementation of the OKDHS practice model. Thus their perceptions about the impact on practice reflect changes emanating from both of these sources.

Overall, staff interviewed did not view the imminent safety threat standard as having negatively impacted practice or compromised child safety. Interviewees repeatedly said that they viewed the move from an "incident based" system to one in which the focus is on actual harm and the existence of danger to the child as positive. The former system, as described by those interviewed, called for a substantiated finding if there was evidence that the incident reported had occurred, regardless of the circumstances or the degree of harm or potential harm to which the child was exposed. Investigative procedures and decision making were not geared to consideration of antecedent conditions, contributing factors, or underlying causes of incidents. This approach meant that child protection staff, in general, responded only to presenting aspects in each case without necessarily understanding factors that might cause a situation to escalate to greater harm or, conversely, suggest ways in which a child's safety could be more readily assured, perhaps with less intrusive intervention.

*2. Impact of the "imminent danger" standard on child safety*

Most interviewees expressed the opinion that a more narrow criteria for the removal of children was needed, as the broader one of a child's surroundings presenting a danger to his or her welfare resulted in some children being taken into OKDHS custody who could have been kept safely with their families. Some staff did, however, indicate that, while they viewed the changes positively overall, there are situations in which the imminent safety threat standard, as it is implemented in the OKDHS practice model, might result in potentially dangerous situations being overlooked or minimized. Although such cases are relatively few, there are some situations which include a number of very serious risk factors which could escalate into danger at any time despite their not constituting present or imminent danger as it is defined in the practice model.

Staff who mentioned concerns about high risk cases felt that they are without clear guidelines as to how they should be handled. While such families can be referred to the Family Centered Services (FCS) in-home program, not all families are cooperative and, in at least some jurisdictions (including Oklahoma County), there is said to be a reluctance on the part of district attorneys to file petitions when custody is not requested. Some interviewees also indicated that there are staff who lack the skills to fully engage families in voluntary services or who use an authoritative approach that presents a barrier to engagement.

Lacking clear guidelines about when to refer families at higher risk to FCS, some caseworkers and supervisors may choose not to do so, particularly if they believe the family will not voluntarily participate in services. Interviewees also pointed out that many FCS cases are closed without services being completed. In light of these concerns, some staff expressed the opinion that there is a need to return to consideration of some risk factors, particularly when families lack supports that can be mobilized to ensure that conditions do not deteriorate.

*3. Strengths and concerns about the process for assessing child safety*

Interviewees felt that the joint protocols with law enforcement required by the 2009 legislation have been helpful. Law enforcement officers can no longer unilaterally make the decision to remove a child; they must involve OKDHS staff in determining whether a child is in danger and in exploring alternatives to removal. Laws now provide for a 23-hour window during which a child taken into protective custody can be returned to his or her family without a court order. This allows for some children who initially appear to be in danger to be returned to their families without actually entering OKDHS custody if, upon further exploration, their safety can be ensured within their family.

Interview participants felt that the Assessment of Child Safety (AOC) tool calls for a comprehensive assessment of factors that impact child safety. In OK County, use of the instrument has been augmented with early team decision making for case planning resulting in better decisions.

Although the process is generally viewed positively, most interviewees acknowledged that it takes considerably more time than was required for the investigation process prior to institution of the practice model. This is the case even though the tool is now in the KIDS automated case record system and caseworkers are becoming more adept at using it. Although the assessment process is simply more time consuming, case documentation requirements are made more burdensome by the fact that there is considerable duplication between the AOC and the District Attorney's report that must be submitted on all investigations. One administrative level interviewee attributed the high turnover in her office directly to the large case backlog and the stress it places on staff.

Some staff indicated that, despite the improved quality of investigations and their appreciation of the positive qualities of the AOC, they still have concerns about the ability of some caseworkers to determine present or imminent danger. Additionally one of those interviewed voiced concerns regarding the requirements and process for documentation of contacts with collaterals in investigations, saying it is not clear to everyone just how this is to be done.

*4. Strengths and concerns about the use of safety plans to maintain children in their own homes or within their extended families*

Almost all interviewees expressed agreement with the concept of safety planning to maintain children in their own homes or within the extended family

and community. Most, however, indicated some level of concern related to the ability of caseworkers to create sound safety plans. As one interviewee remarked, "Safety plans are only as good as their monitoring and ours are not always monitored well." Several others expressed concern that caseworkers do not uniformly understand when and how to use safety plans.

Various interviewees questioned whether all front line caseworkers and supervisors had the knowledge and skills or applied the critical thinking necessary to consistently exercise good judgment in the crafting and application of safety plans, particularly those that are designed to protect a child in his or her own home. Some cited the high turnover rates and the fact that many supervisors are themselves relatively inexperienced.

5. *Staff skills, knowledge, and capacity to carry out safety assessment and planning in accordance with the practice model*

Overall, those interviewed felt that, while training on safety assessment and planning is improving, more is needed. Most agreed that training should emphasize skill building more than policy and that it should also include coaching and mentoring in order for caseworkers and supervisors to transfer classroom instruction into practice. Family engagement was mentioned as a particular area of skill building needed by many staff. Some administrators indicated that a shift to a skills emphasis is planned; however, it is uncertain whether there will be adequate resources to provide the intensive coaching and mentoring which are seen as essential adjuncts to class room training.

Several interviewees, especially those in the Oklahoma City area, pointed to high turnover as a concerning factor when questioned about staff skills and capacity. High turnover not only means that many cases are being handled by inexperienced caseworkers, but also that caseworkers may move into supervision with little experience. Inexperience and workload were cited by more than one interviewee as a factor negatively impacting supervisors' ability to provide the level of consultative, educative supervision that most caseworkers need. Staff who commented on supervisory workloads indicated that supervisor to caseworker ratios in their counties range from 1:5 to 1:9 and estimated that a ratio of 1:7 is most common. The Child Welfare League of America recommends a ratio of one supervisor to every five caseworkers<sup>1</sup>; the Council on Accreditation recommends that the supervisor to caseworker ratio not exceed one to eight and that, in determining the ratio consideration be given to the qualifications of the caseworker and supervisor, the complexity and intensity of services, and other agency responsibilities<sup>2</sup>.

It was also suggested that more follow through is needed in studying situations of serious child injuries and child deaths and using findings to inform policy and training for all child welfare staff. Currently, according to

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<sup>1</sup> Child Welfare Information Gateway; retrieved 3/30/11 from <http://www.childwelfare.gov/management/workforce/compendium/cwla.cfm>

<sup>2</sup> Council on Accreditation, 8<sup>th</sup> Edition Standards; retrieved 3/30/11 from [http://www.coastandards.org/standards.php?navView=public&core\\_id=21](http://www.coastandards.org/standards.php?navView=public&core_id=21)

interviewee reports, these incidents are investigated, but there is not a clearly defined and implemented process for using the learning from the investigation to inform changes in training and/or policy.

Finally, some interviewees expressed the view that, while safety assessment and planning has now been incorporated into training for new caseworkers, there is a need to give more attention to developing the skills of longer term employees. One suggestion to accomplish this was designation of a “practice model specialist” in each area who could work with all staff to identify learning needs and design approaches for skills development. Another was the design of additional user-friendly tools and guidances to support critical thinking and the recognition of signs of possible danger or very high risk.

#### *6. The implementation of the safety assessment and planning process*

Interviewees noted that implementation of the 2009 legislation occurred, to a large extent, concurrently with implementation of the OKDHS practice model. Thus responses regarding implementation tended to apply to both of these major sources of change.

It was repeatedly stated that changes in leadership in the Child and Family Services Division (CFSD) and time constraints placed by legislation did not allow for an orderly implementation process. This resulted in confusion on the part of staff and that, in turn, led to strained relationships between OKDHS and local law enforcement agencies in some localities. Policies not able to be revised and issued in time and are, in fact, still undergoing revision; the assessment tool was rolled out before it was tested and had to be changed several times after it was issued, and it was not originally in KIDS, Oklahoma’s automated data and electronic record keeping system. Additionally, the implementation process was characterized by some as “top down” and would have resulted in greater buy-in if there had been an effort to create local “experts” and “champions” around the state before full scale execution was expected.

Some interviewees in Oklahoma County mentioned that one impact of the implementation plan in that jurisdiction was loss of night shift staff. It was felt that this has been one factor contributing to the high turnover that the county has seen, as has the backlog that has grown due to the additional time required to conduct safety assessments.

Despite these concerns, however, almost all of those interviewed indicated that the implementation process is now proceeding much more smoothly. An important factor in improving trust and relationships between the program and field operations sections was the addition of new program staff in central office who are well respected, have recent field experience, and are generally seen as credible. In addition, now that the initial confusion has passed, the joint investigation protocols that clarify the respective roles of OKDHS staff and local law enforcement have smoothed relationships between the two entities, improving the quality of investigations.

#### **IV. Limitations of the Review**

This review was structured to explore the specific impact of legislative changes related to the threshold for removal of children from their families in child protection investigations. It did not include an overall review of CPS policy and practice. Further, no actual cases were reviewed and interviews, due to time constraints, were conducted only with individuals in the state central office and in OKDHS areas I and III.

OKDHS has undertaken a massive revision of child welfare policy over the past years and this is still underway. Policy development and review of new policy should be done with particular attention to its clarity of instruction to staff in the areas of safety assessment and planning.

#### **V. Summary and Recommendations**

As we have indicated in describing the components of this review, the documents provided and the information gleaned from interviews with OKDHS staff at multiple levels of the organization provided an impression that was, overall, favorable with regard to the changes in practice ensuing from the narrowed threshold for removal of children from their families and the portions of the practice model focusing on the determination of child safety.

None of the staff interviewed wanted to return to the “incident based” approach formerly used in OKDHS. The great majority felt that, overall, the change to the “imminent safety threat” criteria, as implemented in the current practice model, has resulted in CPS practice that provides a more appropriate level of intervention for most referred children and families. Likewise, the documents reviewed, for the most part, provide sound guidance in assessment and planning.

The concerns identified in this review are limited and center primarily on the following broad areas:

- The need for clarification of the instructions to staff regarding determination of child safety as indicated in the discussion of the safety assessment document and training.
- The need to address the increased workload created by implementation of the new requirements for safety assessment and planning.
- The need to provide mentoring, coaching, and other skills development activities for caseworkers and supervisors to enhance their assessment of child safety, their ability to create and monitor effective safety plans, and to engage families in voluntary services.
- The need to ensure uniform court practices in conformity with law and policy regarding oversight of families referred to Family Centered Services to address threats to child safety and situations of unmitigated high risk.
- The need to clarify and possibly expand practice model criteria for the disposition of cases in which significant risk factors, accompanied by a lack of mitigating factors, are identified even in the absence of child danger.

Specific recommendations to address these three areas include the following:

1. Consider revisions to the safety assessment tool to include (a) re-labeling of the eleven factors currently shown as “Safety Threats” to “Signs of Present Danger” and delinking them in analysis from the six questions designed to assess emerging danger over the thirty-day period of the investigation or assessment; (b) expand the discussion of vulnerability and guidance for its use in determining whether the child is safe or unsafe; (c) include the identified caregiver protective capacities in the determination of child safety rather than only in development of the safety response<sup>3</sup>; and (d) determine whether the three different terms currently used to designate safety interventions (i.e., *safety response*, *safety plan*, *voluntary safety plan*) are adequately differentiated and understood by staff.
2. Explore ways to eliminate duplication in required CPS documentation, particularly with regard to the information contained in the Assessment of Child Safety and District Attorneys Report.
3. Consider conducting a brief workload estimation study of child protection casework and supervisor positions to inform future requests for positions and to support retaining staff even in the face of reduced caseloads.
4. Give priority to provision of coaching and mentoring support for caseworkers and supervisors, particularly in the areas of safety assessment and decision making, safety planning and monitoring, and family engagement.
5. Establish “Practice Model” specialists in each Area for ongoing training and consultation. (Note: This should be in addition to the Child Welfare Field Liaison.)
6. Develop, train and implement guidelines and expectations for assessing and responding to risk/needs, absent a safety response.
7. Consider revisions to the Practice Model Guide to clarify the agency’s responsibility for providing services and possibly for obtaining court intervention in situations of high risk which do not, at the time of initial assessment, meet the criteria of *unsafe*.
8. Re-evaluate the efficacy and need for court ordered services to prevent placement and insure that families’ needs are being addressed and child’s safety will not be diminished.

The above recommendations should be viewed, not as criticisms of the practice and processes examined in this review, but as the logical next steps in continuous improvement of the significant changes implemented pursuant to recent legislation and adoption of the new practice model. The OKDHS executive team and child welfare staff are to be commended for their accomplishment of these changes in a relatively short period of time and for their persistent efforts to improve the protection of children who come to the attention of child protective services.

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<sup>3</sup> This recommendation is based on the opinion of these reviewers that caregiver protective capacity can, in some instances, negate the impact of factors that would otherwise create present or impending danger for the child. In such situations, children would therefore not be deemed unsafe.

Attachment A  
Authors' Biographical Information

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**Barry Salovitz, M.S.W., Senior Director, Casey Family Programs**

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Barry Salovitz is a strategic consultant with Casey Family Programs, the nation's largest operating foundation focused entirely on foster care and improving the child welfare system. He has 35 years of clinical, supervisory, quality assurance, project management and consultation experience in child welfare services, both in the private and public sectors. He is a prolific writer, trainer and conference speaker. His extensive consultation experience includes work with federal, state, and private child and family service organizations throughout the U.S., Canada and Bermuda. Formerly, he was the Director of the National Resource Center on Child Maltreatment.

Mr. Salovitz is co-author of the article "Evolving a Theoretical Model of Child Safety in Maltreating Families" (Child Abuse and Neglect, 12/06). He has also co-authored "Essential Safety Constructs in Child Maltreatment Cases" and was the principal developer of the most widely adopted front-end child safety model used in the U.S. today.

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**Sue D. Steib, LCSW, Ph.D., Senior Director, Casey Family Programs**

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Sue Steib is a senior consultant in the strategic consulting section of Casey Family Programs. Her child welfare experience spans forty years and includes casework and casework supervision as well as administration, planning, research, training, and consultation.

Dr. Steib has provided consultation in research-informed child welfare practice to numerous state and county child welfare systems. She is a frequent presenter at professional meetings and conferences and has published articles in juried child welfare journals and other professional publications. She served as the program director in Louisiana's statewide child and family services system and, immediately prior to joining Casey Family Programs in 2008, was the director of the Research to Practice Initiative at the Child Welfare League of America.