

Differential Response Implementation Plan

September 30, 2010



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Table of Contents

Introduction.....	2
Overview of Differential Response	2
Implementation Plan.....	5
Practice Guide	5
Technology	5
Staffing	6
Community Outreach	6
Training	6
Evaluation	6
Phase in Differential Response	6
Conclusion	6
Appendix 1: Glossary of Terms	7
Appendix 1: Glossary of Terms	7
Appendix 2: Families Together Amendment Act of 2010	8

Introduction

The Child and Family Services Agency (CFSA) developed and submitted a proposed model of Differential Response (DR) for the District of Columbia to the City Administrator and related partner agencies in September 2009. Early in FY09, CFSA formed an interagency work group to develop an implementation plan. Participation of representatives on this work group was critical to ensure clarity of each agency's role in Differential Response and our collective ability to provide seamless services and supports to families.

In June 2010, the Council of the District of Columbia enacted the Families Together Amendment Act of 2010. The primary goals of the law are:

- To authorize CFSA to refer a family for assessment in lieu of investigation in response to certain reports of abuse and neglect;
- To require a family assessment to commence within 5 days of receiving a report; and
- To authorize CFSA to issue rules pursuant to the act.

The new law must be implemented within 365 of the effective date of the Families Together Amendment Act, which is September 30, 2010. Although the law does not explicitly refer to Differential Response, passing this legislation was necessary to clear the way for local implementation of DR.

The purpose of this document is to present the District's plan for the implementation of DR. A brief overview of Differential Response and a summary of the progress to-date made by the interagency workgroup are also presented.

Overview of Differential Response

Differential Response (DR) is a best-practice approach that supports more than one type of response to initial reports of child abuse and neglect. In jurisdictions throughout the country that have implemented DR, it is also known as "dual track," "multiple tracks," or "alternative response." The DR approach recognizes the individual nature of and variation in each individual abuse and neglect report and values the unique strengths of the families and community resources in each individual circumstance.¹

¹ Schene, P. (2001). Meeting each family's needs: Using differential response in reports of child abuse and neglect. In *Best Practice, Next Practice*. Spring 2001, 1-14. National Child Welfare Resource Center for Family-Centered Practice.

Evaluation of Differential Response systems in other jurisdictions has found a variety of benefits, including:

- Better protection for more children over time as a result of engaging parents in the process of sustainable change with effective extended family and community based supports.
- Decline in repeat reports of abuse and neglect.
- Increased satisfaction and relationship building for both families and child protection workers.
- Effective use of resources that is cost neutral over time.

Through implementation of Differential Response, CFSA, other District agencies, and community partners will seek to achieve improved safety for children, deeper engagement of families, increased family and employee satisfaction, and establishment of a continuum of services that includes public and private non-profit community-based organizations.

In partnership with other District agencies, CFSA will use multiple pathways for accepted reports of suspected abuse and neglect, as described below.

Investigation

Under DR, this traditional pathway will be for families who have a report of suspected severe child abuse and/or neglect, such as physical or sexual abuse. CFSA will conduct an investigation in accordance with District law and determine whether maltreatment occurred or if the child is at risk of maltreatment. Please note that CFSA conducts joint investigations with the Metropolitan Police Department (MPD) for allegations of physical and sexual abuse.

Family Assessment

Families who enter this pathway will have an allegation of a low- to moderate-risk situation (such as educational neglect or inadequate housing). CFSA will conduct a family assessment to evaluate and identify the current level of family functioning, current risk of abuse/neglect to children in the home, and the family's strengths and service needs. Through a Differential Response Conference, the family and pertinent service providers will meet to develop a service plan and identify the lead agency to work with the family. That agency will continue to assess the family situation periodically throughout the duration of services.

Intensive Assessment Pathway

This pathway is for families who have current, active involvement with CFSA and who are the subject of subsequent viable reports of abuse/neglect. Through the intensive assessment pathway, the family assessment will serve as an integral part of empowering families and minimizing dependence on formal social services systems.

Interagency Working Group

In the fall of 2009, CFSA convened a working group to assist in developing specific components of the implementation plan, with the overall goal of ensuring a seamless system that effectively leverages resources across agencies. Agencies represented on the working group are shown in the box. The working group formed three subcommittees to address specific aspects of the DR model.

Interagency Working Group Participants

Child and Family Services Agency
DC Department of Human Services
DC Department of Health Care Finance
DC Department of Health, Addiction
Prevention and Recovery Administration
DC Department of Mental Health
DC Department of Youth Rehabilitative
Services
Deputy Mayor for Education
District of Columbia Public Schools
Metropolitan Police Department
Office of Victim Services

- **The Family Engagement Subcommittee** focused on the process of engaging families through the assessment pathway. The group developed a self-reporting needs assessment form for families to complete during the initial visit from the assessment worker. The assessment will empower the family and assist them in identifying services they believe they need.
- **The Interagency Alerts and Lead Agency Identification Subcommittee** developed a process to communicate across agencies when CFSA establishes a differential response assessment. This process will initiate the DR conference. Each District agency will identify a contact person to receive alerts and participate or assist in identifying appropriate staff to participate in the DR conference.
- **The Differential Response Conference Subcommittee** developed a process for coordinating and conducting a family-involved meeting that includes service providers currently involved and/or identified to support the family. The process addresses logistics, participants, purpose, process, and outcomes for the families. The goal of the meeting is to develop a family plan and to identify a lead agency responsible for case management.

This working group will reconvene in FY11 to finalize interagency procedures and processes in preparation for DR implementation later in the year.

Implementation Plan

CFSA and partner agencies will begin the implementation of DR by the fourth quarter of FY11 and will continue a phased implementation throughout FY12. An internal CFSA work group is completing action steps listed in the chart and described below.

Implementation Phase	Action Steps	2010			2011									
		Oct.	Nov.	Dec.	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	
1. Practice Guide	A. Develop policy and procedures	█	█	█										
	B. Develop Administrative Issuance			█	█	█	█	█	█	█				
2. Technology	A. Assess technology needs		█	█										
	B. Complete FACES updates				█	█	█	█	█	█	█			
3. Staffing	A. Develop staffing reassignment strategy		█	█	█	█								
	B. Complete assignments, notify staff						█							
4. Community Outreach	A. Engage community stakeholders				█	█		█	█	█				
	B. Complete interagency protocols						█	█	█					
5. Training	A. Develop curriculum				█	█	█	█						
	B. Train staff and partners								█	█				
6. Evaluation	Design DR evaluation an QA processes								█	█	█			
7. Phase In DR	Implement DR											█	█	█

Practice Guide

During the first quarter of FY11, CFSA will develop a comprehensive practice guide that includes policies, procedures, and an assessment tool. CFSA will develop and distribute an Administrative Issuance to establish these operational guidelines throughout the agency.

Technology

The CFSA Child Information Systems Administration (CISA) will lead an assessment of the technology infrastructure and data reporting tools needed to support implementation of DR. CISA will adjust FACES as necessary, including data collection to support regular reports, by the end of third quarter FY11.

Staffing

With support from CFSA Human Resources, CFSA Agency Programs will develop a staffing strategy and complete staffing notifications and reassignments by the end of second quarter FY11.

Community Outreach

CFSA will engage partner agencies while also reaching out to other stakeholders and the community. Tasks will include finalizing interagency agreements and protocols, seeking stakeholder input, conducting targeted forums, and distributing informational materials.

Training

The CFSA Training Academy will develop a DR curriculum and plan for training CFSA and partner agency staff who will participate in the DR launch and initial implementation.

Evaluation

CFSA will design an evaluation to measure and monitor the outcomes of the newly implemented DR model. Ongoing quality assurance processes will also be designed.

Phase in Differential Response

CFSA Child Protective Services will begin directing selected reports of suspected neglect to the Family Assessment and Intensive Assessment Pathways in the fourth quarter of FY11. In developing the Practice Guide, the internal CFSA work group will select a child abuse/neglect allegation type to serve as the focus of the initial implementation. CPS will launch DR within one or two CPS units and phase in additional units throughout FY12.

Conclusion

Through implementation of Differential Response, CFSA, other District agencies, and community partners will seek to achieve improved safety for children, deeper engagement of families, increased family and employee satisfaction, and establishment of a continuum of services that includes both public and private, non-profit resources. This approach vastly improves support for families that can lead to greater safety and well-being measures for children.

This plan provides a clear road map for establishing this best practice in the District of Columbia. Continued partnership from District agencies, community partners, and other key stakeholders will be essential to the success of this project.

Appendix 1: Glossary of Terms

Assessment Pathway:

An alternative response to reported allegations of abuse and/or neglect.

Differential Response (DR):

An alternative approach to addressing concerns of abuse and/or neglect reported to the intake hotline.

Differential Response Conference (DRC):

Conference held with family on the assessment pathway involving community providers, District agencies and the family. This meeting is lead by the CFSA social worker and addresses the family's need when developing a service plan.

Family Assessment Summary (FAS):

A document that provides information on the past and current services the family has had or needs. The FAS will be provided to the community and District agency participants at the Differential Response Conference.

Family Engagement:

The process of building a collaborative working relationship for the purpose of meeting the identified and individualized service plan goals of the family; ability to understand and work through a family's resistance to receive services.

Intensive Assessment Pathway:

An assessment pathway used for in-home cases where there is already CFSA involvement.

Maltreater:

Person alleged to have abused and/or neglected a person under the age of 18.

Traditional Investigation Pathway:

Pathway used for referrals that involve severe cases of neglect, physical abuse, sexual abuse and institutional abuse and/or neglect.

Appendix 2: Families Together Amendment Act of 2010

AN ACT

IN THE COUNCIL OF THE DISTRICT OF COLUMBIA

Codification
District of
Columbia
Official Code

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West Group
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To amend the Prevention of Child Abuse and Neglect Act of 1977 to authorize the Child and Family Services Agency to refer a family for a family assessment in lieu of investigation in response to certain reports of abuse and neglect, to provide for a re-referral for investigation when warranted, to require the Child and Family Services Agency to submit a progress report on the implementation of the use of family assessments to the Council's Committee on Human Services, and to require the Mayor to issue rules to implement the provisions of this act.

BE IT ENACTED BY THE COUNCIL OF THE DISTRICT OF COLUMBIA, That this act may be cited as the "Families Together Amendment Act of 2010".

Sec. 2. The Prevention of Child Abuse and Neglect Act of 1977, effective September 23, 1977 (D.C. Law 2-22; D.C. Official Code § 4-1301.01 et seq.), is amended as follows:

(a) Section 102 (D.C. Official Code § 4-1301.02) is amended by adding a new paragraph (9A) to read as follows:

Amend
§ 4-1301.02

“(9A) “Family assessment” means an evaluation, for the purpose of developing a service plan, to determine:

“(A) A family's strengths and needs;

“(B) The safety of any children in the home, including assessing whether there exists a risk of abuse or neglect of any child, but excludes a determination as to whether a report of abuse or neglect is substantiated, inconclusive, or unfounded;

“(C) A family's ability to function as a cohesive unit; and

“(D) A family's access to resources.”.

(b) Section 104 (D.C. Official Code § 4-1301.04) is amended as follows:

Amend
§ 4-1301.04

(1) Subsection (a) is amended as follows:

(A) The existing text is designated as paragraph (1).

(B) The newly designated paragraph (1) is amended by striking the phrase “or children.” and inserting the phrase “or children when a report involves a child fatality, suspected sex abuse, or the Agency suspects a child is at imminent risk of or has experienced abuse or neglect that the Agency determines to be severe.” in its place. (C) New paragraphs (2), (3), (4), (5), and (6) are added to read as follows:

“(2) For all other reports of suspected child abuse or neglect, the Agency, directly or through a contractor or another appropriate District agency, shall conduct

either a thorough investigation or a family assessment. A family's cooperation with the family assessment and its acceptance of services offered pursuant to the assessment shall be voluntary; provided, that there are no child-safety concerns.

"(3) If at any time the Agency determines that a report referred for family assessment should be re-referred for an investigation, the Agency shall commence an investigation pursuant to subsections (b), (c), and (d) of this section and the requirements of this act.

"(4) If the family assessment determines that the family needs services, the Agency, directly or through a contractor or another appropriate District agency, shall assist the family in obtaining these services.

"(5) The family assessment shall commence as soon as possible, but no later than 5 days after the Agency's receipt of the report, and shall include seeing the child and all other children in the household within that 5-day period; provided, that the report does not involve a child who is at imminent risk of or has experienced abuse or neglect that the Agency determines to be severe, in which case the report shall be referred for investigation.

"(6) If at any time the Agency finds, through an evaluation, that the time period of 5 days to commence a family assessment is not serving the best interest of families and children, it shall re-evaluate its practices regarding commencement and implementation of the family assessment, comparing its practices with national standards and best practices. The Agency shall report the conclusions of any re-evaluation to the Council, along with recommendations, if any, for legislative initiatives that address the conclusions of the report."

(2) Subsection (b) is amended as follows:

(A) Paragraph (1) is amended by striking the phrase "or neglect" and inserting the phrase "or neglect or a referral for investigation following a family assessment" in its place.

(B) Paragraph (2) is amended by striking the phrase "any report" and inserting the phrase "any report or a referral for investigation following a family assessment" in its place.

(3) Subsection (c)(3) is amended as follows:

(A) Subparagraph (E) is amended by striking the word "and" at the end.

(B) Subparagraph (F) is amended by striking the period and inserting the phrase "; and" in its place.

(C) A new subparagraph (G) is added to read as follows:

"(G) A finding as to whether the report of abuse or neglect is substantiated, inconclusive, or unfounded, unless at any time during the investigation the Director determines it appropriate to refer the family for a family assessment and suspends the investigation to complete a family assessment in accordance with rules issued pursuant to section 601(d)."

(4) A new subsection (e) is added to read as follows:

"(e)(1) The use of family assessments, where appropriate, shall be fully implemented within 365 days of the effective date of the Families Together Amendment Act of 2010, passed on 2nd reading on June 15, 2010 (Enrolled version of Bill 18-667).

"(2) On or before October 1, 2010, the Agency shall submit a written report

to the Council's Committee on Human Services detailing the Agency's progress toward using family assessments as authorized by this section, which shall include:

“(A) A detailed review of the steps taken toward full implementation of this alternative to investigation; and

“(B) An evaluation of the strengths and needs of the implementation process.”.

Amend
§ 4-1306.01

(c) Section 601 (D.C. Official Code § 4-1306.01) is amended by adding a new subsection (d) to read as follows:

“(d)(1) Within 180 days of the effective date of the Families Together Amendment Act of 2010, passed on 2nd reading on June 15, 2010 (Enrolled version of Bill 18-667) (“Families Together amendment”), the Mayor, pursuant to Title I of the District of Columbia Administrative Procedure Act, approved October 21, 1968 (82 Stat. 1204; D.C. Official Code § 2-501 *et seq.*), shall issue rules to implement the Families Together amendment.

“(2) The proposed rules shall be submitted to the Council for a 30-day period of review, excluding Saturdays, Sundays, legal holidays, and days of Council recess. If the Council does not approve or disapprove the proposed rules, in whole or in part, by resolution within the 30-day review period, the proposed rules shall be deemed approved.”.

Sec. 3. Applicability.

This act shall apply upon the inclusion of its fiscal effect in an approved budget and financial plan.

Sec. 4. Fiscal impact statement.

The Council adopts the fiscal impact statement in the committee report as the fiscal impact statement required by section 602(c)(3) of the District of Columbia Home Rule Act, approved December 24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(3)).

Sec. 5. Effective date.

This act shall take effect following approval by the Mayor (or in the event of veto by the Mayor, action by the Council to override the veto), a 30-day period of Congressional review as provided in section 602(c)(1) of the District of Columbia Home Rule Act, approved December

24, 1973 (87 Stat. 813; D.C. Official Code § 1-206.02(c)(1)), and publication in the District of Columbia Register.