POLICY TITLE: Policy Development

Approved By:	Date Approved:	Original Effective Date:	Latest Revision:	Latest Review:
Director Tanya Torres Trice, LICSW	04/20/2026	7/17/2006	04/20/2026	04/20/2026

I. AUTHORITY

The Director of the Child and Family Services Agency (CFSA or Agency) adopts this policy to be consistent with the Agency's mission, and applicable federal and District of Columbia laws, rules and regulations.

II. APPLICABILITY

All CFSA staff and contracted personnel (hereafter "employees")

III. RATIONALE

CFSA requires a structured system of clearly defined policies and procedures that align with its mission and reflect best practice standards. These policies and procedures articulate the Agency's stance on critical issues and provide consistent, comprehensive guidelines to assist staff with completing their work, ensure accountability and provide CFSA with decision making authority.

IV. POLICY

A CFSA Policy is a formal set of rules and procedures, outlined in CFSA's Online Policy Manual, that guide the actions and decisions of staff, contractors, and partners in delivering child welfare services.

CFSA shall develop and maintain policy documents organized into an internet-accessible manual that outlines Agency business practices, provides consistent guidance, and defines employee roles, duties, and responsibilities. All policies must comply with applicable laws, collective bargaining agreements, memoranda of understanding, court orders, training requirements, and recognized best practice standards.

Every CFSA employee, grantee, contracted personnel, and volunteer is responsible for reading, understanding, and adhering to all policies outlined in CFSA's Online Policy Manual.

V. CONTENTS

Section A: General Requirements for Policy and Procedure Development
Section B: Executive Sponsor
Section C: Policy Specialists & Supervisor
Section D: Office of the General Counsel
Section E: Publication of Policy Documents
Section F: Training & Policy Implementation
Section G: Discontinued Policies

VI. ATTACHMENTS

A. Policy Scope Meeting Form
B. Implementation Plan Template

VII. SECTIONS

Section A: General Requirements for Policy and Procedure Development

The development of all CFSA policies and procedures shall align with the Agency's core principles and comply with all federal and District regulations:

1. All policy documents shall be available in CFSA's Online Policy Manual, with the exception of Health Insurance Portability and Accountability Act (HIPAA) Policies *(See section A(6)(d) below for more* information on HIPAA policies).

2. The supervisor of the Planning and Policy (P&P) Unit and policy specialists are responsible for overseeing the following general policy-related tasks:
   a. Research and drafting of policy documents
   b. Management, filing, and archiving of finalized Agency policies
   c. Maintenance and updating of internet-accessible policy manuals

3. Requests for new policies, or updates to existing policies, shall be initiated by the Executive Sponsor (ES), their designee, or the P&P Unit.
   a. All requests shall be submitted through the Planning and Policy Unit email at cfsa.policies@dc.gov.
   b. Requests and updates of policies and procedures made by the ES or their designee shall be first vetted by P&P Unit for approval.

4. All requests for a review of a policy document shall include a proposed timeline.

5. If the P&P Unit denies a policy initiative request, the P&P supervisor must provide the requestor with a written explanation for the denial.

6. Policy documents shall be developed in one of the following forms:
   a. **Program Policies –** These address client-related functions of the Agency, such as the Permanency Policy and the Placement and Matching Policy.
   b. **General Administrative Policies –** These govern matters that directly affect Agency employees, grantees, and contractors, such as the Alternate Work Schedule Policy and the Sexual Harassment Policy.
   c. **Business Processes-**These policy documents identify a set of steps that explain how the Agency carries out day-to-day operations.

d. **Health Insurance Portability and Accountability Act (HIPAA) Policies** – These policies ensure the Agency's compliance with federal regulations regarding the protection of client confidentiality, as well as the security of equipment and data. To safeguard sensitive information related to CFSA's Comprehensive Child Welfare Information System (CCWIS), these policies are distributed exclusively to Agency employees and not included in CFSA's Online Policy Manual.

e. **Administrative Issuances –** These serve as interim policies or provide guidance on procedures and protocols. Issuances communicate important information to staff and contracted service providers regarding modifications or revisions to existing policies or procedures. They also establish minimum standards of practice while new policies or procedures are being developed. Once a new policy addresses the subject matter of an issuance, the issuance shall be incorporated into the new policy and removed from CFSA's Online Policy Manual.

f. **Quick Reference Guides –** These highlight pertinent procedures and protocols that are already detailed in existing policies, such as Frequently Asked Questions (FAQs) and tip sheets.

7. Development of policies and procedures shall include input from both internal and external stakeholders relevant to the subject matter.

8. All policies shall be finalized within the timeframe identified by the ES and documented by a Policy Scope Meeting Form, which is signed at the start of the policy development process and includes the policy title, assigned specialist, deadlines, and signatures of the specialist, their supervisor, and the ES or designee.

9. The Policy Scope Meeting is a structured planning session convened at the start of developing or updating a CFSA policy. Its purpose is to establish the policy's scope, objectives, timelines, and responsibilities, ensuring alignment with agency standards, and legal requirements.

10. The Policy Scope Meeting shall include the Executive Sponsor, policy specialist, and relevant subject matter experts.

11. Each policy shall be approved and signed by the director or designee prior to implementation.

12. Every CFSA employee, grantee, contracted personnel, and volunteer is responsible for reading, understanding, and adhering to all policies outlined in CFSA's Online Policy Manual.

Section B: Executive Sponsor

An Executive Sponsor (ES) is a member of CFSA's executive leadership team who provides strategic oversight and support during the policy development process. The ES is responsible for the following policy development activities:

1. **Assistance to Policy Specialists.** Assist the policy specialist with resource support, including but not limited to the following activities:

   a. Participate in a policy scope meeting with the assigned specialist to determine policy development logistics.

   b. Identify subject matter experts to serve as workgroup participants and address issues related to workgroup attendance.

c. Review policy drafts and provide feedback within an agreed-upon timeframe established with the policy specialist.

d. Interface with stakeholders and distribute draft documents to them for review, as needed.

e. Review and resolve drafted Issues Memoranda.

f. Determine appropriate responses to legal sufficiency comments.

g. Work collaboratively with policy specialists to develop an implementation and training plan, including proposed dates for implementation and training, communication strategies and monitoring for compliance.

2. **Notifications.** Notify the P&P Unit of any legislative changes or practice modifications that are specific to the roles and responsibilities of the Executive Sponsor's administration.

3. **Policy Compliance.** Monitor implementation to ensure compliance with the policy.

Section C: Policy Specialists & Supervisor

1. Policy specialists are accountable for the lifecycle of CFSA policy development, ensuring that all policies are researched, drafted, reviewed, approved, and published in compliance with applicable laws, regulations, and Agency standards. policy specialists shall adhere to the following requirements:

   a. **Research and Analysis.** Conduct comprehensive research of all relevant statutes, regulations, prior CFSA policies, professional standards, state policies, court orders, and memoranda of understanding to ensure legal and operational accuracy.

   b. **Stakeholder Engagement and Workgroup Management.** Convene and facilitate policy workgroups, establish agendas, track attendance, and integrate stakeholder feedback throughout the development process. Workgroups must address timelines, implementation readiness, training needs, fiscal and contractual impacts, and CCWIS/data considerations.

   c. **Drafting and Review.** Draft policy documents using Agency-approved templates and style guides. Ensure clarity, consistency, and compliance, manage peer review, and incorporate feedback prior to Legal Sufficiency Review (LSR).

   d. **Legal Sufficiency and Approval.** Coordinate with the Office of the General Counsel (OGC) to obtain legal sufficiency and revise drafts as required. Finalized policies shall be submitted to the Agency Director (or designee) for review, approval, and signature and published.

   e. **Implementation and Training Support.** Within seven (7) calendar days of posting, confirm implementation and training plans with the ES and provide limited program support until roll-out is complete.

   f. **Monitoring and Maintenance.** Conduct annual reviews to determine whether revisions are required due to legislative, programmatic, or practice changes. Policies will also be updated as needed to reflect new laws or changes in best practices. Updates shall be prioritized by the policy supervisor, and archived versions maintained for reference.

2. The P&P supervisor is accountable for the oversight and governance of CFSA's policy development process. The supervisor shall ensure that all policies are developed, reviewed, approved, and maintained in compliance with applicable laws, regulations, and Agency standards. The supervisor's responsibilities include:

   a. **Process Management.** Oversee the policy development process, ensuring adherence to timelines, quality standards, and compliance with federal and District mandates.

   b. **Assignment and Support.** Designate policy assignments to policy specialists and provide guidance, technical assistance, and resources necessary for policy finalization.

   c. **Priority Setting.** Maintain and update a policy priority list based on statutory, regulatory, and operational requirements, ensuring timely development and revision of policies.

   d. **Stakeholder Coordination**. Serve as the primary liaison for internal and external stakeholders, including the OGC, ES, program leadership, and contracted partners to ensure alignment and legal sufficiency.

   e. **Quality Assurance.** Ensure all policies meet Agency standards for clarity, consistency, and accessibility, including adherence to approved templates, style guides, and version control requirements.

   f. **Finalization and Publication.** Oversee the finalization process, including copy-editing, formatting, submission of policies to the Agency Director, and posting to the CFSA Online Policy Manual. Ensure proper distribution to staff, contractors, and stakeholders.

   g. **Maintenance and Review.** Conduct annual reviews of existing policies to determine whether updates are required due to legislative, programmatic, or practice changes. Ensure timely revisions and archiving of superseded versions.

   h. **Resource Coordination.** Collaborate with Child Information Systems Administration (CISA) and other Agency units to ensure policy specialists have access to necessary technology, tools, and supplies.

   i. **Compliance Monitoring.** Monitor adherence to policy development standards and timelines. Address barriers to timely completion through escalation to executive leadership, as needed.

Section D: Office of the General Counsel

1. All policy-related documents shall undergo Legal Sufficiency Review (LSR) by the CFSA Office of the General Counsel (OGC) prior to finalization.

2. OGC shall complete its review and return comments to the policy supervisor or designated policy specialist within 10 business days of receipt.

3. Policy specialists shall collaborate with OGC to address all comments and ensure that policies meet legal requirements.

4. No policy shall proceed to the Agency Director (or designee) for signature or publication without documented LSR approval from OGC.

Section E: Publication of Policy Documents

1. Upon signature by the Agency Director (or designee), the P&P supervisor, or their designee, shall ensure the following actions are completed:
    a. Securely store the signed policy document in the Agency's designated cloud-based system.
    b. Forward a copy of the signed document to the CFSA Office of Public Information (OPI) with a request for dissemination via an "All Staff" email, as determined by the Implementation Plan.
2. OPI shall include CFSA-contracted agency staff in all communications announcing new or revised policies, except where policies are subject to HIPAA or other confidentiality restrictions.

Section F: Training & Policy Implementation

1. The P&P Unit shall collaborate with CFSA's Child Welfare Training Academy (CWTA), the Human Resources Administration (HRA), and other relevant administrations to ensure that CFSA and contracted agency staff receive timely and accurate training on all new and revised policies.
2. The P&P shall ensure that policies are integrated into existing training programs.
    a. Within 7 calendar days of publication of a new policy, HRA shall incorporate the policy's subject matter into the next scheduled new employee orientation.
    b. CWTA shall integrate new or revised policies into the next scheduled cycle of pre-service and/or in-service training for social workers, supervisors, and managers.
    c. Additional training shall be coordinated by the ES, HRA, and CWTA as needed to address specialized or urgent topics.
    d. Policy specialists shall collaborate with relevant administrations to develop appropriate training formats, which may include webinars, brown-bag sessions, and online presentations.
3. CFSA and contracted agency program administrators, managers, and supervisors shall ensure that refresher training courses are scheduled, as necessary, and staff remain informed of policy updates.
4. For all policies that require training, as identified in the Implementation Plan, all CFSA staff, grantees, and contracted partners shall complete training on new policies within 45 calendar days of publication. The Implementation Plan shall outline the process for tracking training completion.

Section G: Discontinued Policies

1. Policies removed from CFSA's Online Policy Manual are considered obsolete and shall no longer be referenced or applied in Agency practice.
2. Prior to removal, the ES or their successor must review and approve the discontinuation request.
3. A policy may only be discontinued with written authorization from the Agency Director or Deputy Director.
5. Notification of removal shall be provided to the Agency Director and documented by the Policy Unit.