

Co-Neutral Commentary Five

Issued October 2015

Compromise and Settlement Agreement

(D.G. vs. Yarborough, Case No. 08-CV-074)

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I. Introduction

On January 4, 2012, the Oklahoma Department of Human Services (DHS) and Plaintiffs reached agreement in a long-standing federal class action lawsuit against the State of Oklahoma on behalf of children in the custody of DHS due to abuse and neglect by a parent or guardian. That matter, *D.G. vs. Yarborough*, Case No. 08-CV-074, resulted in the Compromise and Settlement Agreement (CSA), which was approved by the United States District Court for the Northern District of Oklahoma on February 29, 2012. The CSA requires (Section 2.10 (a)) that DHS develop a plan setting forth “specific strategies to improve the child welfare system.” Under the CSA, the parties identified and the court approved Eileen Crummy, Kathleen Noonan, and Kevin Ryan as “Co-Neutrals,” and charged them to evaluate and render judgment about the ongoing performance of DHS to strengthen its child welfare system to better meet the needs of vulnerable children, youth, and families. The CSA states specifically (Section 2.10 (i)) that, “Twice annually, the Co-Neutrals shall provide commentary regarding the Department’s overall progress as reflected by the [data] reports and shall provide commentary as to whether the Department is making good faith efforts pursuant to Section 2.15 of the Settlement Agreement.”

DHS, with the assistance of state leaders, advocates, and other stakeholders, developed the Pinnacle Plan, which contains significant commitments to be implemented beginning in State Fiscal Year (SFY) 2013. The Co-Neutrals approved the Pinnacle Plan on July 25, 2012.

The CSA charged DHS with identifying baselines and Target Outcomes to measure and report the state’s progress in core performance areas, which are grouped in the following seven performance categories:

- Maltreatment (abuse and neglect) of children in the state’s legal custody (MIC);
- Development of foster homes and therapeutic foster homes (TFCs);
- Regular and consistent visitation of caseworkers with children in the state’s legal custody;
- Reduction in the number of children in shelters;
- Placement stability, reducing the number of moves a child experiences while in the state’s legal custody;
- Child permanency, through reunification, adoption or guardianship; and,
- Manageable caseloads for child welfare staff.

As required by the CSA, the Co-Neutrals and DHS established the Metrics, Baselines, and Targets Plan (the “Metrics Plan”) on March 7, 2013. For each of the seven performance categories, the Metrics Plan establishes: the methodology for the performance metrics and measuring progress; parameters for setting baselines; interim and final performance targets

and outcomes; and the frequency by which DHS must report data and information to the Co-Neutrals and the public.

Appendix A provides a summary chart of the metrics for the seven performance areas, with corresponding baselines and targets, established by DHS and the Co-Neutrals, and updated through September 2015.¹

The CSA further requires the Co-Neutrals to provide commentary and issue a determination as to whether DHS' data submissions provide sufficient information to measure accurately the Department's progress. **The Co-Neutrals have previously found data sufficiency for all the CSA performance areas and data metrics.** Pursuant to the CSA, the Co-Neutrals may revise any determination of data sufficiency based on subsequent or ongoing data submissions as deemed appropriate.

This document serves as the Co-Neutrals' Fifth Commentary under the CSA and **reflects DHS' performance, data, and information available through June 2015.** In numerous instances, as described in this report, data and information are only available through March 31, 2015 (due to reporting lags or intervals agreed upon previously by the Co-Neutrals and DHS). In addition, in some instances, the Co-Neutrals report on more recent decisions or activities by DHS to reflect, when possible, the most current view of the reform.

II. Summary of Progress and Challenges Ahead

As a result of its efforts, DHS is able to report progress in a number of areas identified for improvement in the CSA, and at the same time continues to face challenges in several other areas. The following highlights accomplishments DHS achieved for Oklahoma's children since the last report period:

- *Significant Improvements in Caseloads:* Since the last reporting period, DHS made **significant gains to reduce caseload sizes** for child welfare workers. Providing caseworkers with manageable caseloads is vitally important to achieve safety, permanency and well-being for children. While DHS has much work ahead to reach its Target Outcome, **DHS has laid the foundation for ongoing progress by implementing key strategies for hiring and retention, including graduated caseloads for new caseworkers.**

¹ Under Section 2.10(f) of the CSA, the Co-Neutrals shall issue Baseline and Target Outcomes, which shall not be subject to further review by either party but may at the discretion of the Co-Neutrals, after providing the parties an opportunity to comment, be revised by the Co-Neutrals.

- *Caseworker Visitation with Children by Primary Caseworker:* DHS continues to report strong performance in the area of caseworkers completing required monthly visits with the children assigned to them. For the first time, DHS reported on its most stringent measure for primary caseworker visits with children, which is the metric that reviews the percent of children who had six consecutive visits with the same primary caseworker. Within one report period, DHS improved its performance to 49.60 percent - up from 40.6 percent - of children who were in care at least six months having six consecutive visits with the same primary caseworker. A survey the Co-Neutrals recently conducted with more than 150 foster parents determined that **the majority of foster parents are satisfied with the quality of the monthly visits with their foster children's caseworkers.**

The Co-Neutrals observed the following challenges, among others, during this report period:

- *Inadequate Supply of Therapeutic Foster Homes for Children:* DHS has not achieved the necessary gains in the number of TFC homes available for children with special needs. Further, **DHS continues to report a substantial number of vacant TFC homes (31 percent or 134 of 437 available TFC homes), while it continues to report an equally substantial wait list of 124 children who need and are waiting for a TFC placement.**
- *Overuse of Shelters for Children Ages Thirteen and Older:* The number of children ages 13 and older in shelters **continued to trend negatively above the baseline** established at the beginning of the reform. During the first six months of 2012, children ages 13 and older spent a total of 20,635 nights in shelters. During this six-month report period, DHS reported that the number of shelter-nights increased to 24,552 shelter-nights for this group. Further, DHS' performance also declined this period for the percent of children 13 and older who met the requirements of Pinnacle Plan Point 1.17. This commitment requires DHS to achieve an increasingly higher percentage of children ages 13 and older placed in shelters who experience no more than one shelter stay and no more than 30 shelter nights in any 12-month period.

The CSA requires that the Co-Neutrals determine whether DHS has "made good faith efforts to achieve substantial and sustained progress" toward a Target Outcome. This standard requires more than an assessment of DHS' intentions but necessarily requires a conclusion by the Co-Neutrals that is based on an analysis of the activities undertaken and decisions made by DHS

and the impact of those decisions and activities on achieving substantial and sustained progress toward a Target Outcome, as defined in the CSA, the Pinnacle Plan, and the Metrics Plan.

The CSA requires the Co-Neutrals to report on those Target Outcomes that DHS has met, those for which the Department has achieved sustained, positive trending toward the Target Outcomes, and those Target Outcomes for which DHS has not achieved sustained, positive trending. The following table summarizes the Co-Neutrals’ findings of DHS’ progress toward the Target Outcomes and, separately, the Co-Neutral’s assessment of DHS’s efforts for each of the performance metrics assessed during this report period.

Table 1: Summary of Target Outcomes

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
1. MALTREATMENT IN CARE (MIC)				
1.A: Of all children in foster care during the reporting period, what percent were not victims of substantiated or indicated maltreatment by a foster parent or facility staff member in a 12 month period.	Target is due June 30, 2016	No	No	54
1.B: Of all children in legal custody of DHS during the reporting period, what number and percent were not victims of substantiated or indicated maltreatment by a parent and what number were victims.	Target is due June 30, 2016	No	No	56
2. FOSTER AND THERAPEUTIC FOSTER CARE (TFC) HOMES				
2.A: Number of new foster homes (non-therapeutic, non-kinship) approved for the reporting period.	SFY15 – No	No	Yes	19
Net gain/loss in foster homes (non-therapeutic, non-kinship) for the reporting period.	SFY15 – No	No	Yes	22
2.B: Number of new therapeutic foster homes (TFC) reported by DHS as approved for the reporting period.	SFY15 – No	No	No	29

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
Net gain/loss in TFC homes for the reporting period.	SFY15 – No	No	No	29
3. CASEWORKER VISITS				
3.1: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between caseworkers and children in foster care for at least one calendar month during the reporting period.	Yes	Yes	Yes	58
3.2: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between primary caseworkers and children in foster care for at least one calendar month during the reporting period.	Yes	Yes	Yes	59
3.3b: The percentage of children in care for at least six consecutive months during the reporting period who were visited by the same primary caseworker in each of the most recent six months, or for those children discharged from DHS legal custody during the reporting period, the six months prior to discharge.	Target of 65% due by end of 2016	Trending data is unavailable - initial performance data provided during this period.	Yes	59

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
4. PLACEMENT STABILITY				
4.1a: Percent of children in legal custody of DHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 8 days but less than 12 months, the percentage that had two or fewer placement settings.	Target is due June 30, 2016	Yes, but limited	Yes	63
4.1b: Percent of children in legal custody of DHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 12 months but less than 24 months, the percentage that had two or fewer placements.	Target is due June 30, 2016	Yes, but limited	Yes	63
4.1c: Percent of children in legal custody of DHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 24 months, the percentage that had two or fewer placement settings.	Target is due June 30, 2016	Yes, but limited	Yes	63
4.2: Of those children served in foster care for more than 12 months, the percent of children who experienced two or fewer placement settings <i>after</i> their first 12 months in care.	Target is due June 30, 2016	Yes, but limited	Yes	63
5. SHELTER USE				
5.1: The number of child-nights during the past six months involving children under age 2 years.	No	Yes, but close monitoring is needed as numbers increasing again.	Yes	41

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
5.2: The number of child-nights during the past six months involving children age 2 years to 5 years.	No	Yes	Yes	41
5.3: The number of child-nights during the past six months involving children age 6 years to 12 years.	No	Yes	Yes	42
5.4: The number of child-nights during the past six months involving children ages 13 years or older.	No	No	No	43
1.17: Percent of children 13 and older in a shelter who stayed less than 30 days and no more than one time in a 12-month period.	No	No	No	43
6. PERMANENCY				
6.1: Of all children who were legally free but not living in an adoptive placement as of January 10, 2014, the number of children who have achieved permanency.	Target is due June 30, 2016	Yes – for children ages 12 and under	Yes – for children ages 12 and under	67
		No – for children ages 13 and older	No – for children ages 13 and older	67
6.2a: The number and percent of children who entered foster care 12-18 months prior to the end of the reporting period who reach permanency within one year of removal, by type of permanency.	Target is due June 30, 2016	No	No	69

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
6.2b: The number and percent of children who entered their 12 th month in foster care between 12-18 months prior to the end of the reporting period who reach permanency within two years of removal, by type of permanency.	Target is due June 30, 2016	No	No	70
6.2c: The number and percent of children who entered their 24 th month in foster care between 12-18 months prior to end of reporting period who reach permanency within three years of removal, by type of permanency.	Target is due June 30, 2016	No	No	71
6.2d: The number and percent of children who entered their 36 th month in foster care between 12-18 months, prior to the end of the reporting period who reach permanency within four years of removal.	Target is due June 30, 2016	No	No	72
6.3: Of all children discharged from foster care in the 12 month period prior to the reporting period, the percentage of children who re-enter foster care during the 12 months following discharge.	Target is due June 30, 2016	Yes	Yes	73
6.4: Among legally free foster youth who turned 16 in the period 24 to 36 months prior to the report date, the percent that exited to permanency by age 18; stayed in foster care after age 18, and exited without permanency by age 18.	Target is due June 30, 2016	No	No	74

Metric	Has Met Target Outcome	Has Achieved Sustained, Positive Trending Toward the Target Outcome	Has Made Good Faith Efforts to Achieve Substantial and Sustained Progress Toward the Target Outcome	Page in Report
6.5: Of all children who became legally free for adoption in the 12 month period prior to the year of the reporting period, the percentage who were discharged from foster care to a finalized adoption in less than 12 months from the date of becoming legally free.	Target is due June 30, 2016	No	Yes	76
6.6: The percent of adoptions that did not disrupt over a 12 month period, of all trial adoptive placements during the previous 12 month period.	Target is due June 30, 2016	No	No	77
6.7: The percent of children whose adoption was finalized over a 24 month period who did not experience dissolution within 24 months of finalization.	Target is due June 30, 2016	Yes	Yes	77
7. CASELOADS				
Supervisors	No	Yes	Yes	39
Caseworkers	No	Yes	Yes	34

Methodology

To prepare this report, the Co-Neutrals conducted a series of verification activities to evaluate DHS' progress and implementation of its commitments. These activities included regular meetings with DHS leadership and staff, private agency leadership, and child welfare stakeholders. In addition, the Co-Neutrals visited children's shelters, both the state-run shelters and private shelters DHS uses across the state. The Co-Neutrals also reviewed and analyzed a wide range of aggregate and detailed data produced by DHS, and child and foster home records, policies, memos, and other internal information relevant to DHS' work during the period.

The remainder of this report includes:

- Context Data of Children in DHS Custody (Section III);
- Remedial Order: November 2014 (Section IV);

- Core Strategies: Phase I and II (Section V);
- Seven Performance Categories: Assessment of Progress and Good Faith Efforts (Section VI);
- Appendices; and,
- Glossary of Acronyms.

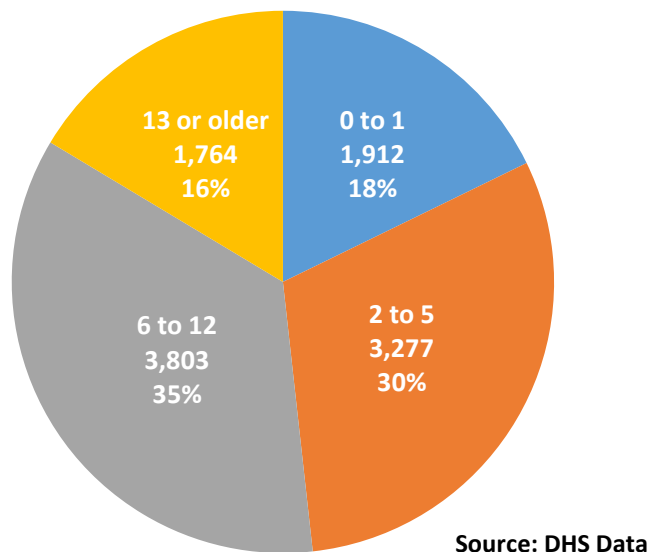
III. Context: Children in DHS Custody

Demographics

DHS reported there were 10,756 children in custody as of June 30, 2015 compared to 11,246 children in custody on July 1, 2014.² During the period from July 1, 2014 to June 30, 2015, 5,307 children entered care and 5,797 children exited care.

Young children aged zero to five years make up the largest portion (5,189 or 48 percent) of children in DHS custody. Children aged six to twelve years comprise 35 percent (3,803) of the population in care. Sixteen percent (1,764) are 13 years or older, as detailed in the following Figure:

Figure 1: Children in Care on June 30, 2015 by Age Group (Total=10,756)³



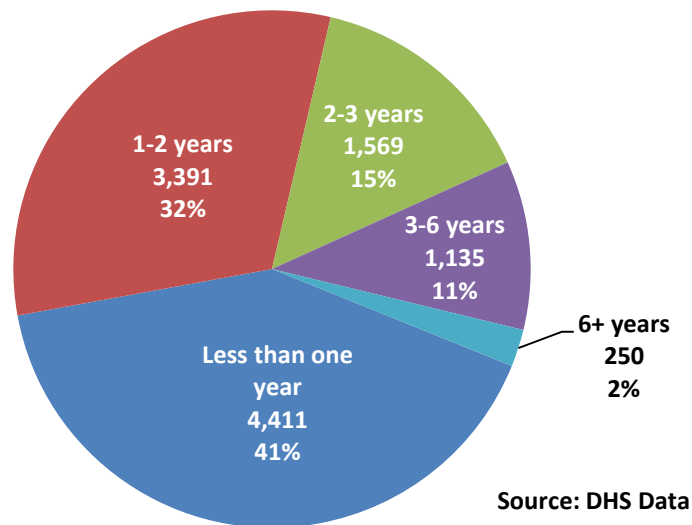
² At the Co-Neutral’s request, DHS submitted a more detailed data file that aligns with the state fiscal year. Therefore, the timeframe in this commentary does not match the timeframe in Commentary Four. The timeframes will match in future commentaries.

³ In Figures 1, 2 and 3, percentages do not add up to 100 due to rounding.

With regard to gender, the population is split almost equally — 51 percent male and 49 percent female. With regard to race, the population of children is 38 percent White, nine percent African-American and seven percent Native American. In addition, 18 percent of children identified with Hispanic ethnicity (and can be of any race). Twenty-eight percent identified with multiple race and ethnicity categories, of which 73 percent identified as Native American.⁴

As presented in Figure 2 below, DHS’ data shows that of the children in care on June 30, 2015, 41 percent (4,411) were in care for less than one year; 32 percent (3,391) between one and two years; 15 percent (1,569) between two and three years; 11 percent (1,135) between three and six years; and two percent (250) for more than six years.

Figure 2: Children in Care on June 30, 2015 by Length of Stay (Total=10,756)

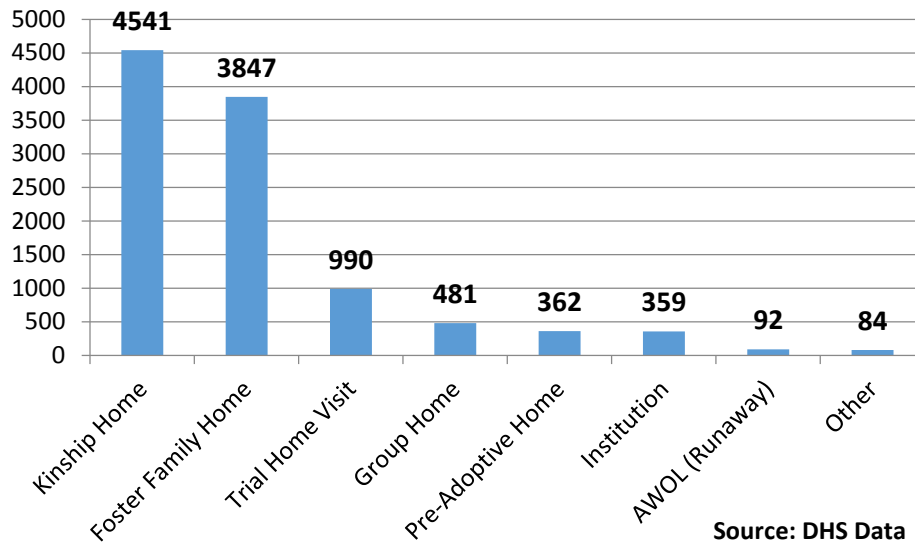


As the following chart demonstrates, 90 percent of children in DHS custody live in family settings, including in relative and non-relative kinship homes (42 percent), with foster families (36 percent), with their own parents (nine percent), and in homes that intend to adopt (three percent). Of children in custody, 840 (seven percent) live in institutional settings, including shelters, residential treatment and other congregate care facilities. The remaining two percent (176) reside in unidentified placements or are AWOL (runaway).⁵

⁴ Overall, 32 percent of children identified as Native American, including those children who identified with more than one race and ethnicity category and those identified as Hispanic.

⁵ Percentages in this paragraph do not add up to 100 percent due to rounding.

Figure 3: Children in Care on June 30, 2015 by Placement Type



Of the 9,740 children living in family settings, 1,888 (19 percent) are less than two years old, 3,228 (33 percent) are 2 to 5 years old, 3,528 (36 percent) are 6 to 12 years old, and 1,096 (11 percent) are 13 years or older. Of the 840 children living in institutional settings, 11 (one percent) are less than two years old, 28 (three percent) are 2 to 5 years old, 241 (29 percent) are 6 to 12 years old, and 560 (67 percent) are 13 years or older.⁶

IV. Remedial Order: November 2014

Section 2.14 of the CSA vests the Co-Neutrals with the authority to require, at any time, that DHS undertake and maintain diagnostic and remedial activities for any performance area if the Department fails to achieve positive trending or begins to trend negatively. On November 14, 2014, the Co-Neutrals issued a Remedial Order directing DHS to undertake and maintain diagnostic and remedial activities in three areas: 1) developing a sufficient pool of foster homes; 2) achieving manageable caseloads; and 3) reducing a backlog of child abuse and neglect investigations. (See Appendix B for the November 14, 2014 Remedial Order) The Remedial Order also required DHS to identify core strategies to improve performance in each of these areas which are discussed in the next section.

⁶ Percentages in this paragraph may not add up to totals due to rounding.

V. Core Strategies: Phase I and II

DHS developed Phase I Core Strategies which outlined specific activities it would implement to improve performance in the three areas addressed in the November 14, 2014 Remedial Order - foster homes, caseloads and, as a component of the caseloads Target Outcomes, the CPS backlog. The Phase I Core Strategies also included focused efforts to reduce children's shelter stays and achieve permanency for children who are legally free and living in an identified adoptive placement.⁷ During this report period, DHS began to implement the Phase I Core Strategies and report on the progress of the strategies' related activities. As noted in the corresponding performance area sections below, DHS experienced varied impact from its strategies, some of which DHS began to implement earlier within this report period. Earlier implementation allowed DHS time to evaluate the efficacy of these strategies to achieve progress toward the Target Outcomes. A number of DHS' core strategies were not implemented until much later in the report period and the Co-Neutrals will assess and comment on the results of DHS' implementation efforts in their next commentary.

Because DHS' progress was not apparent in some performance areas, particularly reducing child maltreatment in care, approving therapeutic foster homes and achieving permanency for children, the Co-Neutrals urged DHS to develop (during this report period) core strategies to bring greater and renewed focus to these areas. DHS finalized these Phase II Core Strategies in August 2015. In addition, the Co-Neutrals requested that DHS update its Phase I Core Strategies for increasing the pool of safe, available foster homes and reducing shelter usage. DHS finalized and the Co-Neutrals approved these core strategy updates in October 2015. (See Appendix C for DHS' approved Core Strategies⁸)

It should be noted that the Phase I and II Core Strategies do not replace the Pinnacle Plan, which DHS will continue to use to improve its child welfare system over time. However, the Co-Neutrals will focus their review and assessment of DHS' efforts on the agency's management and refinement of its Core Strategies to achieve substantial and sustained progress toward the Target Outcomes. The strategies, developed by DHS with input from the Co-Neutrals, are intended to help DHS increase the focus and pace of its efforts to achieve progress in those performance areas that are trending negatively or are not improving at a significant rate at this late point in the reform.

⁷ The Phase I Core Strategy to achieve permanency for children who are legally free living in an identified adoptive placement was one of DHS' strategies to reduce caseloads by decreasing the number of children in DHS custody.

⁸ DHS reformatted its Phase I and Phase II Core Strategies into a combined document that is now titled "Core Strategies SFY16." The reformatted version is reflected in Appendix C.

VI. Seven Performance Categories: Assessment of Progress and Good Faith Efforts

In this section, as required by the CSA, the Co-Neutrals review the seven performance categories under the CSA, providing commentary on DHS' overall progress and its efforts to achieve substantial and sustained progress toward each Target Outcome. As described in Table 1 (Summary of Target Outcomes and Good Faith Efforts) and Appendix A, not all performance categories and their corresponding metrics have a Target Outcome that was due before the end of this reporting period (through June 30, 2015).

A. Foster Care and Therapeutic Foster Care Homes

DHS committed in the Pinnacle Plan to develop a robust and diverse pool of foster homes, traditional and therapeutic (TFC), sufficient to achieve sustained positive outcomes for children, including reduced shelter use, increased safety, placement stability and timely permanency for children and youth in custody. Specifically, the Pinnacle Plan provides:

“OKDHS must have an **adequate number of resource parents**. OKDHS has not been able to meet this need in the past, but that is going to change. Improvement in this area is critical and addresses many of the 15 performance areas. If **every child has the right resource family**, a reduction in abuse and neglect in care, placement instability, shelter care utilization, failed adoptions, and older youth aging out of the system without a permanent family will be achieved.”

For three consecutive state fiscal years beginning in SFY13, DHS has worked to increase the number of foster and TFC homes in Oklahoma. Each year, DHS sets targets to develop new foster and TFC homes seeking to attain a substantial net gain in the pool of available family-based placements.

As noted in previous reports by the Co-Neutrals, DHS did not meet its annual foster home targets for SFY13⁹ and SFY14. Starting in SFY14, DHS transitioned to a public-private foster care system in an effort to build the capacity to develop and support Oklahoma's traditional foster homes. During SFY15, DHS expanded its agency partnerships to build additional capacity. DHS also implemented a set of core strategies designed, in part, to help DHS analyze system barriers that impede the successful and timely development of new foster and TFC homes and to implement solutions to improve performance.

For SFY15, DHS' target to develop new non-kin foster homes was 904 and DHS approved a total of 780 new homes, 86 percent of the annual target, and 16 more homes than it approved in

⁹ The Co-Neutrals could not verify that DHS achieved the SFY13 foster home target.

SFY14. The SFY15 target for TFC homes was 150 and DHS approved a total of 122 new TFC homes, 81 percent of the annual target, and 11 more homes than it approved in SFY 14.

Changes from DHS' Initially Reported New Homes Data

DHS reported throughout the year in its monthly public reports and in its SFY15 annual data that DHS had developed a total of 831 new non-kin foster homes and 137 new TFC homes. The Co-Neutrals reviewed DHS' detailed data and found that 43 of the 831 homes were designated as respite-only and 32 were identified as poor prognosis homes. DHS reports that with a recent change to its KIDS system, the agency was able to identify for the first time respite homes in its data of open foster home resources. Respite homes are important resources for foster parents and children. However, respite homes are not established to provide stable ongoing placements for children and were never contemplated to be counted as new foster homes. Accordingly, the Co-Neutrals removed respite-only homes from the new home count, thereby reducing the total number of new SFY15 homes to 788.¹⁰ In addition, DHS reported 15 new TFC homes that were designated as respite-only, and so the Co-Neutrals reduced the total number of new TFC homes to 122.

With respect to poor prognosis homes, the Co-Neutrals, as reported in the October 2014 Commentary, revised the SFY15 "Criteria for Counting New Non-Kin Foster and TFC Homes" and specified that homes designated as poor prognosis do not count toward the annual foster home target. During verification discussions leading to the publication of this report, DHS leadership asked the Co-Neutrals to include these poor prognosis homes in the total count, and in doing so, provided various explanations for the use and purpose of poor prognosis homes. The Co-Neutrals agreed to allow DHS to include in its count of new SFY15 homes any of the 32 new poor prognosis homes that DHS could verify were appropriately converted from adoption home status,^{11, 12} and have accepted the placement of a foster child. DHS certified that 24 of the 32

¹⁰ The Co-Neutrals also urged DHS to review all respite-only designated homes in their system because of the very high vacancy rate in these homes, including long-standing (more than three months) vacancies. DHS' data indicates that the vast majority of these homes are not being used to support foster parents as a respite resource.

¹¹ DHS agreed to implement a thoughtful process to convert both adoption and kinship homes to traditional foster homes to ensure that the families involved have a clear understanding of the expectations of the home as an approved and available non-kin foster home. DHS agreed to maintain in each converted foster home's file a specific record signed by the foster parent(s) and a DHS supervisor certifying that the family was informed of the expectations regarding foster parenting. The Co-Neutrals have revised the SFY16 criteria for counting new non-kin homes to allow the count of converted homes (kinship or adoption conversions) only if DHS can certify that a thorough conversion was completed and that the home is accepting the placement of foster children.

¹² DHS recently notified the Co-Neutrals that it will not open any poor prognosis homes in SFY16.

poor prognosis homes met these criteria. DHS could not certify eight homes, which further reduced DHS' total count of new SFY15 foster homes developed to 780.¹³

SFY15 - Foster Home Targets and Performance¹⁴

The CSA requires that targets are established each year for the number of new foster homes developed for children in DHS custody. Under the CSA, the Co-Neutrals are authorized to verify and confirm a baseline of available homes and to establish DHS' performance targets. In July 2014, after reviewing extensive information and data in the context of multiple discussions with DHS leadership, the Co-Neutrals established the SFY15 (July 1, 2014-June 30, 2015) foster home target at 904 new non-kin foster homes. A net-gain foster home target for this same period was established at 356 homes.

In November 2014, the Co-Neutrals set an interim target for the year, in order to better track DHS' progress to meet the annual target. The Co-Neutrals established an interim target for DHS to develop 678 new non-kin foster homes by March 31, 2015.¹⁵ DHS developed 569 new foster homes by March 31, 2015, 84 percent of the interim target.

During the first half of SFY15, DHS' data shows two peak performance months with 83 new homes approved in October 2014 and 104 in December 2014, for a total of 409 new non-kin foster homes approved by December 31, 2014 - almost 45 percent of the annual target of 904 homes. This represented a pace that conceivably placed DHS within reach of the final annual target of 904 homes; DHS needed to develop an average of 83 new homes in each of the following six months to reach the target. However, DHS did not sustain this level of progress and output in the following months.

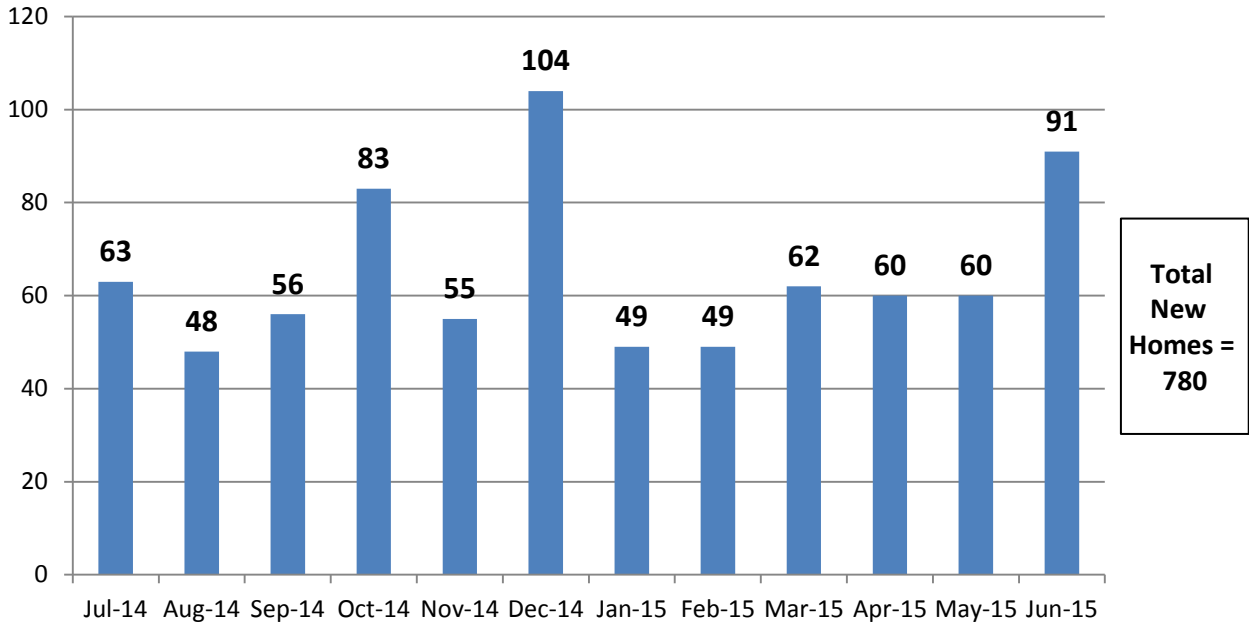
From January through May 2015, DHS approved an average of 56 new homes each month, and had one final peak month in June 2015 when it approved 91 new homes. DHS' final SFY15 outcome of 780 new non-kin foster homes is 124 fewer homes than the established target.

¹³ DHS did not report any new TFC homes that are designated as poor prognosis homes. The total count of new TFC homes for SFY15 was adjusted to remove only those TFC homes designated as respite-only.

¹⁴ The foster and TFC home performance data the Co-Neutrals include in this commentary has been adjusted and corrected to remove any uncountable homes (respite-only and uncertified poor prognosis homes).

¹⁵ DHS now includes in its monthly public reports the agency's progress in meeting all foster home targets set: annual, net gain and interim.

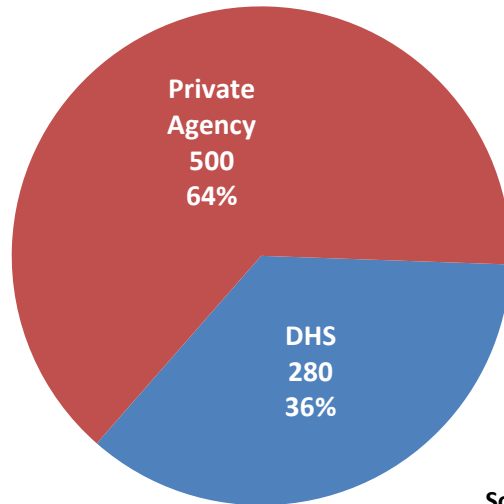
Figure 4: New Foster Care Homes Developed by Month, July 2014-June 2015



Source: DHS Data

In SFY15, the private foster care agencies approved 500 new homes (64 percent), and DHS approved 280 new homes (36 percent). In SFY14, when the private agencies started their work under DHS’ new foster home contracts, the private agencies developed 35 percent of the new homes and DHS developed 61 percent. Since then, the balance has shifted with DHS’ partner agencies developing the majority of the new foster homes during SFY15.

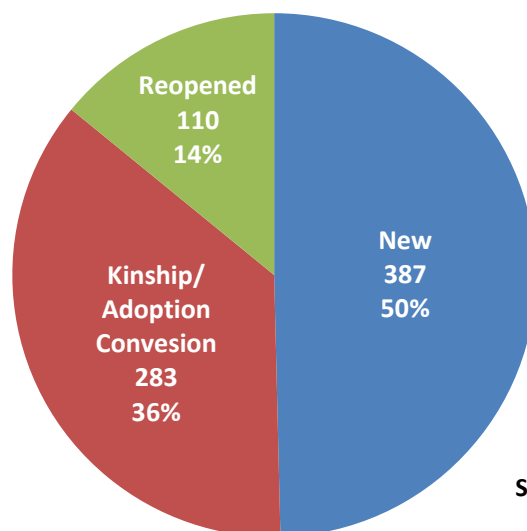
Figure 5: SFY15 New Foster Homes Developed by Agency (Total=780)



Source: DHS Data

Of the 780 foster homes approved during SFY15, 387 families (50 percent) were newly recruited by DHS and the private agencies, 283 homes (36 percent) were already approved by DHS as adoption or kinship homes and were then converted to traditional foster homes, and 110 (14 percent) were DHS resource homes¹⁶ that were closed for more than a year and reopened during SFY15.

Figure 6: SFY15 New Foster Homes by Type (Total=780)



Source: DHS Data

During the past three years, DHS has converted many adoptive and kinship homes to foster homes as an integral strategy to increase its pool of traditional foster homes. While it makes sense for DHS to do so, the Co-Neutrals have discussed with DHS on multiple occasions that their experience has shown that child welfare systems can operate more efficiently when foster care and adoptive families are recruited, approved and managed together, rather than in separate systems, as is the current process in Oklahoma. This integrated practice, known as a resource family model, allows agencies to guide and support families from their initial inquiry through the end of the home approval process, without the family having to declare an interest in foster care or adoption only. Resource family models create efficiencies for agencies to recruit families together and to match children to the best possible resource, regardless of the door the family entered when they initially contacted the agency.

DHS operates two systems that manage their adoption and foster homes separately. The Co-Neutrals have discussed with DHS leadership that this bifurcated system appears to be inefficient in Oklahoma. For example, DHS reports it has adoption caseworkers assigned to manage hundreds of adoptive homes that are vacant, yet DHS requires that adoption workers

¹⁶ DHS resource homes that are reopened could have been previously approved as a number of different types of DHS resources, including traditional, kinship, emergency foster care, TFC and DDSD homes.

make quarterly visits and conduct annual reassessments of these families. At the same time, any of these homes that convert to foster home status have an additional caseworker from the foster care unit who is assigned to manage the same home.

Through its core strategies, DHS leadership recently committed to explore the integration of its adoption and foster home recruitment and support programs. The Co-Neutrals urge DHS to evaluate any existing operational structures and practices that impede DHS' goals and to implement changes designed to increase the number of placements available for children.

SFY15 - Net Gain Target and Performance

The Co-Neutrals established the net gain Target Outcome of 356 foster homes in SFY15. DHS' data shows a starting baseline of 1,681 open and countable non-kin foster homes on July 1, 2014 and 1,858 countable foster homes open on July 1, 2015, resulting in a final net gain of 177 homes for the year, which is 50 percent of the net gain target.

During this annual report period (SFY15), DHS data shows that 572 of the 1,681 homes open at the beginning of the year closed by the end SFY15 for a 34 percent closure rate. In addition, 85 of the 780 homes newly approved in SFY15 closed before the end of the year for an 11 percent closure rate of new homes.

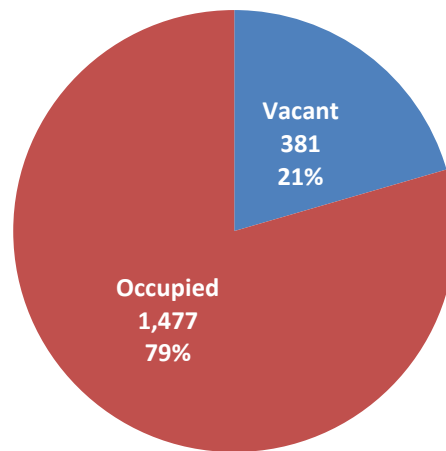
Vacant Foster Homes – Rates and Duration

DHS previously reported that 2,139 foster homes were open on January 1, 2015 and that 1,535 (72 percent) of these homes were occupied and 604 (28 percent) were vacant.¹⁷ DHS' data

¹⁷ As the Co-Neutrals were finalizing their April 2015 Commentary, DHS presented new baseline data for July 1, 2014 and January 1, 2015 after removing 149 contracted homes previously listed as open foster homes in one or both baselines. DHS originally reported and the Co-Neutrals included in the April 2015 Commentary that 1,907 non-kin, countable foster homes were open on July 1, 2014 and 2,139 homes were open January 1, 2015 (mid SFY15 baseline). The Co-Neutrals had raised questions about the January 1, 2015 baseline data showing 604 homes (28 percent) as vacant, some for more than one year. In reviewing the vacant homes, DHS identified that 149 foster homes labeled as contracted foster homes should be removed from the list of open and countable resources. These contracted homes are considered companion homes, in which new placements/beds are made available to siblings of a child already placed in the same home approved as a TFC. These contracted homes were previously included in the criteria of countable non-kin foster homes as they were considered to be open and available to any child who may need the placement. However, these companion homes were established only to accommodate specific children (siblings) and not to remain available indefinitely to other children. As such, DHS appropriately removed these homes from the count of open, countable or available homes. The Co-Neutrals' SFY16 updated foster home criteria specified that contracted foster homes are not considered a type of countable home in the baselines or towards the target of newly developed homes. (See Appendix D) DHS has informed the Co-Neutrals that it plans to continue using these contracted TFC companion homes not only for sibling placements but also to step down a TFC-placed child to a traditional placement (the companion home placement) in order to maintain the child in the same TFC home. The Co-Neutrals consider this good practice.

further showed that of the 604 foster homes vacant on January 1, 2015, 152 (25 percent) had been vacant at least six months, and 41 homes (seven percent) had been vacant over one year. The Co-Neutrals commented that the length of time these foster homes were vacant raises questions and concerns as it is widely acknowledged that there is not a sufficient pool of foster homes. During the current reporting period, DHS data shows that of all 1,858 non-kin foster homes listed as open on July 1, 2015, 381 (21 percent) were vacant, a significant improvement from the previous report period.

Figure 7: Occupancy Rate of Foster Homes (Total=1,858)



Source: DHS Data

Table 2 below shows the length of time these 381 homes remained vacant without any children in DHS custody placed. Ninety-four (25 percent) of these 381 homes had been vacant for at least three months and 43 were vacant at least six months. This shows significant improvement from the previous reporting period when 152 homes were vacant for at least six months. Given the substantial need for additional foster homes in Oklahoma, DHS will need to continue to track closely foster homes that are vacant, so that the progress DHS made during the current period continues.

Table 2: Status of Vacant Foster Homes - July 1, 2015¹⁸

Home Status	No.	Percent
Vacant 1-30 days	167	43.8%
Vacant 31-90 days	120	31.5%
Vacant 91-182 days	51	13.4%
Vacant 6 months - 1 year	36	9.4%
Vacant 1 year or more	7	1.8%
Total Vacant	381	100.0%¹⁹

Foster Home – Remediation Plan and Core Strategies

In November 2014, the Co-Neutrals issued a remedial order directing DHS to undertake and maintain diagnostic and remedial activities, finding that after two and a half years into the reform effort, DHS had not made substantial and sustained progress to meet the foster care Target Outcomes. In addition to requiring DHS leadership’s focused attention to identify barriers that may be preventing DHS from meeting the foster home Target Outcomes, DHS was required to develop a remediation plan with focused core strategies to increase its pool of foster homes and achieve the Target Outcomes set for SFY15 and beyond. DHS was also required to submit to the Co-Neutrals monthly progress reports regarding DHS’ efforts to implement the remediation and core strategies plan which the Co-Neutrals conditionally approved on February 6, 2015 and finally approved on March 10, 2015.

Expand Contracts with Private Agencies

Under its core strategies plan to grow its recruitment and licensing capacity, DHS expanded its contract with St. Francis,²⁰ one of the four agencies awarded a contract under the public-private partnership established in August 2013. St. Francis was originally contracted to develop and support traditional foster homes in Regions 3 and 5 only. In February 2015, DHS expanded St. Francis’ contract to include Regions 2 and 4 and projected that by June 30, 2015 an additional 14 homes would be developed in each of these regions. As of June 30, St. Francis had approved an additional 11 homes – six in Region 2 and five homes in Region 4.

¹⁸ Twenty-one vacant foster homes were jointly approved as another type of resource (adoption, DDSD, etc) and were occupied by children in those resource types on July 1, 2015.

¹⁹ Percentages do not add up to 100 due to rounding.

²⁰ St. Francis already had established contracts with DHS to develop and support TFCs. DHS’ remediation plan originally planned for expanded contracts with Angels (another agency with existing foster home contracts) but later removed Angels from the plan for expanded contracts.

DHS also established new contracts to develop foster homes with the Oklahoma Association of Youth Services (OAYS) agencies, with contracts for Regions 1, 2 and 4 in place on March 1, 2015. DHS advised the Co-Neutrals that it worked with the OAYS agencies to project the number of homes that could be developed by June 30, 2015 and set a target of 109 new foster homes. The OAYS agreed to develop 51 homes in Region 1, 30 homes in Region 2 and 28 homes in Region 4. However, as of June 30, 2015, the OAYS agencies had approved only three homes and reported 12 additional homes in the pipeline. DHS established new contracts with OAYS agencies in Regions 3 and 5 on May 15, 2015, but given the later start date of these contracts DHS did not project that any homes would be developed in these regions during SFY15.

The OAYS comprises community-based agencies that provide services, including shelter, to many children and youth also served by DHS. DHS advised the Co-Neutrals that it plans for the OAYS agencies to develop foster homes for youth in the OAYS shelters, so that there is continuity of care for youth and so that youth can be moved timely from shelters to foster homes and remain close to their families and communities of origin.

The Co-Neutrals met with both DHS and OAYS leadership to discuss performance in the reporting period. Both the OAYS and DHS believe that the OAYS agencies have the ability to grow capacity to meet the targets set by DHS for SFY16. The Co-Neutrals expect that DHS leadership will carefully monitor performance, as OAYS contract expansion was the core capacity building strategy included in DHS' remediation plan.

DHS reported to the Co-Neutrals that in order to further increase foster home capacity, it contracted, late in this report period, with seven TFC provider agencies to develop foster homes in addition to TFC homes. DHS leadership also reported that it will assess DHS' internal staff capacity to develop foster homes and will allocate additional resources as necessary to achieve the goals that have been set for SFY16. The Co-Neutrals will assess DHS' implementation of these core strategies in the next commentary report.

Identifying Barriers, Developing Solutions, Building Capacity

DHS committed to hold weekly calls with each of its partner agencies to resolve any barriers (case specific barriers as well as any trending or systemic impediments) that confront prospective foster homes in the approval pipeline. DHS and the private agencies reported to the Co-Neutrals that these calls have been conducted regularly and have been helpful to identify and resolve specific concerns in a timely manner.

DHS also established a barrier buster workgroup consisting of DHS staff, private agency staff, tribal partners and private consultants, who began work in October 2014 to identify and resolve barriers to timely foster home approval. In June 2015, DHS reported that many barriers had been resolved and the workgroup was placed on standby to address additional systemic barriers as they are identified. DHS reported that the workgroup was able to provide clearer guidance to applicants on the steps and requirements to become an approved home; decided to allow an applicant's home study to proceed while they obtained an Oklahoma driver's license; clarified with staff that applicants who are legally separated can become foster parents when previously these applicants were denied based on their marital status; and continued to streamline the fingerprinting process and expand the use of electronic fingerprints which can be processed in days rather than weeks. The workgroup was also charged with identifying areas where existing foster parents need additional support. The workgroup identified delayed travel reimbursements for foster parents as an issue to resolve. DHS reported that, through the workgroup's efforts, solutions were created and foster parent reimbursements are now received in 14 days, on average, rather than what had previously taken months.

Throughout the report period, DHS continued to develop a statewide recruitment plan, which includes a number of strategies to recruit new homes, including the assignment of a DHS staff person in each region to serve as a regional recruitment coordinator. The recruitment coordinators serve as liaisons to the private agencies/subcontractors and are charged to support targeted and coordinated recruitment. DHS reported that the coordinated work of the private agencies and the DHS liaisons is a work in progress and will be ongoing.

DHS outlined in its statewide recruitment plan strategies that have only recently reached the implementation phase – some not until after the conclusion of this report period. For example, DHS relieved some foster care staff of their caseloads so they can recruit families and help them through the approval process; DHS hired additional temporary staff to further support recruitment in each region; and DHS produced and distributed new recruitment campaign materials.

DHS completed its plan to contact previous foster families that closed in good standing within the last two years, as well as families who inquired about participating in DHS' "Home for the Holidays"²¹ program to determine those families' interest in fostering. Unfortunately, DHS reported that despite placing 156 calls to former foster families and 760 families who showed interest in DHS' holiday program, only one of these families is now serving as a foster family.

²¹ DHS' Home for the Holidays program encourages families to host at their homes during the Christmas holiday children who are living in a shelter.

During the report period DHS began discussions with the resource family partner agencies regarding modifications to the current foster home contracts. DHS reports that contract modifications will be completed in October 2015 and will include requirements for targeted recruitment during SFY16.

Good Faith Efforts

DHS has acknowledged that foster home recruitment continues to be a challenge. In SFY13 DHS reported it approved 796²² new foster homes, in SFY14 DHS approved 764 new foster homes and in SFY15 DHS approved 780 new foster homes. As a result of three years of relatively flat performance, DHS has not built a sufficient pool of foster homes and children remain placed in shelters, maltreatment in care rates are high and timely permanency has been elusive. These negative outcomes all correlate to the lack of safe family based placements.

However, under the current DHS foster care leadership team, the Co-Neutrals have observed focused attention and the willingness to identify and address long-standing or ongoing practices that do not support DHS' foster home development goals. And during this report period DHS planned, developed and implemented a set of core strategies to build the capacity to recruit, support and retain many more foster families. While early implementation of the core strategies has not yet resulted in a sufficient pool of safe foster homes, DHS has worked diligently during the reporting period to put in place the conditions for substantial progress to be achieved in the next year of the reform effort. After extensive deliberations regarding the activities and decisions made by DHS leadership in the period under review, the Co-Neutrals find that while substantial and sustained progress has not been achieved, DHS has made good faith efforts to achieve substantial and sustained progress toward the foster home Target Outcomes during the report period.

To support a more regular examination of progress, the Co-Neutrals have established new foster home interim targets in SFY16. Further, the Co-Neutrals recently requested that DHS update its core strategies to ensure that the issues confronting DHS are timely and adequately addressed. In order to make a good faith determination in the next report period, the Co-Neutrals will evaluate DHS' work to manage and implement its core strategies, to timely track the effectiveness of these strategies and, as necessary, to act swiftly and decisively to employ alternative or additional strategies so that substantial progress toward the Target Outcomes is made.

²² In SFY13 DHS reported that it approved 796 new foster homes. Due to some data quality issues the Co-Neutrals were unable to verify this number.

SFY16 - Foster Home Targets and Core Strategies

DHS proposed and the Co-Neutrals accepted a SFY16 target of 1,054 new non-kin foster homes. DHS plans to internally recruit, develop and manage 234 new foster homes while also relying on its partner agencies to develop 820 (78 percent) of the new home target for SFY16. DHS must have in place both the management and staff capacity to recruit and develop homes and DHS has set the following SFY16 targets with the private agencies:

- Angels Foster Family Network 103 new homes
- OAYS 140 new homes
- St. Francis Community Services 200 new homes
- Tallgrass Family Services-DCCCA 213 new homes
- TFI 164 new homes
- Total 820 new homes**

The Co-Neutrals have set the following interim foster home targets:

- December 31, 2015 527 new homes
- March 31, 2016 790 new homes
- June 30, 2016 1,054 new homes

Finally, the Co-Neutrals have set the SFY16 net gain foster home target at 534 homes.

Therapeutic Foster Care

DHS agreed to increase the number of therapeutic foster care (TFC) homes available to meet the needs of children in its custody. Children who are assessed to have behavioral health needs and who can live in the community with specially trained foster parents are eligible to be placed in TFC homes. DHS committed to develop a sufficient pool of TFC homes within its continuum of available placement settings in order to: avoid unnecessarily placing children in higher levels of congregate care; step-down children from higher levels of care; ensure that appropriate services are provided for children in need of behavioral health treatment; and, support more stable placements.

In July 2014, DHS submitted to the Co-Neutrals its proposal for a SFY15 target of 150 new TFC homes. DHS reported that it had analyzed its TFC home data and the list of children waiting for TFC placements and identified the need for an additional 196 new TFC homes statewide. The proposed target of 150 new TFC homes represented around 75 percent of the identified,

additional need. The Co-Neutrals accepted DHS' proposal and established the SFY15 target at 150 new TFC homes which, if met, would be a 35 percent performance improvement over SFY14 when DHS developed 111 new TFC homes. The Co-Neutrals also established a net gain target of 56 TFC homes for SFY15.

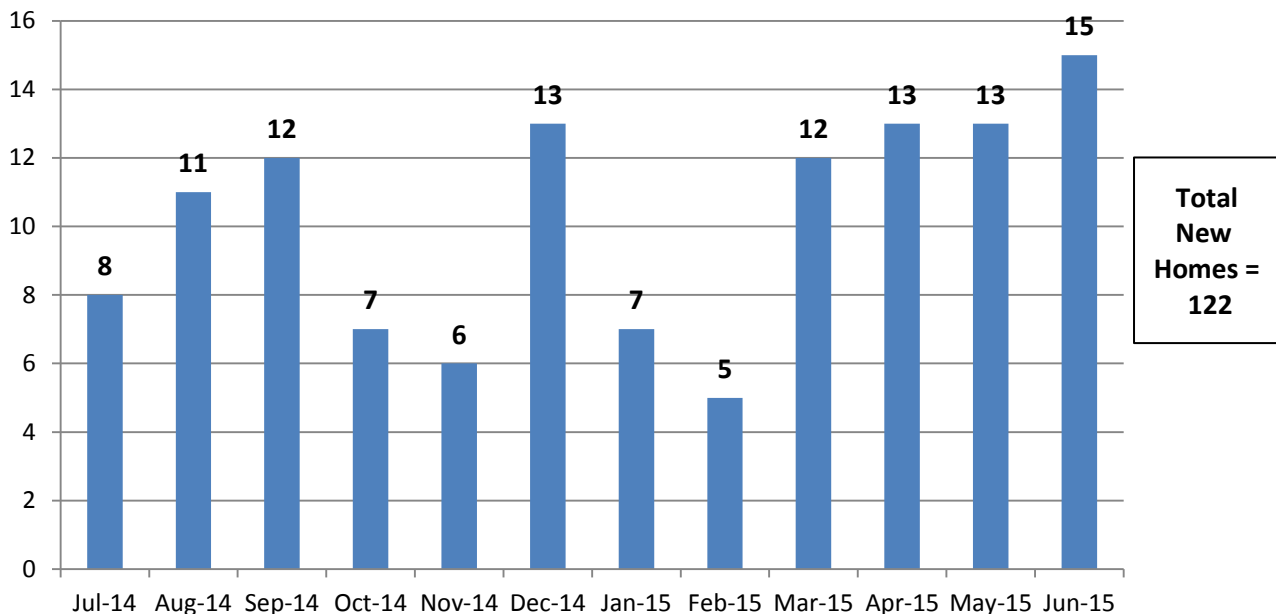
SFY15 TFC New Home Development

DHS reported that it had developed 137 new TFC homes during SFY15. This number was reduced to 122 homes (81 percent of the target) after the Co-Neutrals analyzed DHS' data and removed 15 TFC homes DHS reported as new but designated as respite-only homes. As a result, DHS developed 28 fewer homes than required to meet its SFY15 target of 150 new TFC homes. DHS reported a net gain of 27 TFC homes after comparing DHS' starting and ending baselines for SFY15. The total net gain for TFC homes was reduced to 23 homes, 41 percent of the net gain target of 56 TFC homes set for SFY15.

During SFY15, DHS data also shows that 99 of the 414 TFC homes open at the beginning of the year closed by the end of the period for a 24 percent closure rate. In addition, 10 of the 122 homes newly approved in SFY15 closed before the end of the year for an eight percent closure rate of new homes.

In approving 11 more TFC homes in SFY15 than in SFY14, DHS demonstrated positive trending, but not substantial progress, and in fact missed the Target Outcome again. Moreover, with a net loss of 56 TFC homes during SFY14, followed by a net gain of only 23 TFC homes in SFY15, there were fewer TFC homes available for children and youth at the end this report period than two years earlier.

Figure 8: New Therapeutic Foster Homes by Month, July 2014-June 2015

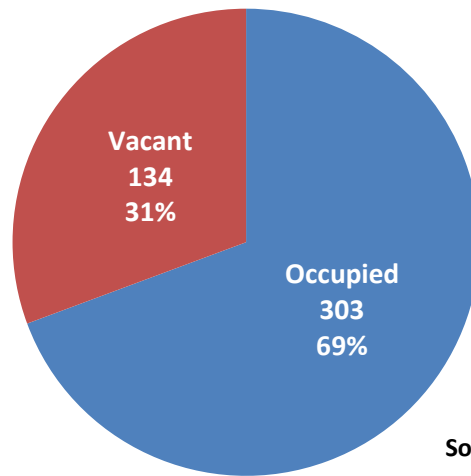


Source: DHS Data

DHS originally reported that 498 TFC countable homes were open on July 1, 2015: 61 of these homes were respite-only, and when these homes were removed from the count the ending baseline was reduced to 437 TFC homes. Of the 61 respite-only TFC homes DHS had shown as open on July 1, 2015, 54 (89 percent) were vacant and 45 of these vacant homes had no child placed in them for at least three months. Nineteen of the 54 vacant TFCs had no children placed in them from six months to a year and 16 had been vacant for at least one year. In summary, the 61 respite-only homes that DHS included in its count of open TFC homes were not viable resources for children. Removing these homes from the count of open TFC homes provides a more accurate picture of DHS' TFC bed capacity and underscores the need for DHS to develop additional TFC resources to eliminate the child waiting lists and to best match children to TFC families.

Of the 437 open TFC homes on July 1, 2015, 134 (31 percent) were vacant on July 1, 2015. Of the 134 vacant homes, 59 (44 percent) were vacant for at least three months.

Figure 9: Occupancy Rate of TFC Homes (Total=437)



Source: DHS Data

Table 3: Status of Vacant TFC Homes - July 1, 2015²³

Home Status	No.	Percent
Vacant 1-30 days	43	32.1%
Vacant 31-90 days	32	23.9%
Vacant 91-182 days	25	18.7%
Vacant 6 months - 1 year	20	15.0%
Vacant 1 year or more	14	10.4%
Total Vacant	134	100.0%²⁴

TFC homes are DHS’ primary family-based resource to care for children with behavioral or other special needs in order to keep these children living in communities while they receive the treatment that they have been assessed to need. In the first report issued in October 2013 and in every report since then, the Co-Neutrals have highlighted clear deficiencies in how DHS is working with its private agency partners to manage and utilize Oklahoma’s TFC resources. Each year, DHS has acknowledged that there is a large list of children waiting for and in need of TFC homes. Many of these children are living in shelters and other congregate settings that are not appropriate for their level of need. Most recently, DHS identified that at least 124 children are in need of and waiting for a TFC placement. The waiting lists are compounded by unacceptably high vacancy rates in TFC homes that are categorized as open and available.

²³ Twenty-two vacant TFC homes were jointly approved as another type of resource (adoption, DDS, etc.) and were occupied by children in those resource types on July 1, 2015.

²⁴ Percentages do not add up to 100 due to rounding.

In addition, the child placement process related to TFCs continues to be a problem. The Co-Neutrals have documented over several reports the long waits for TFCs among children who are housed in shelters. The Co-Neutrals identified barriers and a lack of consistent understanding regarding the standards that allow children or youth to qualify for a TFC placement. Further, the Co-Neutrals have highlighted the number of disruptions that occurred for children and youth placed in TFCs who end up in the public shelters. Some of the more notable incidents that occurred at the public shelters (that contributed to DHS' decision to close its public shelters) have involved children who were waiting for a TFC placement and were being cared for by staff not trained to care for children with special needs. Overall, the placement process for TFCs remains often disconnected from the placement needs of children, and, at least at this point, not standardized or easy to navigate for staff. DHS made inadequate efforts to address all of these concerns during the report period.

TFC – Core Strategies

During the second half of 2015, DHS began to work collaboratively with its TFC partner agencies to develop new performance based contracts. These contract enhancements are designed to strengthen agency accountability and performance. The new contracts also provide financial incentives to TFC homes and agencies that facilitate the placement of special needs children who are at times the most difficult to place. Five performance metrics are embedded in the new contracts to promote better outcomes including placement stability and the placement of children with higher level needs. DHS reports that these contracts went into effect just after the conclusion of this report period.

The Co-Neutrals urged DHS to develop a set of focused strategies regarding its TFC practice. DHS developed a core strategy plan late in this report period. The plan includes strategies to: establish a regular process for DHS and the TFC agencies to review together existing homes to assess availability and use; regularly track and update the waiting lists to make timely and best matched placements when possible; ensure DHS' TFC home data and waiting lists are accurate; share data regarding current and trending characteristics of children needing TFC placements; more rigorously assess homes vacant more than 30 days to determine if they should remain open; and, ensure DHS and TFC agency staff are clear about their roles and responsibilities to implement these core strategies. DHS set a schedule to begin these core strategies on July 1, 2015, after the conclusion of the current report period.

The Co-Neutrals will evaluate DHS' efforts to implement the TFC core strategy plan in future commentaries, as well as DHS' efforts to address the many barriers related to placing children

and youth in TFCs. During this report period, however, DHS did not take timely action to resolve well known systemic problems in the TFC program. As such, the Co-Neutrals conclude for this report period that DHS did not make good faith efforts to achieve substantial and sustained progress to achieve the TFC Target Outcomes.

SFY16 Target – New TFC Homes

DHS proposed and the Co-Neutrals approved a target of 172 new TFC homes for SFY16. If DHS is able to approve 172 new TFCs over this 12-month period, it will be the largest number of TFC homes developed in a single year during this reform and 50 more homes than DHS developed in SFY15. The Co-Neutrals have established interim targets to maintain focus on the number of homes developed by DHS throughout the year and have established a net gain target of 81 TFC homes for SFY16.

Needs Assessment

Each year, DHS is required to propose to the Co-Neutrals its targets for developing new traditional non-kin and TFC homes for the coming fiscal year. DHS also is required, in part, to base the proposed targets on an analysis of children currently, as well as projected to be, in the state's legal custody to compare the number of additional traditional as well as TFC homes it will need to best serve children the following year. This analysis requires that DHS have an accurate understanding of its existing pool of homes that are open, available and willing to accept placements and the number and types of homes (targeted demographically, i.e., willing to accept siblings, and geographically) needed to appropriately best match children to these homes.

Over the last two years, DHS has increasingly worked to utilize data when proposing annual foster home and TFC targets. However, DHS' analyses to date have been based more on historical performance and DHS' capacity to develop homes rather than a full analysis of placement needs for children in custody that is independent of the agency's ability to meet the need in one given year. The Co-Neutrals agree that consideration must be given to DHS' actual capacity to develop new foster and TFC homes and have taken organizational capacity into consideration when setting annual targets. However, as DHS moves into the fifth year of this reform effort it is critical that DHS develop a comprehensive and data-driven assessment of placement needs for children in its custody. DHS will then be positioned to set annual targets each year that stretch the Department's capacity to make greater gains over time. The Co-Neutrals requested and DHS agreed to complete a comprehensive placement needs assessment by December 31, 2015.

B. Caseworker Caseloads and Supervisor Workloads

Child welfare caseworkers must have manageable caseloads to help Oklahoma’s most vulnerable children effectively; to investigate thoroughly calls accepted by the Hotline; to make sound screening and placement decisions; to develop individualized case plans for children and their families; to conduct family meetings and facilitate visitation between children, their parents and siblings; and to ensure timely permanency for children in placement. In other words, manageable caseloads are essential to child safety, well-being and permanency (either permanency with the child’s family of origin or a new family).

DHS committed to achieve the following manageable caseload standards for child welfare workers and workload standard for supervisors:

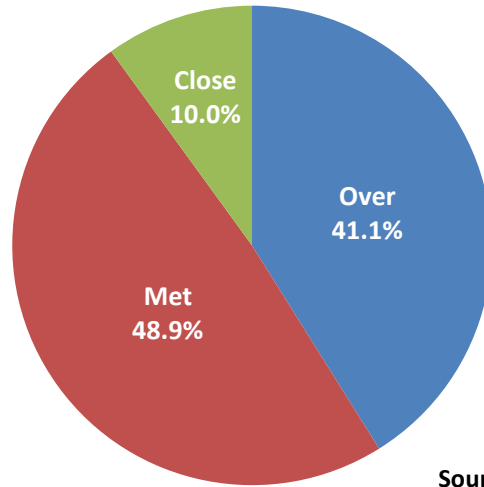
Table 4: Pinnacle Plan Caseload and Workload Standard Commitments

Role	Standards	Weight Per Case
CPS	12 Open Investigations or Assessments	0.0833
OCA	12 Open Investigations	0.0833
Family Centered Services	8 Families	0.125
Permanency Planning	15 Children	0.0667
Resource	22 Families	0.0455
Adoption	8 Families & 8 Children	0.0625
Supervisors	1 Supervisor Dedicated to 5 Workers	0.2 per worker

Performance – Target Outcomes

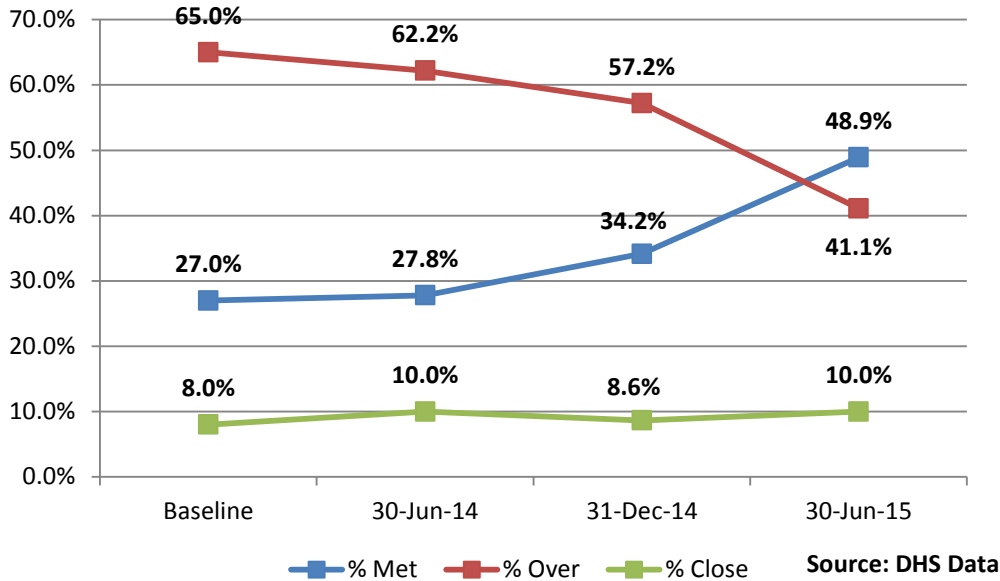
DHS committed to achieve a final target of 90 percent of caseworkers meeting their individual workload standards by June 30, 2014. DHS was insufficiently focused for the first two and a half years of this reform on achieving manageable caseloads and as a result did not make substantial and sustained progress during that time. Beginning in 2015, the Department’s leadership intensified its focus, planning and management, and as a result, DHS’ performance for these metrics has significantly improved over the last six months. During the most recent period, DHS consistently made good faith efforts to achieve substantial and sustained progress toward the caseload and supervisory workload Target Outcomes.

Figure 10: Workers Meeting Workload Standards, June 30, 2015



DHS reported that as of June 30, 2015, 48.9 percent of caseworkers met the established workload standard, with 10.0 percent of workers close to the standard and 41.1 percent over the workload standard. DHS' performance represents a substantial improvement from the last report period when 34.2 percent of caseworkers had individual workloads consistent with the agreed-upon standard as of December 31, 2014. An even more impressive increase is apparent since June 30, 2014, when only 27.8 percent of caseworkers had individual workloads consistent with the agreed-upon standard – a performance outcome level that was not significantly different from DHS' starting baseline of 27 percent.

Figure 11: Worker Caseloads: Percent of Workers Meeting Workload Standards



While DHS has significant work yet ahead, the steady improvement in caseload/workload performance over the last two report periods offers a positive indication that DHS’ workforce is beginning to stabilize. For the first time, DHS has reported a higher percentage of caseworkers meeting the standard than the total percentage of staff whose caseloads are over the standard. These gains did not come easily and are the result of a concerted effort by DHS leadership to make substantial progress.

Remedial Order and Core Strategies

In October 2014, DHS submitted quarterly data showing that as of September 30, 2014 only 26.6 percent of caseworkers met their caseload standard, which represented a performance outcome below DHS’ starting baseline of 27 percent. In response to the negative trending, the Co-Neutrals issued a Remedial Order on November 14, 2014 consistent with the parties’ CSA. The Remedial Order directed DHS to develop a staff tracking report that integrates key information, including current caseloads, number of workers needed to achieve 90 percent caseload compliance, number of caseworker positions allocated and filled in each district, number of vacant positions, and other relevant factors. This report is prepared and submitted weekly to the Co-Neutrals. The Co-Neutrals also required that DHS identify a set of “priority districts” with the greatest caseload challenges, vacant positions and staff turnover. Further, the Remedial Order directed DHS leadership to conference weekly with the directors of the priority districts to review their district’s data and progress, as well as challenges and barriers with caseloads, hiring and retention.

In response to the Remedial Order, DHS developed a comprehensive, data-informed, statewide hiring plan that projects DHS will reach 90 percent caseload compliance by the summer of 2016. The Co-Neutrals have observed DHS' progress in building its workforce capacity through a review of DHS' weekly reports of caseloads and positions (filled, vacant and posted). DHS authorized an additional 287 staff positions since December 2014 and has allocated a total of 2,118 case carrying staff positions (caseworker levels 2 and 3s) in order to reach the Target Outcome of 90 percent caseload compliance.

As of June 30, 2015, DHS reported 1,620 case carrying staff on board, an increase from December 31, 2014 when DHS reported a total of 1,450 case carrying staff. DHS' successful onboarding and retention work secured a net gain of 170 staff, which is important progress. In addition, 249 of the 1,620 case carrying staff on board as of June 30, 2015 were not yet eligible to carry a case as they were proceeding through CORE training as new caseworkers. This is an increase from the 207 of 1,450 case carrying staff on board on December 31, 2015 who were new trainees not yet eligible to carry a case. As such, DHS increased the number of staff who are in the pipeline and preparing to carry a full caseload.

Significant work remains for DHS to fill the additional 498 positions it has allocated in order to achieve 90 percent caseload compliance by the summer of 2016, and the Co-Neutrals' future judgments of DHS' work will continue to examine the agency's efforts to focus on, plan for and manage a comprehensive, data-informed, statewide hiring plan.

Also under the Remedial Order, DHS has been submitting monthly reports to the Co-Neutrals documenting DHS' progress in implementing graduated caseloads for new workers, a key retention strategy for new staff. DHS has struggled since the beginning of this reform effort to stem the tide of workers newly hired and trained leaving within their first year of work at DHS. Graduated caseloads provide new caseworkers time to transition into their position with only 25 percent of a caseload assigned to them for the first three months following their completing CORE training and passing the HOT comprehensive skills test. After three months of successful work with a 25 percent caseload, caseworkers then graduate to 50 percent of a caseload. Finally, caseworkers assume a full caseload at nine month which is three additional months of successful work with a 50 percent caseload.

Although DHS committed in the Pinnacle Plan to implement graduated caseloads as a key strategy to support and retain newly hired and trained caseworkers, DHS leadership did not systematically apply the practice of graduated caseloads until 2015. During the most recent period, DHS more than doubled the percentage of workers meeting a graduated caseload standard. At the close of this report period on June 30, 2015, 54 percent (153 staff) of the 285 new caseworkers who are eligible for graduated caseloads met the reduced graduated caseload standards compared to December 31, 2014 when just 23 percent (55 staff) of the 240 new staff

met graduated caseload standards. DHS reports that implementing graduated caseloads has had a significant impact on helping to retain a greater number of staff, new staff in particular.

DHS also reported significant progress in another core strategy to support retention, which is the mentor program that pairs new caseworkers with tenured caseworkers who provide guidance and mentoring in the field. In June 2015, DHS reported that 278 workers have been certified as field mentors compared to 186 workers in January 2015.

Under its Phase I Core Strategies²⁵ for caseloads, DHS committed to reduce the Child Protective Services (CPS) Investigations backlog in part as a strategy to reduce the number of these cases that have long added to DHS' high caseload burden. As of December 2014, DHS' CPS backlog still hovered around 1,128 cases. Following DHS' development and implementation of a plan designed not only to reduce but also prevent another CPS backlog increase, the number of CPS backlog cases has generally remained below 350, the agreed upon maximum target set by the Co-Neutrals and DHS under the Remedial Order.

Starting in April 2015, the Co-Neutrals also required DHS to begin counting within its caseload performance data all cases listed as pending to ensure DHS is keeping a close account – both quantitatively and qualitatively – of all case work. As of March 27, 2015, DHS reported it had approximately 3,200 children listed in 1,100 pending status. DHS explained that a primary contributing factor to the large number of pending cases had been the ongoing nature of a variety of administrative processes that otherwise prevented DHS from closing cases it deemed ready to be closed, which consisted mostly of CPS cases. By June 30, 2015, DHS reported that it had substantially reduced the number of pending cases from 1,100 to 655.

It is worth reiterating that early in the reform effort, the Co-Neutrals and DHS agreed to take an “all work counts” approach to counting caseloads so that all efforts of a caseworker related to a child or family on their caseload was captured by his or her case count. In the absence of this approach, it becomes difficult to determine a true accounting of casework. The Co-Neutrals will continue to review with DHS the issue of pending cases and, what if any, additional casework with a child or family is required before a pending case can be appropriately closed.

As required by the Remedial Order, DHS identified 10 priority districts within Oklahoma that had the highest needs for caseload improvement, as well as vacancy and turnover reduction. DHS' monthly hiring and retention reports document DHS' district-level efforts to increase hiring and retention in the priority districts. This includes scheduled interviews with new staff early in their tenure of managing cases to understand what stresses new caseworkers are

²⁵ The November 14, 2014 Remedial Order also required DHS to establish a plan to reduce substantially the CPS backlog.

experiencing that may lead them to resign so that additional support may be offered. DHS leadership is also continuing to hold weekly conference calls with the directors of the priority districts to review any barriers to hiring, onboarding, and retaining new staff with these discussions guided by current, updated data.

DHS determined that its standard, required processes for posting individual job announcements significantly delayed the review and hiring of interested and qualified applicants. DHS worked with their human resource offices to establish Multiple Continuous Announcements (MCA), which is a continuous job announcement for approved caseworker positions. DHS still has nearly 500 positions approved for filling, so an ongoing list of screened applicants is now readily shared rather than waiting for each job to be posted for a specific number of days before an applicant list is compiled and released for interview selections.

Through these thoughtful, targeted strategies, DHS has made significant progress, particularly in three of the priority districts (D7, D20 and D23) that now report over 90 percent of their positions are filled. DHS is continuing to monitor the other seven priority districts originally identified and has added new districts to the priority list to provide the same level of closely coordinated oversight and support.

In the last report, the Co-Neutrals stated that they would draw future judgments based in large part on an analysis of DHS' efforts to implement the hiring plan, including overcoming systemic barriers, proactively recruiting staff, improving retention and streamlining hiring processes. DHS' focused efforts to reduce the caseloads of its front line staff have yielded promising results thus far. While DHS still has a lot of work ahead to fill vacant positions and build on its retention strategies to continue to make substantial and sustained progress toward the Target Outcomes, the data clearly shows that DHS has made important progress. The Co-Neutrals are encouraged by DHS' work in this area and conclude that DHS has made good faith efforts to achieve substantial and sustained progress toward the caseload Target Outcome.

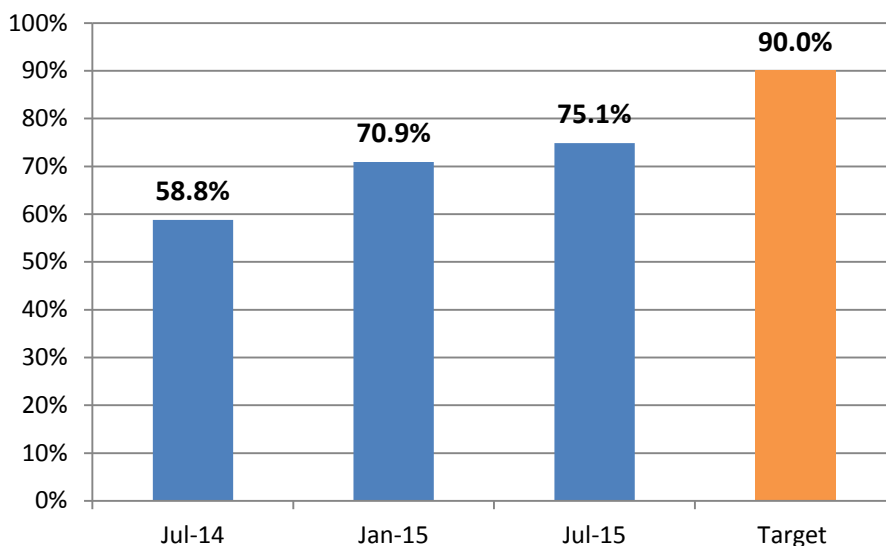
Performance Standards and Target Outcomes – Supervisor Workloads

DHS understands that good supervisory support for caseworkers, especially new caseworkers, is essential to supporting effective and consistent child welfare practice and positive outcomes for children and families. DHS committed to meeting the same target for supervisor workloads as it did for caseloads: 90 percent of supervisors meeting the 1:5 caseworker ratio by a final target date of June 30, 2014.

Although DHS has not achieved the target of 90 percent of supervisors meeting the 1:5 workload standard, DHS has continued to show substantial and sustained progress with the number of supervisors meeting the standard. As of June 30, 2015, DHS' data shows that 75.1 percent of supervisors met the 1:5 workload standard, compared to 70.9 percent on December

31, 2014, and just 58.8 percent on June 30, 2014. While DHS reported a slight decrease in the number of supervisors moving into the “close” range for meeting the standard (down to 15.4 percent from 18.0 percent), DHS reports a positive decline (11.1 percent down to 9.6 percent) for the percent of supervisors managing workloads over the standard.

Figure 12: Supervisors Workloads: Percent of Supervisors Meeting Workload Standards



Source: DHS Data

DHS also reported continued progress in decreasing the number of supervisors who are assigned and managing their own cases. Child welfare cases managed by supervisors carry the same case weight as the cases managed by caseworkers and are calculated into each supervisor’s workload ratio. As of June 30, 2015, only 27 supervisors carried more than two cases, substantially down from a year ago when 79 supervisors carried more than two cases, and continued progress from December 31, 2014 when 34 supervisors carried more than two cases. While important work remains to be done, both to meet the 90 percent Target Outcome of supervisor workload compliance and to further reduce the number of cases managed by supervisors, DHS is clearly making progress in this area. The Co-Neutrals again find that DHS has made good faith efforts to achieve substantial and sustained progress toward the Target Outcome for meeting supervisor workload standards.

C. Shelter Use

The CSA requires that DHS establish performance targets related to the placement of children in shelters (CSA Section 2.10). More specifically, DHS committed that it would “ensure all

children are cared for in family-like settings” and “stop its use of temporary placement in shelters for all children under 13 years of age.”

To support their review of DHS’ performance in this area, the Co-Neutrals engage regularly in a variety of activities including: visits and interviews at the Laura Dester and Pauline E. Mayer shelters; announced visits at private shelters; review of monthly outcomes data from DHS; and review of shelter authorization forms to understand why children are admitted to shelters and if reasonable efforts are made by DHS to identify a family-like placement before resorting to a shelter placement. During this review period, the Co-Neutrals focused on reviewing DHS’ efforts to implement core strategies to achieve substantial and sustained progress towards the shelter Target Outcomes.

Performance Standards

In the Metrics Plan, the Co-Neutrals selected the number of “child-nights” spent in shelters as the metric to assess Oklahoma’s progress in eliminating and reducing shelter use. One “child-night” is defined as “one child in a shelter at midnight.” The total number of child-nights is calculated by summing the number of children in shelters at midnight for each night of the reporting period. The Pinnacle Plan includes an exception for shelter placement if the child is part of a sibling set of four or more being placed together.²⁶ The Co-Neutrals have also allowed for the exception to place a minor parent with their child if necessary to keep the parent and child together (note that the child must in fact be placed with their minor parent). However, while the Co-Neutrals approved these exceptions, they are not automatic. For each child or youth in need of placement, reasonable efforts should be made to place the child in a family-like setting, regardless of whether the child meets an exception.

Performance for Children under Age Six, Shelter Metrics 5.1 and 5.2

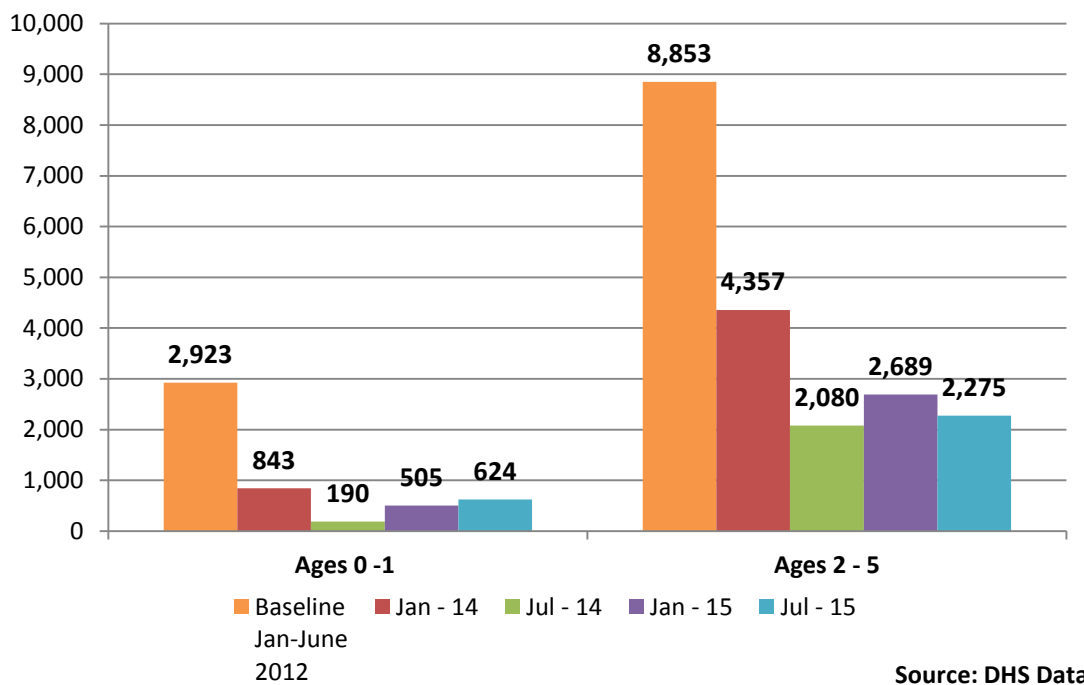
Although DHS has not reached the Target Outcome of zero child-nights in shelters for children under age six, it has sustained a substantial reduction in shelter-nights in comparison to the baseline of 2,923 child-nights for children under two years of age. For the current six month report period of January 1 through June 30, 2015, DHS identified 624 child-nights in shelters for children under two years of age, which represents 36 unique children. DHS reported that the shelter placements for 17 of these 36 children met an automatic exception. This represents an increase since the last six-month report period when DHS reported 505 child-nights and 33 unique children from this age group of zero to one. DHS will need to expand its resources and

²⁶ In June 2014, DHS requested and the Co-Neutrals approved that a set of three siblings, with all children being over six years old, could be considered - until April 1, 2015 - a large sibling group for the purposes of receiving an exception to place the siblings together in a shelter.

enhance its placement practices to ensure shelter stays for this youngest age group does not begin to trend negatively.

For children ages two to five, the original baseline recorded was 8,853 child-nights, and DHS' most recent data shows that number has dropped to 2,275 child-nights during this report period. These shelter nights represent 144 unique children, 57 of whom DHS reports met an automatic exception. In comparison to the last report period, DHS' data shows a decline in child-nights for this age group – down 414 child-nights from 2,689 in December 2014. Comparatively, the data also shows an increase in the number of children ages two to five who spent a child-night in a shelter, moving from 119 to 144 children.

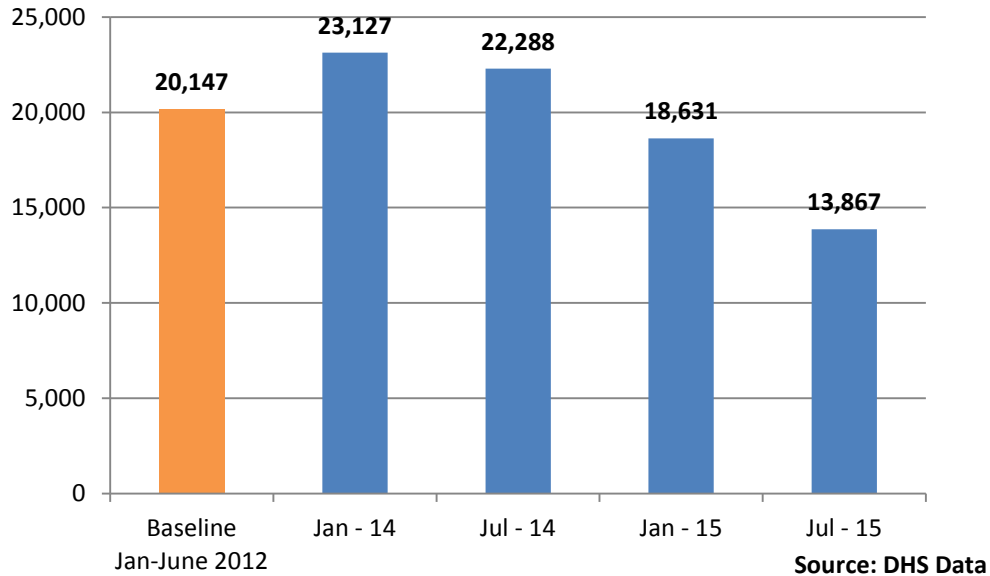
Figure 13: Metrics 5.1 and 5.2 – Shelter-Nights, Children Ages 0 - 5



Shelter Metric 5.3 – Children Ages Six to 12

For two straight report periods, DHS has shown substantial, positive declines in the number of child-nights in a shelter for children ages six to 12. During this report period, DHS reported 13,867 child-nights compared to 18,631 during the previous six-month period. These shelter nights represent 437 unique children down from 499. As shown in Figure 14 below, DHS has a great deal of work ahead to meet the Target Outcome of zero child-nights for this middle age group; however, DHS appears to be on a path of substantial and sustained progress toward the Target Outcome.

Figure 14: Metric 5.3 – Shelter-Nights, Children Ages 6 - 12

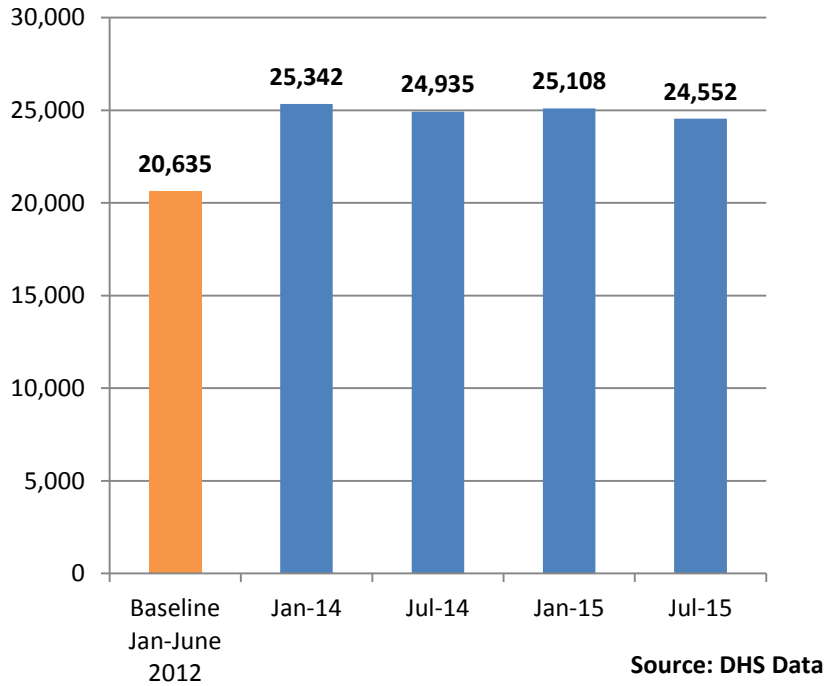


Shelter Metric 5.4 and Pinnacle Plan Commitment 1.17 – Youth 13 and Older

DHS’ Pinnacle Plan did not contemplate that shelter usage would be completely eliminated during the implementation of DHS’ reform efforts under the CSA. However, DHS did commit under the Pinnacle Plan (Point 1.17) that by June 30, 2014, children ages 13 and older would be placed in a shelter only if a family-like placement is not available to meet their needs; and further, DHS would not place any child in a shelter more than one time within a 12-month period and for no more than 30 days in any 12-month period. DHS also committed to reduce the number of shelter nights for this older age group to no more than 13,200 child-nights by June 30, 2015.

Figure 15 below shows how DHS has not made progress reducing the number of child-nights in a shelter for children ages 13 and older. For this report period, DHS reported 24,552 child-nights for this oldest group of children, which remains substantially above the starting baseline of 20,635 child-nights and well-above the target of 13,200 child-nights. While DHS reported a slight decrease in child-nights and unique children (560 reduced to 540) compared to the previous report period, the number of child-nights and children in shelters for this age group remains high.

Figure 15: Metric 5.4 – Shelter-Nights, Children Ages 13 and Older



During this six-month review period, DHS reported that its performance for Pinnacle Plan 1.17 is below the baseline period of January through June 2014. As presented in Table 5 below, the Co-Neutrals’ review of the data has found that DHS’ outcomes for ensuring teenagers do not experience multiple shelter stays or extended shelter stays beyond 30 days have worsened compared to the starting baseline period. DHS did experience a slight improvement against the last, interim period of July through December 2014, but the current outcomes reported show no substantial improvement over a one year period, and a worsening over a three year period.

DHS committed to a June 30, 2015 interim target²⁷ of ensuring 80 percent of children ages 13 and older placed in a shelter meet the Pinnacle Plan 1.17 commitment. DHS reports that only 30.4 percent (164) of the 540 children ages 13 and older with an overnight shelter stay from January to June 2015 were placed consistent with Pinnacle Plan 1.17. Further compounding the concern raised by this low performance for Pinnacle Plan 1.17 is the fact that the 80 percent performance Target Outcome was intended to be applied to a substantially lower number of children as reflected in the interim target of 13,200 child-nights by June 30, 2015 for children 13 and older.²⁸

²⁷ The final target for this metric (1.17) is 90 percent of children meeting the commitment by June 30, 2016.

²⁸ The interim target of 13,200 child-nights for children 13 and older did not specify a unique number of children. The Co-Neutrals anticipated far fewer child-nights would involve fewer children.

Table 5: Baseline and Performance, Pinnacle Plan 1.17

Performance Categories	Baseline		Current Performance	
	Jan – June 2014		Jan – June 2015	
Children Age 13+, with a shelter stay of at least 1 day	593	100.0%	540	100.0%
Shelter Placements Compliant with Pinnacle Plan 1.17				
Those with 1 stay, less than 31 days	200	33.7%	164	30.4%
Compliant TOTAL	33.7%		30.4%	
Shelter Placements Not Compliant with Pinnacle Plan 1.17				
Those with 1 stay, 31 or more days	136	22.9%	148	27.4%
Those with 2 or more stays, less than 31 days	74	12.5%	45	8.3%
Those with 2 or more stays, 31 or more days	183	30.9%	183	33.9%
Not Compliant TOTAL	66.3%		69.6%	

Table 6 below comparatively shows the progress DHS has made from the starting baseline in reducing shelter nights for children 12 and under compared to children 13 and older.

Table 6: Child-Nights in Shelters by Age, January to June 2015 and Change from Baseline

Child-Nights in Shelters by Age	Baseline (Jan 2012-June 2013)	Performance (Jan 2015-June 2015)	Change (n)	Change (%)
0 to 1	2,923	624	-2,299	-78.7%
2 to 5	8,853	2,275	-6,578	-74.3%
6 to 12	20,147	13,867	-6,280	-31.2%
13 & Older	20,635	24,552	3,917	19.0%
TOTAL	52,558	41,318	-11,240	-21.4%

The Co-Neutrals find that DHS has made good faith efforts to achieve substantial and sustained progress to reduce the number of child-nights in a shelter for the three age groups, under two, two to five and six to 12. This report period is the first in which the Co-Neutrals find good faith efforts to achieve substantial and sustained progress for children ages six to 12. The Co-Neutrals reached this conclusion based on numerous discussions with DHS leadership and staff, as well as external child welfare stakeholders, and a review of data and information which made evident that DHS leadership and staff have undertaken serious and focused efforts to change practice norms regarding the use of shelters for children ages six to 12. Those efforts extended as well to several of DHS' contracted agencies which specifically focused on recruiting new resource families for both young children and older youth under 13. DHS' good faith

efforts during the report period resulted in fewer children and a significant reduction in child-nights in this age group in shelters.

The Co-Neutrals did not observe a similar effort or practice shift by the Department regarding shelter utilization for children 13 and older. After evaluating DHS' efforts as described below, the Co-Neutrals do not reach the same good faith finding for DHS' work to reduce shelter utilization for children ages 13 and older with respect to Target Outcomes.

Closing the State-Operated Shelters and Core Strategies

In February 2015, DHS leadership announced plans to steadily reduce the number of children placed in DHS' two state-operated shelters, Pauline E. Mayer (PEM) and Laura Dester, in order to close the facilities for use as shelters. At the time of this report writing, DHS reported that it discontinued new placements at PEM as of August 1, 2015 and that it is on target to close the Oklahoma City-based PEM shelter by October 1, 2015. DHS also confirmed that its plan with respect to the Laura Dester (LD) shelter is to end new placements by October 1, 2015 and to close this Tulsa-based shelter by December 31, 2015. DHS has also noted that its ability to execute its plan to close the LD shelter is contingent upon its ability to establish the necessary pool of foster and TFC homes, and other appropriate placements along a continuum, as well as change its practices related to disrupted placements.

In addition to its decisions to close the two public shelters, DHS has identified a number of additional core strategies to reduce the number of children entering a shelter and find an appropriate non-shelter placement (with family-like settings as the goal) for children currently living in a shelter. DHS has placed a significant amount of attention on the latter, particularly with respect to finding appropriate placements for children living in the PEM shelter as part of DHS' ongoing effort to close the facility by October 1, 2015.

Specifically, in its Phase I Core Strategies, DHS committed to establishing "a lead shelter position whose sole responsibility is to eliminate shelter usage for children under the age of 12 by SFY16 and to significantly reduce shelter care for children 13 and over by reserving use only for circumstances in which a family-like setting cannot be obtained. This position will coordinate, manage and oversee all shelter reduction efforts both internally and externally."

DHS' designated lead for shelter reduction has worked diligently, along with a team of multidisciplinary specialists from within and outside of DHS, including from foster care, TFC, legal services, and developmental disabilities, among others, to review and develop placement plans for each child in the PEM shelter. The shelter lead has supported the team in exploring all options to secure a family-like or other appropriate placement to meet each child's needs. Most importantly, the shelter lead has worked to explore all possible family or community placements, meeting with the children directly and allowing their considerations to guide the

placement decisions as much as possible. Through this process, DHS has been able to reduce the number of children placed in the PEM shelter from 26 on January 1, 2015 to only five children as of September 10, 2015.

The success of DHS' shelter work at PEM demonstrates what is possible in Oklahoma – approximately one-third of the 30 children whose cases were staffed moved to family-based placements. The placement needs for the other children at PEM provide a window into the types of homes where DHS has the biggest resource gaps: homes for teens and homes for children with special medical, behavioral and/or developmental needs. The shelter case reviews have also made evident how much DHS needs a special strategy for large sibling groups such as, for example, keeping a small pool of homes on retainer to accept large sibling groups when there is a need. These homes might be managed through a special process that reserves these placements for large sibling groups, of which DHS regularly reports they have many.

DHS has decided to focus on one shelter at a time, with the single shelter lead focusing most of their attention first on finding placements for the children at the PEM shelter. As a result, DHS did not realize in this report period similar reductions in the population of children living in the other large state shelter, LD, or the private shelters across the state. Some initial case planning and outreach has started with a handful of cases at other private shelters and the shelter lead began the case review process at LD in late August and has already reported a significant population decline at LD.

DHS' other core strategies in this area include: completing an analysis of various characteristics of children who are placed in shelters to better understand their placement needs and to identify patterns; building the capacity to match children with placements meeting their needs, including traditional foster homes and TFCs; tightening up the placement process to ensure that all placement options other than shelters are explored; and, conducting regular staffing reviews at the state, regional and district level regarding the length of shelter stays for older youth. So far, however, DHS' work has been focused primarily on the case reviews for children placed at the PEM shelter and has appeared isolated from (or, at least not integrated with) these other strategies. Thus, despite the successful efforts of DHS' PEM case reviews, little progress has been observed to date on the other shelter core strategies. Going forward, efforts need to be made to embed, replicate and expand statewide what is being implemented and learned from the PEM case reviews into other components of reform.

From the beginning, there was a clear agreement that striving to achieve zero child-nights in a shelter was an important goal because shelters are not appropriate placements for children, especially young children. DHS should move with an even greater sense of urgency and focus to further reduce shelter placements for all age groups. As such, the Co-Neutrals requested that DHS update its core strategies for shelter usage, which the Co-Neutrals approved and are

reflected in Appendix C. Now that DHS has identified an effective, child-focused review process that has successfully allowed DHS to move children out of a shelter, it would behoove DHS to assess its staff and resources to implement immediately a similar ongoing process for every shelter or region and do it, where possible, simultaneously, not sequentially, and with dispatch.

Use of Private Shelters

As shown in Table 7 and Table 8 below, the majority of children DHS had placed in a shelter during the period of January 1 through June 30, 2015 were placed in one of the 27 private shelters DHS uses and the majority of child-nights occurred in the same 27 private shelters. The Co-Neutrals have visited many of the private shelters run by Youth Services Agencies (YSA). These shelters are much smaller than the two public shelters and their models of care frequently appear more therapeutic (e.g., restraints seem to be used rarely, if ever). That said, these shelters are able to reject children's admissions and may require DHS to retrieve certain children who appear to present behavioral challenges. Private providers have requested these policies in part because they are not resourced properly to manage all children's needs, especially those with more complex behavioral health and developmental needs. Some states and cities have put in place a "no right of refusal" policy, which means private providers cannot refuse admissions or request removal of children from their facilities. In order to ensure that the facilities have the ability to manage the behaviors of children in need of shelter care, the placing agency will provide the additional staffing and support required to implement the no eject, no reject policies. At the time of this writing, DHS and the YSA shelters had not yet developed a strategic plan related to the closure of the public shelters or to the overall reduction in shelter child-nights for children, especially older youth. On the positive side, the YSAs report that they have more communication with DHS than they have had in many years and DHS reports they are eager to partner with the YSAs. The Co-Neutrals are hopeful that progress will be made in this area and that both DHS and the YSAs will consider implementing policies such as no eject, no reject to further the stability of youth placed in the private agency shelters.

DHS' shelter data in Table 7 and Table 8 below is a reminder that much more work lies ahead for DHS to achieve substantial and sustained progress toward its Target Outcomes and reduce the agency's ongoing reliance on shelter placements for children of all age groups.

Table 7: Child-Nights by Shelter, January 1, 2015 to June 30, 2015

Age Group	Total Child-Nights	Shelter			% Other Shelters	% Laura Dester and Pauline E. Mayer Shelters
		Other Shelters	Laura Dester	Pauline E. Mayer		
Age 0-1	624	300	197	127	48%	52%
Age 2-5	2,275	1,226	623	426	54%	46%
Age 6-12	13,867	7,201	4,286	2,380	52%	48%
Age 13+	24,552	17,101	4,707	2,744	70%	30%
Total Child-Nights	41,318	25,828	9,813	5,677	63%	37%

Table 8: Unique Children by Shelter, January 1, 2015 to June 30, 2015²⁹

Age Group	Total Unique Children	Shelter			% Other Shelters	% Laura Dester and Pauline E. Mayer Shelters
		Other Shelters	Laura Dester	Pauline E. Mayer		
Age 0-1	36	15	9	13	42%	61%
Age 2-5	144	75	32	37	52%	48%
Age 6-12	437	261	114	95	60%	48%
Age 13+	540	417	103	79	77%	34%
Total Children	1,157	768	258	224	66%	42%

Shelter Authorizations

In an effort to reduce its use of shelter placements for children, DHS put in place a practice that requires caseworkers to complete a shelter authorization form that identifies efforts made to avoid shelter placement and to hold a telephone conference with their district or regional leader to review these alternate placement efforts prior to a child’s placement into a shelter. The requirement to use the form corresponds with DHS’ phased deadlines around child age and

²⁹ Children who stayed in more than one shelter category were counted for each category. Because of this, not all percentages add up to 100.

shelter usage, with the forms required by January 1, 2013 for children under two; by July 1, 2013 for children ages two to five; by July 1, 2014 for all children under age eight; by October 1, 2014 for children under age 10; and by January 1, 2015 for all children under age 13.³⁰

As part of their verification efforts, the Co-Neutrals reviewed a sample of the shelter authorization forms submitted by caseworkers in connection with shelter placements. During this period, the Co-Neutrals reviewed 105 shelter authorization forms, which included a random selection of forms from January through May 2015, and the complete set of forms submitted for June 2015. This review of the 105 shelter authorization forms revealed that there is still room for substantial improvement around the casework practices associated with shelter placements.

For example, the 54 shelter authorization forms DHS completed in June 2015 showed the following:

- The majority (32 of 54) of shelter authorizations resulted from children's placement disruptions and not children's new placements. While some of the caseworker notes suggest that the worker was surprised by the disruption, most indicate that the worker had notice of a developing problem. Region 4 is putting in place a new protocol to support better placement stability, including the availability of a Mobile Support Team which is targeted for statewide rollout by the end of the year. The lessons learned from this pilot will be critical to disseminate statewide as DHS reduces its reliance on shelter placement.
- Joint response calls with law enforcement continue to lead to shelter placements in lieu of a diligent search for kinship or other family-based placements. However, joint response calls make up a relatively minor number of shelter entries -- only 11 of 54 authorizations in June 2015. Some have raised a concern that the closing of the two public shelters means that law enforcement officers will not have anywhere to bring children if they pick them up as part of an arrest or other police response. In June 2015, only two authorizations in Oklahoma City and five in Tulsa were the result of a joint response removal. While DHS will need to work on finding home-based placements for every child, including those picked up by law enforcement, it appears from this review (and prior reviews done by the Co-Neutrals) that it is a manageable number of children who enter care in this way.
- In at least seven of 22 shelter authorizations involving new placements, the notes indicate that the DHS caseworker worker had previous contact with a child and family

³⁰ DHS requested and the Co-Neutrals approved extensions to the original shelter deadlines for children ages six and older.

but had not developed a placement plan in the event DHS determined the child could not safely remain in their home. CPS and FCS workers will need to plan upfront for the possibility that removal could occur. This does not mean that removal is inevitable but instead that a worker talks with the parent or guardian about the possibility and gathers names of family, close friends, etc., who might be available to help, especially if removal happens in an emergency situation. Many of the shelter authorization forms identify potential family members for kinship placements. In numerous instances, these kin were not immediately reachable and did not become a resource because the placement change was made in an emergency situation rather than a planful context.

- The shelter authorization forms reveal some confusion and/or apparent barriers with respect to the authorization criteria for a TFC placement. According to one worker's notes, one child admitted to the shelter in June 2015 was not approved for a TFC placement because, "he did not meet criteria because he had not disrupted enough placements." The worker was told, according to their notes, that "OHCA is not approving TFC placements without first attempting in home treatment, medication, etc." This noted prerequisite may contribute to the fact that several of the authorization forms showed a child was being discharged from inpatient care to a shelter because no TFC was available. As a side but related note, the Co-Neutrals were informed that a child cannot be placed in a TFC and simultaneously receive developmental disabilities services. This may explain why a shelter authorization form indicated a 7 year-old, non-verbal child with autism admitted to a shelter in January had been turned down for a TFC placement by OHCA. If this is correct, as represented to the Co-Neutrals by several individuals, it would seem that TFC admission policies require re-examination given that five of seven children who remained at the PEM shelter in July 2015 had complex medical, behavioral and development needs.

Finally, with regard to the authorization forms, the quality and extent of information documented varies. Some workers appear to believe that reasonable efforts to find family-based homes are not necessary if a child meets an exception. However, as noted earlier, the exception applies only after reasonable efforts have been made. In other words, the standard (reasonable efforts be made to find a family-based placement) applies to every child in care. Additionally, some forms indicate the caseworker contacted and had a conversation with a supervisor, and some do not. Requiring caseworkers to contact a supervisor or manager provides the opportunity to review placement efforts and, when appropriate, provide the caseworker with guidance and additional support to find a home-based placement. It appears from many of the authorization forms that by the time the call is made, it is inevitable that the child will be placed in a shelter. It is most important that DHS enhance its practices related to placement stability and family-finding before removal occurs (even if removal never happens)

and to accelerate its development of homes for teens and children with special medical and developmental needs (including behavioral health).

Shelter Environment

The Co-Neutrals have previously raised concerns about the environments at the two public shelters based on their review of shelter incident forms and direct observations in the facilities. During this reporting period similar concerns have been raised by the Oklahoma Commission on Children and Youth which has a statutory responsibility to conduct semi-annual, unannounced inspections of state-operated facilities and investigate complaints or inquiries that present concerns with state-run, child and youth serving facilities and systems. While DHS has made a commitment to close its public shelters, children with complex medical, behavioral and developmental needs remain placed in these facilities. The Co-Neutrals remain concerned today about the lack of appropriate services and supports for children who spend time in the public shelters until they are closed. In addition, as YSA shelters are asked by DHS to accept and care for children with more complex needs (as intake at the public shelters winds down), the Co-Neutrals will examine the types of resources and supports that are available to both the children and youth in these settings and the staff that are asked to care for them.

D. Child Maltreatment in Care (MIC)

Section 2.10 of the CSA requires DHS to reduce abuse and neglect of children in its custody, which Oklahoma tracks and reports by the number of children abused or neglected in two distinct categories, based on the type of perpetrator. The first (Metric 1a) consists of alternative caregivers: a foster parent, therapeutic foster parent, kinship parent, or institutional staff person (all referred to as resource caregivers). The second (Metric 1b) involves abuse or neglect by a parent while the child is in DHS' custody.

For most of the period that is the subject of this report, DHS did not have a thoughtful, data-informed plan to reduce child maltreatment in care and, in fact, child maltreatment increased. Separate case record reviews completed by DHS and the Co-Neutrals during the period, and discussed below, highlighted systemic gaps within DHS that historically exposed children to a risk of harm. These gaps pre-date the CSA. At the conclusion of the period, following discussions with the Co-Neutrals, DHS leadership submitted an initial proposal featuring a set of core strategies to focus the agency's efforts to reduce child maltreatment in care and assigned a new member of the management team to oversee the child safety reform work. By August 2015, the plan matured as a result of DHS leadership's ongoing work to analyze its opportunities to strengthen safety practices. The Co-Neutrals approved the plan in August 2015 as part of the Phase II Core Strategies and are encouraged by its scope and detail. The plan,

which DHS also began implementing in August 2015, calls for strengthening DHS' oversight of certain placements and improving its follow-up and coordination after abuse or neglect has been substantiated to prevent future instances of child maltreatment. While there was insufficient evidence of good faith efforts by DHS during the most recent period to make substantial and sustained progress toward the child safety Target Outcomes, the Co-Neutrals' future assessments of DHS' work in this regard will be based on the agency's efforts to implement its new, detailed and thoughtful core strategies plan.

During the most recent period, the Co-Neutrals conducted a record review of all 247 substantiations of abuse and neglect among children in DHS custody reported between October 2013 and September 2014. For substantiations that took place in institutional settings, the Co-Neutrals were particularly interested in understanding DHS' practice of identifying and ensuring the implementation of corrective actions to remove or reduce ongoing threats to children's safety. With respect to substantiations in foster care settings, the Co-Neutrals sought to understand any issues that surfaced as patterns of practice or systemic concerns, which DHS could address to prevent future child maltreatment. The 247 substantiations reviewed were contained in 147 referrals: 104 of these referrals represent maltreatment substantiations of 191 children placed in foster homes and the other 43 referrals involve a total of 56 children who were placed in an institutional setting.

DHS undertook its own case record review, using a stratified random sample of substantiated maltreatment reports collected on children in out-of-home care between October 2013 and September 2014. Reviews were conducted by DHS on 48 substantiated maltreatment reports by out-of-home resource caregivers and 42 substantiated maltreatment reports by parents of children in DHS custody. In general, DHS' findings mirrored those of the Co-Neutrals' larger case record review, and fueled the agency's thinking as it began to develop a plan to reduce child maltreatment in care.

In reviewing the referrals that took place in institutional settings, the Co-Neutrals observed that there were multiple substantiated referrals of child abuse or neglect in some institutions during the reporting period but DHS' system to respond to institutional maltreatment was fragmented, uncoordinated and ineffective. In some cases, institutional staff were poorly trained to de-escalate volatile situations; these staff engaged in a physical intervention with a child or youth, using excessive or inappropriate force such as an incorrectly performed restraint. Second to abuse, a common theme emerged of staff failing to supervise properly children and youth, particularly those at risk for self-harm. Among the institutional settings where children were most frequently abused or neglected was the Laura Dester Emergency Children's Shelter in Tulsa, which DHS leadership is closing as part of its reform work. Several of the core strategies proposed by DHS in its August 2015 plan are designed to reduce maltreatment in institutional

settings, including heightened safety reviews and the ongoing, intensive monitoring of settings where children are most frequently the subject of abuse or neglect referrals, and the victims of substantiated abuse or neglect.

Of the 104 substantiations of child abuse and neglect in foster care, the Co-Neutrals observed numerous instances where children were living in homes that were “overfilled” beyond the authorized capacity of the home, which appeared to strain resources and add stress to the foster home. The Co-Neutrals observed instances where children with high needs were placed in homes that did not appear to have the supports or skills to properly care for them. The review revealed homes with multiple children with challenging behaviors (such as, sexually acting out, aggressive behavior, tantrums, and severe depression) placed together. The review identified numerous concerns with the screening, approval and ongoing oversight and support of certain foster homes. Several of the core strategies proposed by DHS in its August 2015 plan are designed to reduce maltreatment in care by a parent, including enhanced safety reviews on monthly visits and closer reviews of prior referrals.

The Co-Neutrals will conduct a comprehensive, follow-up case record review in 2016 to assess further DHS’ efforts to implement its core strategies to achieve substantial and sustained progress to reduce child maltreatment in care.

Child Safety: Abuse and Neglect by Resource Caregivers While Child is in the Legal Custody of DHS, Metric 1a

With regard to the first measure, DHS and the Co-Neutrals agreed DHS would improve safety for children in care using two indicators. First, DHS tracks and reports publicly the number of children abused or neglected by a resource caregiver on a monthly basis. Second, DHS and the Co-Neutrals adopted the widely used federal metric, “Absence of Child Abuse and/or Neglect in Foster Care,” which represents the percent of all children in foster care during a 12-month period who were not victims of substantiated maltreatment by a foster parent or facility staff.³¹

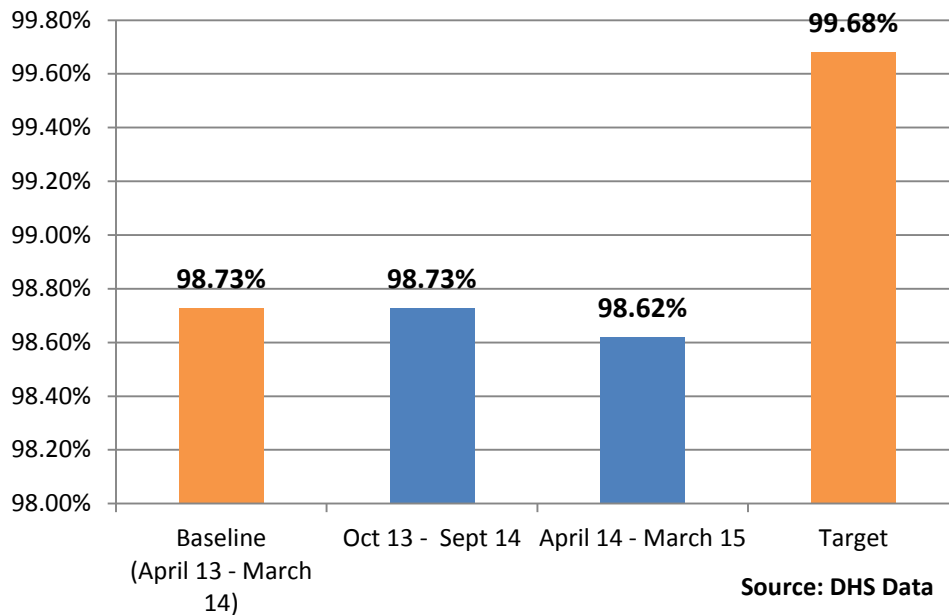
For this metric’s report period, which covers the 12 months of April 2014 through March 2015, DHS reported that 230 children out of 16,640 in DHS custody were victims of child maltreatment. This represents a rate of 98.62 percent of children in DHS custody during the period who were not victims of child maltreatment. For DHS to have met the Target Outcome of 99.68 percent children in custody absent of child maltreatment, DHS would have had to keep

³¹ In October 2014, the federal Children’s Bureau changed the metric it uses to assess state child welfare efforts to reduce maltreatment in care. The new federal metric combines maltreatment in care by resource caregivers and by parents, with some additional adjustments to the methodology. For consistency and comparability, the Co-Neutrals will continue to use the two metrics listed here in their reporting.

an additional 177 children safe from abuse and neglect by a resource caregiver.

During the baseline period, April 2013 to March 2014, DHS reported 98.73 percent of children in DHS custody were not victims of child maltreatment and reported the same outcome of 98.73 percent during the last report period of October 2013 to September 2014. As such, DHS' performance in keeping children in DHS custody safe from maltreatment by a resource caregiver declined during this reporting period from 98.73 to 98.62.

Figure 16: Metric 1a – Absence of Maltreatment in Care by Resource Caregivers



In addition to publicly reporting performance on this metric semi-annually, DHS publicly reports substantiations of child maltreatment in their monthly data. Over the same 12-month period, April 1, 2014 to March 1, 2015, DHS reported 279 substantiations of child abuse and neglect by a resource caregiver. Of these, 48 substantiations are not included in the federal metric adopted by the Co-Neutrals as Measure 1a for two reasons: (1) 40 cases of child abuse or neglect were excluded because, according to the federal methodology in place at the time the Metrics Plan was finalized, both the referral date (date when an allegation is made to DHS) and findings date (date when the case is substantiated by DHS) must exist in the same 12 month reporting period; and (2) eight cases were not counted in the metric because they represent multiple substantiations for the same child.³²

³² One substantiation was included in the monthly data but excluded in DHS' federal reporting as the child was not in custody at the time of the incident.

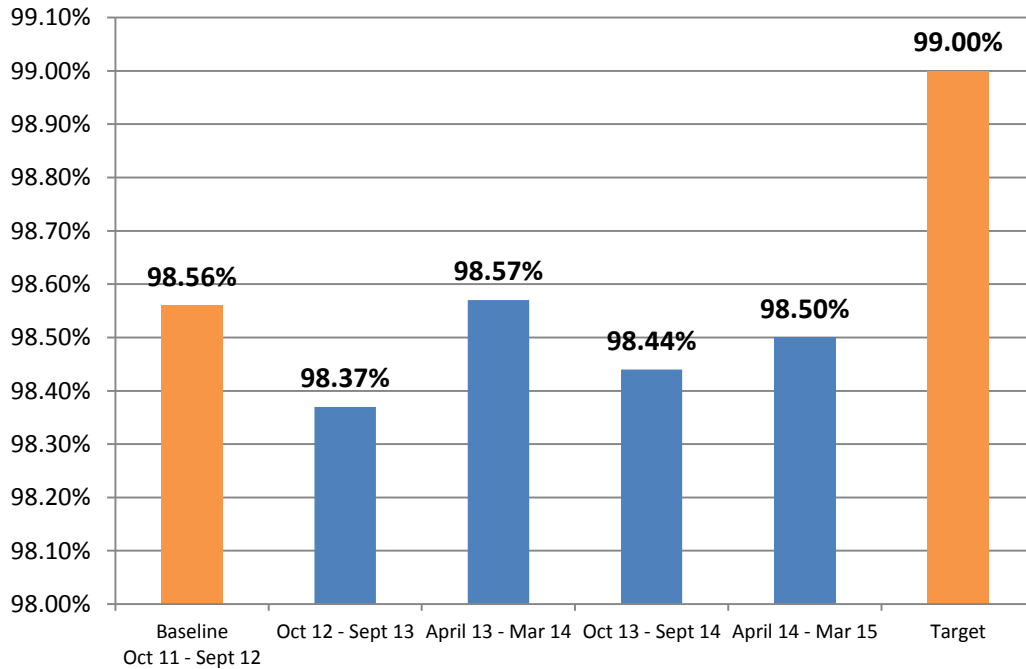
Child Safety: Abuse and Neglect by Parents While Child is in the Legal Custody of DHS, Metric 1b

The Co-Neutrals adapted the methodology utilized in the preceding section, Abuse and Neglect by Resource Caregivers, to measure abuse and neglect by parents while a child is in the legal custody of DHS. This includes the significant population of children who remain the legal responsibility of DHS but who reside in, or have been placed back in, their homes of origin for trial home visits. In Oklahoma, children can experience trial home visits for months, and DHS recognizes the importance of closely monitoring their safety.

This metric for “Abuse and Neglect by Parents While Child is in the Legal Custody of DHS,” measures performance this way: Of all children in the legal custody of DHS during the reporting period, the number and percent of children who were not victims of substantiated or indicated maltreatment by a parent and the number of children who were victims over the 12-month period.

For this report period, April 2014 through March 2015, DHS served 16,640 children in custody, 250 of whom had parents who abused or neglected them while the children were in DHS custody, yielding a performance rate of 98.50 percent against a target of 99 percent. For DHS to have reached the target during this period, the agency would have had to prevent maltreatment for an additional 84 children. For the previous 12-month report period, October 2013 through September 2014, DHS reported that out of 16,272 children in DHS custody, 254 children were maltreated by their parents while in DHS custody. This represents a performance rate of 98.44 percent.

Figure 17: Metric 1b – Absence of Maltreatment in Care by Parents



Source: DHS Data

In DHS' monthly-reported data for this 12-month period, DHS shows an additional 75 substantiations of maltreatment of children by their parents while in DHS custody. These 75 substantiations are not included among the 250 children reported in the measure because of the same federal exceptions applicable in Metric 1a: 52 are excluded because the referral date (date when an allegation is made to DHS) and findings date (date when the case is substantiated) do not exist in the same 12-month reporting period; and, eight are excluded because they represent multiple substantiations for the same child.³³

E. Caseworker Visitation

DHS understands that regular visits by the same caseworker to the same child are associated with faster permanency, building relationships between caseworkers, children and caregivers, and providing benchmarks to assess children's safety and well-being from visit to visit. The CSA includes two performance areas related to caseworker visits (CSA Section 2.10): the frequency of caseworker visits, which is defined as the number of required monthly visits completed with

³³ Fifteen substantiations of MIC by a parent while in DHS custody were included in the monthly data but excluded from the federal reporting due to additional federal exclusionary rules, data entry errors or lags and other data system related discrepancies.

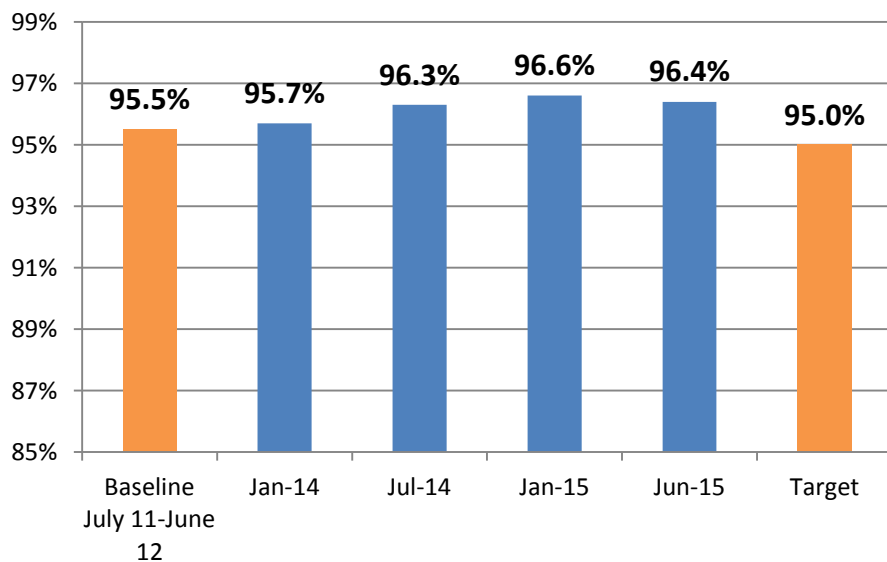
children in care; and, continuity of visits by the same caseworker. For frequency of visits, the Metrics Plan establishes that DHS will report the following:

3.1: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between caseworkers and children in foster care for at least one calendar month during the reporting period.

3.2: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between primary caseworkers and children in foster care for at least one calendar month during the reporting period.

Regarding Metric 3.1, DHS reported that caseworkers made 123,596 (96.4 percent) out of 128,173 required visits with children during the reporting period of July 1, 2014 to June 30, 2015. The baseline for DHS' performance was an already strong 95.5 percent of all required visits made. DHS has consistently shown in every report period to date performance that exceeds the Target Outcome of 95 percent for this metric. In the current report period, DHS' performance was 96.4 percent, again above the Target Outcome set at 95 percent.

Figure 18: Metric 3.1 – Frequency of Visits by All Workers



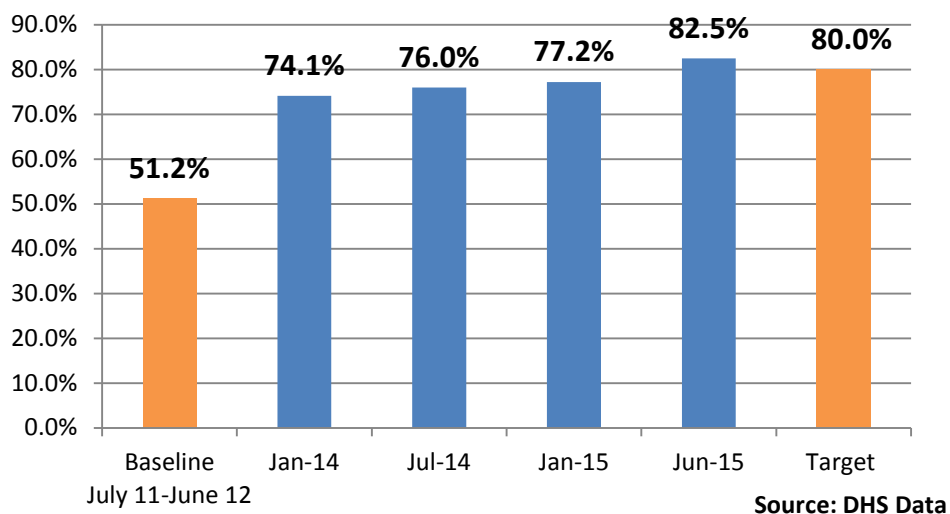
Source: DHS Data

Visits with children are a priority within the Oklahoma child welfare system and workers feel strongly that they must see the children on their caseload at least once per month. This

continues to be a strength of the system with DHS meeting the target for five consecutive reporting periods and the Co-Neutrals conclude that DHS has made good faith efforts to achieve substantial and sustained progress with the Target Outcome for Metric 3.1.

The second indicator, Metric 3.2, includes only visits made by primary caseworkers. DHS decided in its Pinnacle Plan to end the use of secondary workers across the state by January 2014; the Co-Neutrals approved DHS' request to stagger implementation of this commitment until January 1, 2015. DHS reported that primary workers made 105,749 visits with children out of 128,173 required monthly visits, which represents 82.5 percent of all required visits during the reporting period of July 1, 2014 to June 30, 2015. For monthly visits conducted by primary workers only, the baseline for DHS' performance was 51.2 percent and the interim target due for FFY2015 was 80 percent, which DHS exceeded.

Figure 19: Metric 3.2 – Frequency of Primary Worker Visits



DHS has continued to trend positively in this performance area, which reflects DHS' successful implementation of its commitment to end the use of secondary workers. The Co-Neutrals conclude that DHS has made good faith efforts to achieve substantial and sustained progress with the Target Outcome for Metric 3.2.

Performance Metrics for Continuity of Visits, Metrics 3.3a and 3.3b

The measure the Co-Neutrals use to assess Oklahoma's progress on continuity of children's visits with the same caseworker was staged in two phases. First, DHS reported on the

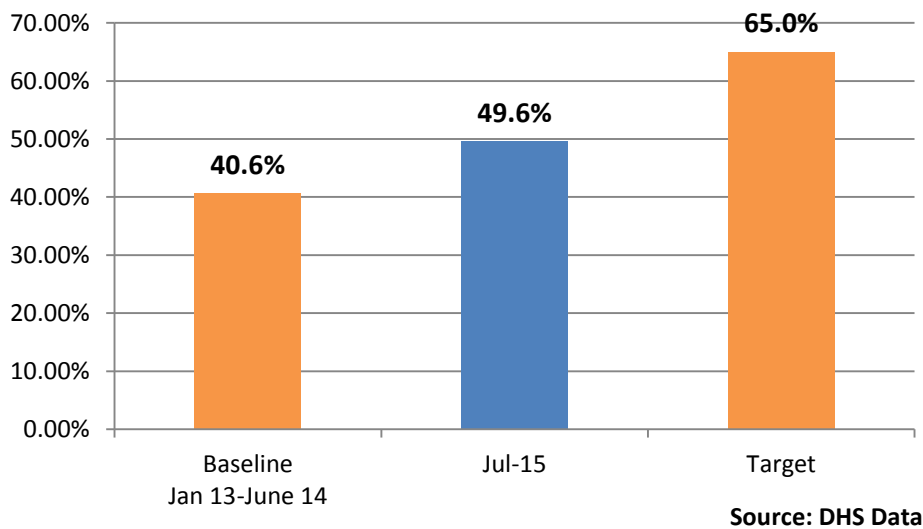
continuity of visits over three months (Metric 3.3a).³⁴ DHS is now in the second phase, and has for the first time reported performance data on continuity of visits over six months (Metric 3.3b), which is a more stringent measure than 3.3a. Metric 3.3b measures the following:

The percentage of children in care for at least six consecutive months during the reporting period who were visited by the same primary caseworker in each of the most recent six months, or for those children discharged from DHS legal custody during the reporting period, the six months prior to discharge.

During the prior performance period, DHS and the Co-Neutrals established the baseline and target for the six-month continuity of visits metric. For the period of July 1, 2013 to June 30, 2014, DHS reported a baseline of 40.6 percent and the Co-Neutrals approved a final target of 65 percent.

DHS reported that between July 1, 2014 and June 30 2015, there were 10,349 children in DHS custody who required at least six consecutive visits. Of these 10,349 children, 5,135 (49.60 percent) were visited by the same primary caseworker in their most recent six months in care. In this first reporting period for this metric, DHS' performance has improved by nine percent from the baseline starting point of 40.6 percent.

Figure 20: Metric 3.3b – Continuity of Primary Worker Visits Over Six Months



³⁴ DHS is no longer required to report on Metric 3.3a, which measured three month continuity of visits with the same primary caseworker.

Here too, DHS' good faith efforts to eliminate secondary casework assignments have contributed to DHS' ability to show improved performance in the continuity of visits with the same primary caseworker. As caseloads continue to improve and DHS' workforce further stabilizes with lower turnover, DHS should be able to report even greater gains toward the Target Outcome for this performance area. The Co-Neutrals find that DHS has made good faith efforts to achieve substantial and sustained progress toward the Target Outcome for continuity of visits over a six-month period.

Through various case record reviews, the Co-Neutrals have found that the contact notes completed by DHS staff for monthly visits are frequently not extensive which raised some questions with respect to the quality and thoroughness of the monthly visits. This is the case even in the areas of well-being which caseworkers are guided to assess and document. To better understand the quality of DHS' caseworker visits and to continue to verify that the visits occurred as reported by DHS, the Co-Neutrals conducted a phone survey of foster parents who had a child placed in their home for the six-month period of January 2015 through June 2015. The Co-Neutrals used a random stratified sample of foster homes to draw a proportionately representative pool of homes that reflected differences in region size and caseload compliance across the state and the different types of resource homes (traditional, supported, TFC, kinship relative and kinship non-relative) in each district. The Co-Neutrals' team called a total of 321 foster homes and completed a total of 193 surveys. To maintain the stratified sample criteria, 150 completed surveys are calculated in the survey findings.³⁵

The Co-Neutrals developed a survey instrument focused in part on the frequency with which caseworkers discussed with foster parents the supports and services they may need for themselves and their foster children. The tool aimed to understand foster parents' perspectives on monthly contacts and if they are used to advance foster children's well-being and foster parents' capacity to care for the children placed with them. The survey questions also asked foster parents if monthly visits are used to advance a child's permanency plan, the length of monthly visits, and foster parents' overall level of satisfaction with their monthly contacts.

Overall, the findings of the survey showed that the majority of foster parents reported they perceive the quality of their monthly visits with their foster child's caseworker as positive.³⁶ For

³⁵ The 43 completed surveys not calculated in the survey findings were identified through a random stratified selection.

³⁶ See Appendix E for a detailed description of the findings of the foster parent survey, including how the categories of satisfied (positive) and dissatisfied (negative) are defined.

example, 75 percent of foster parents responded that they are satisfied with the overall quality of monthly visits compared to just 12 percent who reported being dissatisfied.

The survey findings also revealed, as expected, that caseload compliance levels correlate with foster parents' reported level of satisfaction with monthly visits. Foster parents served by permanency caseworkers from districts with medium size caseloads report the highest level of satisfaction. Sixty-six percent of foster parents from medium size caseload districts responded that they are always satisfied with the quality of their monthly visits, compared with 48 percent of foster parents from districts with high caseloads who said they were always satisfied with their monthly visits.

The survey results also showed that, according to foster parents, 87 percent of visits are 30 minutes or longer and, of these, the most common length of a monthly visit is one hour (32 percent). The length of the monthly visits also shows some linear correlation to caseload levels, with foster parents served in low caseload districts reporting the longest monthly contacts. Ninety-two percent of foster parents in low caseload districts reported contacts lasting 30 minutes or more, compared to 88 percent in medium size caseload districts and 82 percent in high caseload districts.

The survey found some variation between foster parents of different resource types in their reported level of satisfaction with caseworkers' monthly contacts. Overall, kinship non-relative homes reported the highest level of satisfaction (68 percent), while traditional homes reported the lowest level of satisfaction (42 percent).

More detailed information on the responses to the individual survey questions and a full summary of the survey findings are included in Appendix E. The survey provides evidence that visits occur as frequently as reported by DHS. While case record notes from monthly visits may not comprehensively document the full content of visits, the foster parents who agreed to participate in this survey indicated they are often satisfied with how caseworkers engage with them each month to discuss what their foster children need to achieve well-being, stability and permanency.

F. Placement Stability

The CSA requires that DHS establish performance targets to provide stability of placements for children in DHS custody (CSA Section 2.10) and reduce the number of times a child moves to a new placement while in DHS custody. It is widely understood and reported that placement instability causes trauma for children and is associated with increased behavioral challenges and poor educational and health outcomes, and longer waits to permanency.

Performance Standards

The Co-Neutrals and DHS agreed to use the federal Adoption and Foster Care Reporting System (AFCARS) files and definitions for placement moves to measure children’s placement stability. This report reviews performance data for the period April 1, 2014 to March 31, 2015 for Metrics 4.1 (a through c) and 4.2 as well as efforts underway by DHS through June 30, 2015.

Performance Outcomes

DHS understands the importance of a child’s first placement being the best placement to support placement stability and that this approach requires DHS to establish and maintain a robust continuum of care (foster homes, TFCs and higher levels of care such as group homes) to meet the diverse needs of children in DHS’ custody. Achieving stable placements also requires caseworkers to have manageable caseloads, so they have the time needed to focus on the children and foster families who depend on their support.

For this reporting period, DHS continued to show minor yet steady improvements for Metrics 4.1 a, b and c as detailed in Table 9 below. These metrics report on the number of children who experience two or fewer placements at different lengths of time in DHS custody (e.g., 12, 24 or 36 months). For Metric 4.2, which reports on the number of children who experience two or fewer placements after their first 12 months in care, DHS also made some minor improvement from the last report period (from 77.7 to 78.5 percent) and remains above the baseline set at 74 percent.

Table 9: Placement Stability Baselines, Targets, and Current Performance

Metric	Baseline Oct 2011 - Sept 2012	Target June 30, 2016	Performance Oct 2012 – Sept 2013	Performance April 2013 – March 2014	Performance Oct 2013 – Sept 2014	Performance April 2014- March 2015
4.1(a): percent of children in custody with 2 or fewer placements who are in care less than 12 months	70.0%	88.0%	72.9%	74.4%	76.1%	77.2%
4.1(b): percent of children in custody with 2 or fewer placements who are in care more than 12 months but less than 24 months	50.0%	68.0%	50.8%	52.3%	54.0%	55.9%
4.1(c): percent of children in custody with 2 or fewer placements who are in care at least 24 months	23.0%	42.0%	24.8%	26.0%	27.5%	30.0%
4.2: percent of children in care more than 12 months, with 2 or fewer placements after their 12 months in care	74.0% (Apr. '12– Mar. '13)	88.0%	76.5%	78.0%	77.7%	78.5%

While DHS is continuing with some upward, positive movement in these placement stability metrics, the current pace of progress is not sufficient to allow DHS to meet the Target

Outcomes should this pace remain the same over the next two reporting periods. The Co-Neutrals have urged DHS to move with a sense of urgency and bring additional, focused effort to achieve more substantial progress in this area so that children in DHS custody can experience more stable placements.

Core Strategies

After the end of this period, DHS submitted and the Co-Neutrals approved a set of core strategies focused on increasing placement stability for children in out-of-home care. (See Appendix C for the full list of Placement Stability core strategies.) These strategies include a close review of placement disruption data to determine the resources and supports most needed to increase placement stability. Core strategy commitments for foster homes, TFCs and caseloads are also designed to have a positive impact on placement stability.

One of DHS' core strategies aims to reduce placement disruptions by enhancing specialized behavioral health supports and services available - both timely and comprehensively - to foster parents who may be experiencing a behavioral health crisis or some rising instability with their foster children. As referenced earlier, in Region 4, DHS has already begun to use Mobile Stabilization Teams (MST) of behavioral health specialists who can respond immediately (20 minutes by phone or two hours in person) to foster parents or foster children contemplating an imminent disruption. DHS has also been working with the Oklahoma Department of Mental Health and Substance Abuse (ODMHSA) to embed within Region 4 district offices 15 System of Care coordinators who represent four behavioral health provider agencies serving Region 4. These 15 representatives provide on-site assistance to DHS caseworkers, helping them to coordinate behavioral health services and supports for foster children and families. In the late spring, the Co-Neutrals met with some of these MST caseworkers and ODMHSA System of Care coordinators in Region 4 as they were starting their work. Their efforts to support DHS case managers were evident, and care coordinators reported that their support was well-received by case managers.

In its core strategies, DHS has committed to maximize available resources to expand the MST teams and System of Care Coordination statewide by January 2016. In moving from a pilot phase in Region 4 to a statewide program, DHS has committed to train district directors, supervisors, and CW specialists on a mandatory displacement protocol to ensure system of care and mobile supports are utilized when appropriate and by the clients who are most in need of these resources. As DHS implements its placement stability core strategies and moves towards statewide implementation, DHS needs to track closely the effectiveness of its strategies, particularly from its pilot program in Region 4, and timely adjust strategies should the intended results not be achieved. At the end of this reporting period, DHS was in the midst of launching

its Region 4 pilot so its efforts were not yet focused on statewide roll out which the Co-Neutrals will discuss in the next report.

Using Caseworker Visits to Promote Stability

To support placement stability, DHS policy requires caseworkers to increase visits with the foster child and foster parent assigned to them in times of change and stress. In their foster parent phone survey, described earlier, the Co-Neutrals asked foster parents how often their child's caseworker increased visits in times of change or stress in order to support their continuing to care for the child in their home. The survey found that 44 percent of foster parents interviewed responded that their caseworker "Always" increased contacts in times of change and stress compared to 14 percent who responded their caseworkers "Never" increased visits during these times. Seven percent of foster parents responded that they have never experienced change or stress in their homes, and as a result, increased visits by the caseworker have not been necessary.

The Co-Neutrals find that DHS has made good faith efforts to achieve sustained progress toward the placement stability Target Outcomes and, in their next report, will review DHS' efforts to implement its core strategy commitments to support more stable placements for children and even more substantial progress in this performance area.

G. Permanency

The Co-Neutrals discussed in the last commentary report that, at this point in the reform effort, DHS should be intensely focused on achieving permanency for children and youth. During the first three years of the reform effort, it was hoped that DHS would have made substantial progress toward the Target Outcomes in the caseload and foster care performance areas, two advancements that can significantly bolster permanency outcomes. However, when the Co-Neutrals issued the last commentary, DHS had not yet realized substantial or sustained progress and was trending negatively against the starting baselines for most of the permanency measures. As a result, the Co-Neutrals urged DHS to evaluate the many Pinnacle Plan permanency commitments and to develop core strategies that DHS believes, if successfully implemented, will enable staff to focus, prioritize and sequence efforts to improve timely permanency outcomes for children in the state's custody.

DHS leadership agreed it was necessary to focus its efforts in order to make substantial progress and in August 2015, after the conclusion of this report period, DHS finalized and began to implement a permanency core strategy plan. A few of the strategies articulated in the plan had been implemented earlier in the report period but the majority of the core strategies were implemented after its conclusion. Consequently, the Co-Neutrals are able to evaluate some but

not all of DHS' efforts to implement the full set of permanency core strategies in this report period but will do so in the next report period.

DHS' core strategy plan focuses attention on three groups of children: those who are legally free living in an identified adoption placement who have not yet achieved permanency; children who are legally free for adoption without an identified adoption placement and children who have a case plan goal of reunification.

DHS leadership reported that it assigned dedicated staff to conduct case reviews for a cohort of 795 legally free children living with an identified family but for whom permanency was delayed. DHS reported that as a result of focused case reviews, barriers to permanency were identified and addressed. DHS tracked case progress to ensure that permanency was achieved and reported that 574 children and youth, 72 percent of the cohort, had achieved permanency by the end of this report period.³⁷ Based on lessons learned during the cohort case reviews, DHS formalized a case review model, Adoption Timeliness Accountability Teams (ATAT), for all legally free children living with identified families. DHS reported that it plans to pilot ATAT in Region 1 during September 2015 followed by statewide implementation by December 31, 2015. DHS has made significant progress through implementation of this core strategy and the Co-Neutrals commend agency leadership for its focused efforts to move these legally free children and youth to permanency.

DHS' second core permanency strategy focuses on all legally free children with the goal of adoption but who are not living in an identified adoption placement. DHS' goal is to reduce the length of time these children wait to be placed with permanent families. DHS committed to implement a targeted family finding effort designed to locate a placement for these legally free children, and to expedite the process to adoption finalization once a family is located.

DHS' third core strategy is to implement safety focused permanency case reviews for children with a goal of family reunification. The case reviews are designed to confirm that reunification remains a safe and viable option. DHS reports that when staff determines that a child can be safely reunified, they will be required to implement and closely track activities to support and prepare the family and child to achieve reunification. DHS committed to roll out the reunification case reviews in two districts by August 2015 with statewide implementation scheduled by December 2015.

Because DHS will implement the second and third core strategies after the end of this report period, the most recent performance data discussed below does not yet reflect the core

³⁷ The Co-Neutrals do not yet have data for the period discussed above and will verify DHS' performance in the next commentary report.

strategies' potential impact on permanency outcomes. The Co-Neutrals will evaluate DHS' implementation efforts in the next report period and are hopeful that the next period's performance data will reflect progress toward the permanency Target Outcomes.

Permanency Performance

For this report period, which covers permanency outcomes reported from April 2014 through March 2015, DHS' data continued to show permanency outcomes below the starting baselines for six out of ten permanency metrics.³⁸

Legally Free Children without an Adoptive Family on January 10, 2014, Metric 6.1

DHS, under Metric 6.1, is responsible to move an identified cohort of legally free³⁹ children and youth without an identified family to permanency. DHS and the Co-Neutrals established the point-in-time cohort of 292 children who were legally free for adoption as of January 10, 2014, and who did not have an identified adoptive placement. On June 10, 2014, the Co-Neutrals established permanency targets for these children and youth as follows:

- By June 30, 2016, 90 percent of the 207 children who were ages 12 and under on January 10, 2014 will achieve permanency.
- By June 30, 2016, 80 percent of the 85 children who were ages 13 and over on January 10, 2014 will achieve permanency.

DHS' strategy to achieve permanency for the cohort is to convene permanency case reviews led by adoption staff. During the case reviews, the child's worker and adoption staff review barriers to permanency and create action plans to resolve the barriers. DHS reported that it continued to utilize this targeted, child specific strategy throughout the reporting period and will continue to do so as it seeks to achieve permanency for many more children and youth in the cohort.

DHS reported that 78 (37.7 percent) of the 207 children in the younger segment of the cohort (ages 12 and under) achieved permanency as of June 30, 2015. This is an increase of 31 children since January 1, 2015 when DHS last reported to the Co-Neutrals that 47 children had achieved permanency. For this younger segment of the cohort, the Co-Neutrals find that DHS has made good faith efforts to achieve sustained positive trending toward the Target Outcome.

For the 85 children in the older group (ages 13 and older), DHS reported that a total of 17 children (20 percent) achieved permanency as of June 30, 2015, an increase of nine children

³⁸ For one of the ten permanency measures, Metric 6.1, the Co-Neutrals are evaluating performance using the Target Outcomes set for two separate age groups established for the identified point-in-time legally free cohort.

³⁹ These are children and youth whose parents' rights have been legally terminated by the Court.

since January 1, 2015. DHS also reported that as of June 30, 2015, 12 children (14.1 percent) in the older cohort have aged out of custody without achieving permanency, an increase of six children since December 31, 2014 – the end of the last period for this measure.

The Co-Neutrals reviewed information in the KIDS system including monthly contacts dating back to 2013 as well as permanency related documents in the KIDS file cabinet for the 12 youth who did not achieve permanency. The Co-Neutrals found that, in most cases, youth participated in independent living courses, and it appears that in five cases youth voluntarily chose to remain in foster care until age 21. It should be noted that the average number of placements experienced was 14, with most youth (10 of the 12) experiencing at least 10 placements while in foster care.

In six of the 12 cases, youth were living with a family prior to foster care exit and the plan was for them to remain in the home after turning 18. In some of these cases, it was apparent that the family and youth were bonded to one another, and the child did well in the home. Guardianship was discussed in two of these cases and in two other cases, the families and the youth signed “Permanency Pacts,” which are agreements between the family and youth.

In the remaining six cases, outcomes seemed much less secure. In two cases, it was unclear what actions DHS took to prepare the youth for foster care exit after their case plan goal was changed from adoption to Planned Alternative Placement. In two other cases, youth were placed in group homes prior to turning 18, and the plan was to transition the youth to a different group home that would accept them upon turning 18. In the remaining two cases, one young woman was moved to a bridge placement from a shelter the day before she turned 18, and the sixth youth after turning 18 years old moved into an apartment with her baby with assistance provided by her previous foster mother.

In summary, the Co-Neutrals found that some youth were living in stable placements with committed adults at the time of exit. There are other cases however, in which youth did not have stability or connections to a committed adult. DHS has resolved permanency for only 20 percent of the older youth cohort and 14 percent have aged out of care without a permanent family. DHS must significantly enhance its efforts to achieve permanency for these vulnerable youth in the upcoming period in order to demonstrate good faith efforts to achieve the Target Outcome.

For this report period, DHS has shown progress, although not substantial, to achieve permanency for this older segment of the legally free cohort. However, based on the Co-Neutral’s review of data and information including the records of these older youth, the Co-

Neutrals have determined that DHS has not yet made good faith efforts to achieve substantial and sustained progress toward the Target Outcome.

Table 10: Permanency Performance for Metric 6.1

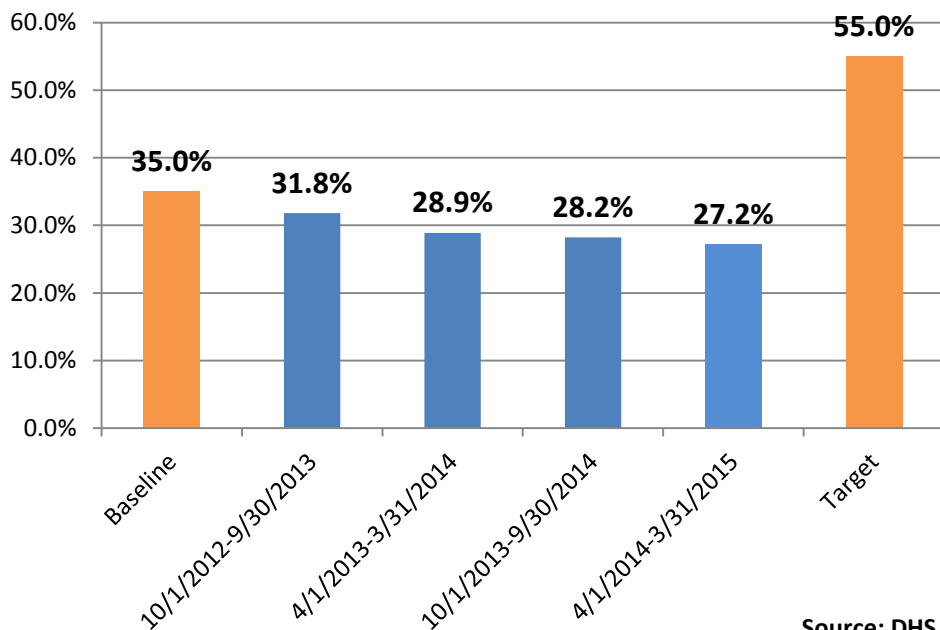
Permanency Metric	Baseline	Permanency Target by June 30, 2016	Permanency Achieved as of August 15, 2014	Permanency Achieved as of January 1, 2015	Permanency Achieved as of June 30, 2015
6.1: Of all legally free children not in an adoptive placement on 1/10/14, the number who have achieved permanency.	207 children- Age 12 and under	90%	17 children (8.2%) achieved permanency	47 children (22.7%) achieved permanency	78 children (37.7%) achieved permanency
	85 children- Age 13 and older	80%	2 children (2.4%) achieved permanency	8 children (9.4%) achieved permanency	17 children (20.0%) achieved permanency

Timeliness of Children’s Permanency, Metrics 6.2 (a-d)

Metrics 6.2 (a-d) measure DHS’ progress in achieving timely permanency for children who entered foster care at a designated time and who achieved permanency in 12, 24, 36 or 48 months from the child’s removal from their family. In three (6.2 b, c and d) of the four 6.2 metrics, DHS is showing some recent, although mostly slight improvements. Performance for the fourth metric (6.2a) has declined slightly. In all four metrics (6.2 a, b, c and d), DHS’ performance outcomes remain below the starting baseline. DHS would have had to achieve more significant improvements for each of the metrics both to exceed the starting baseline and achieve substantial progress for this period. The following summaries and Tables detail the baselines, performance to date and targets for the 6.2 metrics.

Metric 6.2a, Permanency within 12 months of removal: DHS reported that of the 2,749 children who entered foster care between October 1, 2013 and March 31, 2014, 748 children achieved permanency within 12 months of their removal date. This represents a permanency achievement rate of 27.2 percent for Metric 6.2a – the Target Outcome is 55 percent. With the baseline set at 35 percent, DHS’ performance has trended negatively and below the baseline for four consecutive reporting periods. While positive outcomes are important to realize in every 6.2 metric, high performance for the target for 6.2a means children experience the least amount of time in DHS custody before achieving permanency.

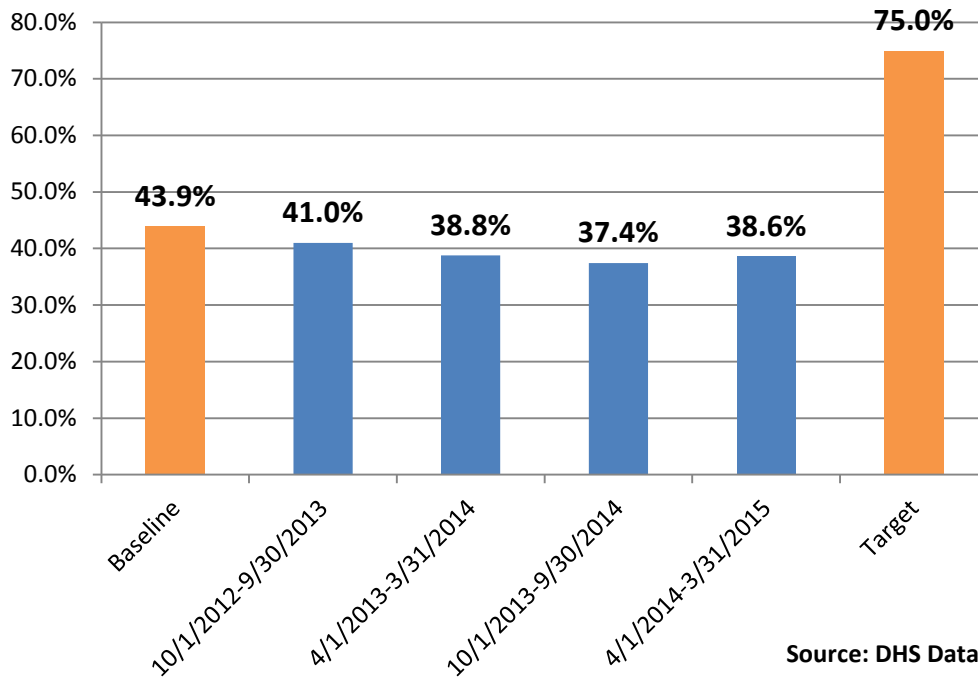
Figure 21: Metric 6.2a – Permanency within 12 Months of Removal



Source: DHS Data

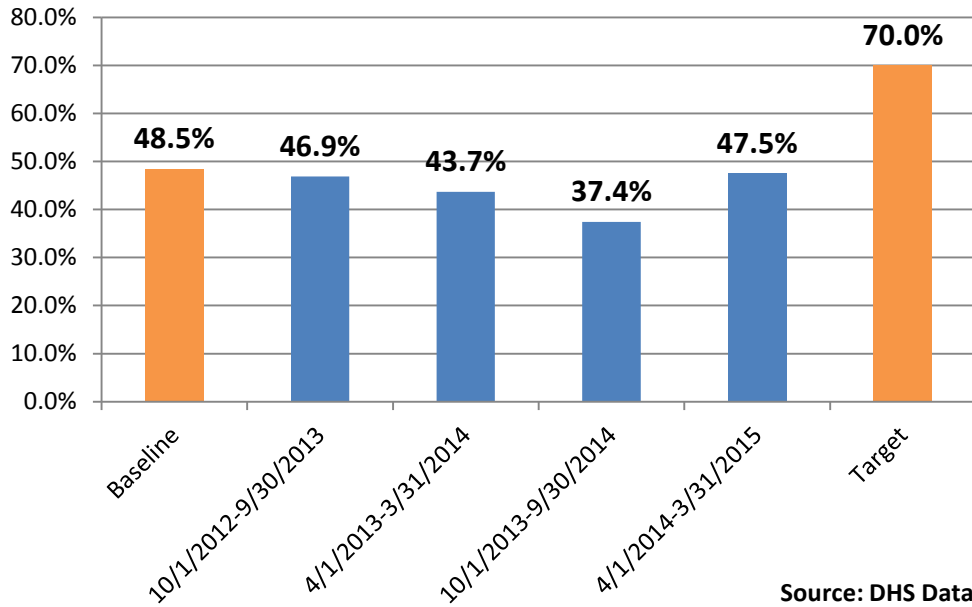
Metric 6.2b, Permanency within two years of removal: DHS reported that of the 1,846 children who entered foster care between October 1, 2012 and March 31, 2013 and stayed in foster care for at least 12 months, 713 children achieved permanency within two years of their removal date. This represents a permanency achievement rate of 38.6 percent for Metric 6.2b – the Target Outcome is 75 percent. While performance has improved slightly from the last reporting period, DHS has continued to report outcomes below the baseline in every report period.

Figure 22: Metric 6.2b – Permanency within 2 years of Removal



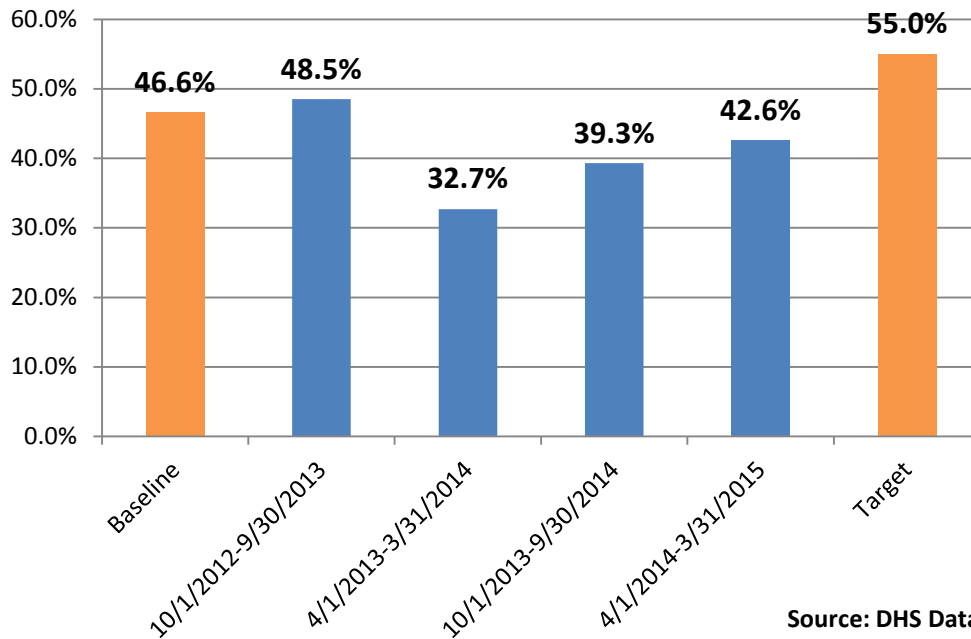
Metric 6.2c, Permanency within three years of removal: DHS reported that of the 872 children who entered foster care between October 1, 2011 and March 31, 2012 and stayed in foster care for at least 24 months, 414 children achieved permanency within three years of their removal date. This represents a permanency achievement rate of 47.5 percent for Metric 6.2c – the Target Outcome is 70 percent. Despite, performance remaining below the baseline (48.5 percent) for the fourth consecutive reporting period, DHS’ performance this period has improved by almost ten percent, a trend that, if sustained, will allow DHS to exceed its baseline and come substantially closer to the Target Outcome for this metric.

Figure 23: Metric 6.2c – Permanency within 3 years of Removal



Metric 6.2d, Permanency within four years of removal: DHS reported that of the 343 children who entered foster care between October 1, 2010 and March 31, 2011 and stayed in foster care for at least 36 months, 146 children achieved permanency within four years of their removal date. This represents a permanency achievement rate of 42.6 percent for Metric 6.2d – the Target Outcome is 55 percent. As shown in Figure 24 below, performance for this measure has improved slightly; yet, here too, DHS’ performance remained below the baseline and for the third consecutive report period.

Figure 24: Metric 6.2d – Permanency within 4 years of Removal



The Co-Neutrals set reasonable targets for each of the 6.2 metrics, allowing DHS an opportunity to show substantial progress toward the ultimate Target Outcomes. During the period, DHS began to implement some core strategies designed in part to achieve timely permanency. However, the agency’s approach was insufficiently focused for most of the period and performance continued to lag below each 6.2 baseline measure. The Co-Neutrals find that DHS has not yet made good faith efforts to achieve substantial and sustained progress for Metrics 6.2 (a-d) but the Co-Neutrals are hopeful that the agency’s adoption, management and implementation of its new permanency core strategies will spur progress for children.

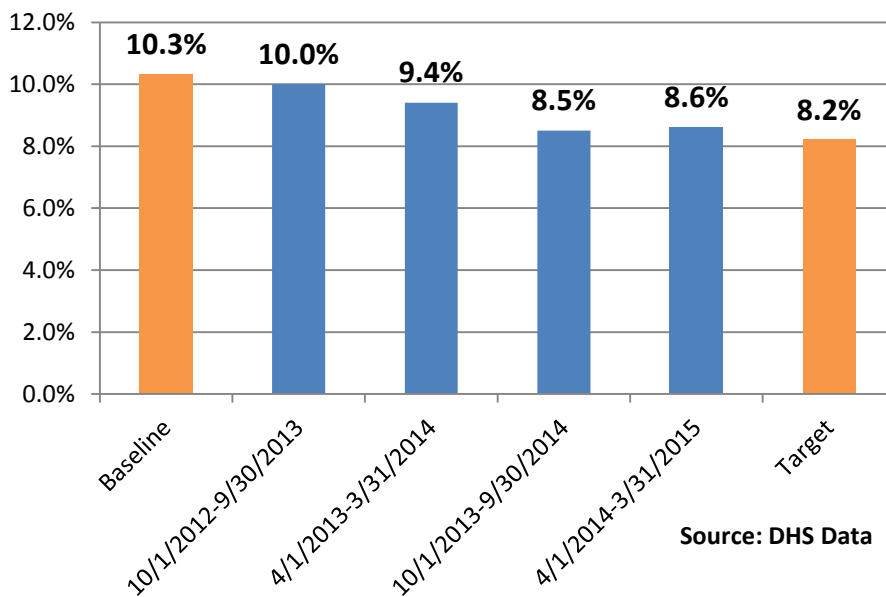
Children’s re-entry to foster care within 12 months of exit, Metric 6.3

Metric 6.3 measures how well DHS ensures that children who achieve permanency remain with their permanent family and do not re-enter foster care in a short period of time. Specifically, Metric 6.3 measures re-entry to foster care within 12 months of a child’s discharge to permanency (not including adoption) in the 12-month period prior to the reporting period.

The baseline for this metric is 10.3 percent of children re-entering care; the final target set for June 30, 2016 is no more than 8.2 percent of children re-entering care. For this period, DHS reported that of the 2,682 children who discharged to permanency (not including adoption) between April 1, 2013 and March 31, 2014, 230 children re-entered care within 12 months, which represents 8.6 percent of child re-entries. DHS’ performance has slightly declined from the last reporting period, ending the trend of three consecutive periods of positive

performance. However, DHS’ performance to date represents an overall positive trend toward the Target Outcome and improved performance from the starting baseline. DHS leadership reported that it believes recent implementation of safety case reviews will ensure that re-entry outcomes remain strong. Based on an examination of data and information throughout the period, the Co-Neutrals find that DHS has made good faith efforts to achieve substantial and sustained progress for Metric 6.3.

Figure 25: Metric 6.3 – Re-entry within 12 Months of Exit



Permanency for Older Legally-Free Youth, Metric 6.4

This metric measures the experience of a cohort of legally free youth who turned 16 years of age within two to three years before the report period and tracks those children to measure: the percentage of these youth who exited foster care to permanency by age 18; the percentage who remain in care after age 18; and, the percentage who exit care without permanency. The interim and final Target Outcomes for this metric are set only for the percentage of youth who will achieve permanency, while the other outcomes of youth exiting care without permanency or remaining in care are publicly reported to provide transparency into the overall experience of these youth.

DHS’ baseline for this permanency metric was set at 30.4 percent of youth exiting with a permanent family. Two interim targets were set, the first of which is 50 percent of youth exiting to permanency by December 31, 2014, and the second with 75 percent exiting to permanency by December 31, 2015. The final target is set at 80 percent by June 30, 2016.

For this period, DHS reported that 146 legally free children turned 16 years old between April 1, 2012 and March 31, 2013. Thirty-seven of these children, representing 25.3 percent, achieved permanency as follows:

- Twenty-six youth were adopted;
- Seven youth exited through guardianship;
- Three youth were reunified with their families; and,
- One youth exited through custody to a relative.

Twenty-two youth (15.1 percent) remained in care on the last day of the reporting period. What is significantly concerning is the fact that 87 (59.6 percent) of the 146 youth in the cohort exited the state’s custody without permanency.⁴⁰

As shown in the table below, performance outcomes have been below the baseline in all four reporting periods and fall well-short of the 50 percent interim permanency target established for December 31, 2014.

Table 11: Permanency Performance for Metric 6.4

Permanency Metric	Baseline	Reported Jan 2014	Reported July 2014	Reported Jan 2015	Reported July 2015	Target
6.4: Among legally free foster youth who turned 16 in the period 24 to 36 months prior to the report date the percent that: exited to permanency by age 18; stayed in foster care after age 18; and, exited without permanency by age 18.	30.4% (July '09-June '10)	20.7%	26.9%	25.0%	25.3%	50.0% by 12/31/14 75.0% by 12/31/15 80.0% by 6/30/16

DHS reports that it continued to convene Permanency Roundtables (PRT) as a key strategy for legally free youth 16 years of age or older who are at risk of aging out of foster care without permanency. The goal of a PRT is to identify barriers to permanency, to engage a team of partners to brainstorm creative solutions to those barriers, and to design an individualized permanency action plan. DHS reported that it completed before the end of the previous performance period PRTs for 143 youth who were legally free and ages 16 or older. As described in the last commentary, DHS reported that the data gathered to determine whether or not PRTs have been successfully implemented was inconclusive. DHS leadership reported to

⁴⁰ Three of the 87 youth who exited without permanency were transferred to another agency, and their final permanency outcomes are, as result, unknown.

the Co-Neutrals that they continued to evaluate PRT implementation to ensure the agency had the capacity to implement the model with fidelity and to determine the populations of youth for whom PRTs would continue to be conducted.

Throughout this report period, DHS reports that it conducted 48 additional PRTs. However, the permanency outcomes for this group of children indicate that the PRT as a strategy to achieve positive outcomes is not producing the intended result. That is not a new conclusion, as discussed in the previous commentary. DHS leadership reports that they have, however, garnered helpful information from PRT implementation that the agency has used to develop new core strategies to improve the permanency outcomes for older youth. For this report period, however, the Co-Neutrals do not find that DHS has made good faith efforts to achieve substantial and sustained progress toward the Target Outcome for Metric 6.4.

Timeliness to Adoption for Children who become Legally Free, Metric 6.5

Metric 6.5 measures the timeliness to adoption for children who became legally free for adoption in the 12 months prior to the reporting period. The baseline for this metric was established at 54.3 percent with the performance target set at 75 percent. In January 2014, DHS’ first reported performance data for this metric at 60.9 percent – 6.6 percent above the baseline. For the following two report periods, DHS’ performance declined and moved below the established baseline. In the current reporting period, DHS reported that of the 1,797 children who became legally free between April 1, 2013 and March 31, 2014, 935 (52 percent) were adopted within 12 months of becoming legally free. DHS has not achieved improved performance outcomes against the starting baseline in four consecutive report periods.

Table 12: Permanency Performance for Metric 6.5

Permanency Metric	Baseline	Reported Jan 2014	Reported July 2014	Reported Jan 2015	Current Report July 2015	Target
6.5: Of children who became legally free in the 12 months before the report period, the percent that were discharged from foster care to a finalized adoption in less than 12 months from the date of becoming legally free.	54.3%	60.9%	55.6%	51.9%	52.0%	75.0%

DHS reported that it began to focus on improved timeliness to adoption for legally free children with an identified placement on January 1, 2015. As discussed previously, DHS identified 795 children in this status and set a target date of June 30, 2015 to finalize adoptions and/or achieve permanency for the identified children. DHS developed targeted action plans for each

child, and developed an adoption tracking report to monitor progress. DHS also held bi-weekly staff meetings to assess progress. As a result, 574 of the 795 children have achieved permanency. The Co-Neutrals believe that these efforts will likely result in improved outcomes that are visible in the next report period and the Co-Neutrals find that DHS has made good faith efforts to achieve substantial and sustained progress toward the Target Outcome established for Metric 6.5.

Adoption Permanency, Metrics 6.6, and 6.7

The remaining permanency metrics (6.6 and 6.7) measure how well DHS avoids pre-adoption placement disruptions and post-adoption finalization dissolutions.

Metric 6.6 measures the percentage of adoption placements that do not disrupt over a 12-month period, of all new trial adoption placements during the previous 12-month period. The baseline for this metric was set at 97.1 percent and the Target Outcome was set at 97.3 percent. DHS' performance has remained relatively flat in all report periods, including the current period, showing DHS' outcomes below the starting baseline. See Table 13 below. For this reporting period, DHS' data shows that of the 1,297 children who entered a trial adoption placement between April 1, 2013 and March 31, 2014, 1,252 children (96.5 percent) did not disrupt within 12 months of entering trial adoption. Forty-five children experienced disruptions in their adoption placements, which represents a performance outcome below the starting baseline. DHS has not yet implemented strategies to reduce the percentage of children whose adoption placements disrupt and the Co-Neutrals do not find that DHS has made good faith efforts to achieve substantial and sustained progress toward the Target Outcome for Metric 6.6.

Metric 6.7 measures the percentage of children who achieved permanency through adoption over a 24-month period and did not experience adoption dissolution within 24 months of adoption finalization. The baseline for this metric was established at 99.0 percent and the Target Outcome was set at 99.0 percent. For this reporting period, DHS' data shows that, of the 2,950 children who were adopted between April 1, 2011 and March 31, 2013, 2,945 children (99.8 percent) did not disrupt within 24 months of being adopted. DHS has consistently exceeded the Target Outcome for this metric, including the current and last three performance periods. See Table 13 below. The Co-Neutrals find DHS has made good faith efforts to achieve substantial and sustained progress for Metric 6.7.

Table 13: Permanency Performance Metrics 6.6 and 6.7

Permanency Metric	Baseline	Reported Jan 2014	Reported July 2014	Reported Jan 2015	Current Report July 2015	Target June 2013
6.6: Percent of adoption placements that did not disrupt over a 12-month period, of all trial adoption placements during the previous 12-month period.	97.1%	96.2%	96.4%	96.4%	96.5%	97.3%
6.7: Percent of children whose adoption was finalized over a 24-month period who did not experience adoption dissolution within 24 months of finalization.	99.0%	99.7%	99.7%	99.7%	99.8%	99.0%

Appendix A: Metric Plan Baselines and Targets (Updated September 2015)

Oklahoma Department of Human Services Compromise and Settlement Agreement in D.G. v. Henry

Under Section 2.10(f) of the CSA, the Co-Neutrals shall issue Baseline and Target Outcomes, which shall not be subject to further review by either party but may at the discretion of the Co-Neutrals, after providing the parties an opportunity to comment, be revised by the Co-Neutrals. These Baselines and Target Outcomes are currently in effect.

1. MALTREATMENT IN CARE (MIC)			
Metric	Reporting Frequency	Baseline	Target
1.A: Of all children in foster care during the reporting period, what percent were not victims of substantiated or indicated maltreatment by a foster parent or facility staff member in a 12 month period.	Semi-Annually, in the January and July monthly reports	98.73% (April 2013 – March 2014)	99.68%
1.A (2): Number of children in the legal custody of OKDHS, found to have been maltreated by a resource caregiver over the 12 month period.	Monthly	N/A	N/A
1.B: Of all children in legal custody of OKDHS during the reporting period, what number and percent were not victims of substantiated or indicated maltreatment by a parent and what number were victims.	Semi-Annually, in the January and July monthly reports	98.56% (Oct 2011 – Sept 2012)	99.00%
1.B (2): Number of children in the legal custody of OKDHS, found to have been maltreated by a parent over the 12 month period.	Monthly	N/A	N/A

2. FOSTER AND THERAPEUTIC FOSTER CARE (TFC) HOMES				
Metric	Reporting Frequency	Target SFY 14*	Target SFY 15*	Target SFY 16*
2.A: Number of new foster homes (non-therapeutic, non-kinship) approved for the reporting period.**	Monthly	1,197 (July 1, 2013 Baseline: 1,693)	End of Year: 904 Interim Target: 678 by 3/31/15 (July 1, 2014 Baseline: 1,958)	End of Year: 1,054 Interim Targets: 12/31/2015: 527 3/31/2016: 790 6/30/2016: 1,054 (July 1, 2015 Baseline: 1,858)
Net gain/loss in foster homes (non-therapeutic, non-kinship) for the reporting period***	Semi-Annually, in the January and July monthly reports	615	356	534
2.B: Number of new therapeutic foster homes (TFC) reported by OKDHS as licensed during the reporting period.	Monthly	150 (July 1, 2013 Baseline: 530)	150 (July 1, 2014 Baseline: 473)	172 Interim Targets: 12/31/2015: 86 3/31/2016: 129 6/30/2016: 172 (July 1, 2015 Baseline: 437)
Net gain/loss in therapeutic foster homes (TFC) for the reporting period.	Semi-Annually, in the January and July monthly reports	n/a	56	81

* By May 30 of each year, DHS shall conduct annual trend analysis to set annual targets for the total number of new homes developed and the net gain for foster and TFC homes needed to meet the needs of children in and entering care. The Co-Neutrals also set an interim target of newly approved homes for the year.

** DHS and the Co-Neutrals established criteria for counting new non-kin foster and TFC homes toward the annual targets set under 2.A and 2.B.

*** DHS and the Co-Neutrals established a methodology for counting net gains/losses of non-kin foster and TFC homes.

3. CASEWORKER VISITS			
Metric	Reporting Frequency	Baseline	Target
3.1: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between caseworkers and children in foster care for at least 1 calendar month during the reporting period.	Monthly	95.5% (July 2011-June 2012)	95%
3.2: The percentage of the total minimum number of required monthly face-to-face contacts that took place during the reporting period between primary caseworkers and children in foster care for at least 1 calendar month during the reporting period.	Monthly	51.2% (July 2011-June 2012)	Final: 90% Interim – Last reported month of: FFY 2013 - 65% FFY 2014 - 70% FFY 2015 - 80% FFY 2016 – 90%
3.3(a): The percentage of children in care for at least three consecutive months during the reporting period who were visited by the same primary caseworker in each of the most recent three months, or for those children discharged from OKDHS legal custody during the reporting period, the three months prior to discharge. Phase One: for period Jan – Dec 2012 <i>This metric is no longer reported on</i>	Semi-Annually, in the January and July monthly reports	53% (January - June 2013)	75%
3.3(b): Percentage of children in care for at least six consecutive months during the reporting period who were visited by the same primary caseworker in each of the most recent six months, or for those children discharged from OKDHS legal custody during the reporting period, the six months prior to discharge. Phase Two: for period Jan 2015 until the end of the Compromise and Settlement Agreement (CSA)	Semi-Annually, in the January and July monthly reports	40.6% (January 2013 – June 2014)	65%

4. PLACEMENT STABILITY			
Metric	Report Frequency	Baseline	Target – by June 30, 2016
4.1 (a): Percent of children in legal custody of OKDHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 8 days but less than 12 months, the percentage that had two or fewer placement settings.	Semi-Annually, in the January and July monthly report -same for all placement stability metrics	70% (Oct 2011 – Sept 2012)	88%
4.1(b): Percent of children in legal custody of OKDHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 12 months but less than 24 months, the percentage that had two or fewer placements.	Same	50% (Oct 2011 – Sept 2012)	68%
4.1(c): Percent of children in legal custody of OKDHS that experience two or fewer placement settings: Of all children served in foster care during the year who were in care for at least 24 months, the percentage that had two or fewer placement settings.	Same	23% (Oct 2011 – Sept 2012)	42%
4.2: Of those children served in foster care for more than 12 months, the percent of children who experienced two or fewer placement settings <i>after</i> their first 12 months in care.	Same	74% (Apr 2012 – Mar 2013)	88%
4.3: Of all moves from one placement to another in the reporting period, the percent in which the new placement constitutes progression toward permanency. (Note: the Co-Neutrals have suspended this metric.)	N/A	N/A	N/A

5. SHELTER USE			
Metric	Report Frequency	Baseline (January-June 2012)	Target
5.1: The number of child-nights during the past six months involving children under age 2 years.	Monthly Analysis of usage every 6 months – same for all shelter metrics	2,923 child-nights	0 by 12/31/12
5.2: The number of child-nights during the past six months involving children age 2 years to 5 years.	Same	8,853 child-nights	0 by 6/30/13
5.3: The number of child-nights during the past six months involving children age 6 years to 12 years.	Same	20,147 child-nights	0 for children 6-7 by 7/1/14 0 for children 8-9 by 10/1/14 0 for children 10-12 by 1/1/15 unless in a sibling group of 3 or more 0 for children 10-12 by 4/1/15 unless with a sibling group of 4 or more
5.4: The number of child-nights during the past six months involving children age children 13 years or older.	Same	20,635 child-nights	Interim Target by 6/30/15 # child-nights: 13,200 80% of children 13+ in shelters will meet Pinnacle Plan (PP) Point 1.17 rules* Final Target by 6/30/16 # child-nights: 8,850
1.17: Number of children ages 13 or older in shelters that had only one stay for less than 30 days.		33.7% (January-June 2014)	90% of children 13+ in shelters will meet PP Point 1.17 rules

* Pinnacle Plan Point 1.17: “By June 30, 2014, children ages 13 years of age and older may be placed in a shelter, only if a family-like setting is unavailable to meet their needs. Children shall not be placed in a shelter more than one time within a 12-month period and for no more than 30 days in any 12-month period. Exceptions must be rare and must be approved by the deputy director for the respective region, documented in the child’s case file, reported to the division director no later than the following business day, and reported to the OKDHS Director and the Co-Neutrals monthly.

6. PERMANENCY			
Metric	Report Frequency	Baseline	Target
6.1: Of all children who were legally free but not living in an adoptive placement as of January 10, 2014 ⁴¹ , the number of children who have achieved permanency.	Semi-Annually, in the January and July monthly reports - same for all permanency metrics	Jan 10, 2014 Cohort 292 children	90% of children ages 12 and under on Jan 10, 2014 will achieve permanency 80% of children ages 13 and older on Jan 10, 2014 will achieve permanency
6.2(a): The number and percent of children who entered foster care 12-18 months prior to the end of the reporting period who reach permanency within one year of removal, by type of permanency.	Same	Total = 35% Reunification = 31.4% Adoption = 1.6% Guardianship = 2%	Total = 55%
6.2(b): The number and percent of children who entered their 12 th month in foster care between 12-18 months prior to the end of the reporting period who reach permanency within two years of removal, by type of permanency.	Same	Total = 43.9% Reunification = 22.3% Adoption = 18.9% Guardianship = 2.7%	Total = 75%
6.2(c): The number and percent of children who entered their 24 th month in foster care between 12-18 months prior to end of reporting period who reach permanency within three years of removal, by type of permanency.	Same	Total = 48.5% Reunification = 13.0% Adoption = 32.7% Guardianship = 2.9%	Total = 70%
6.2(d): The number and percent of children who entered their 36 th month in foster care between 12-18 months, prior to the end of the reporting period who reach permanency within four years of removal.	Same	Total = 46.6% Reunification = 8.8% Adoption = 37.3% Guardianship = .4%	Total = 55%

⁴¹ The legally free cohort for Metric 6.1 was to be set originally on March 7, 2013, the date the Metrics Plan was finalized, but due to since-corrected data challenges the cohort was established for January 10, 2014.

6. PERMENACY			
Metric	Report Frequency	Baseline	Target
6.3 Of all children discharged from foster care in the 12 month period prior to the reporting period, the percentage of children who re-enter foster care during the 12 months following discharge.	Same	10.3% Discharged year ending 9/30/11 re-entered as of 9/30/12	8.2%
6.4: Among legally free foster youth who turned 16 in the period 24 to 36 months prior to the report date, the percent that exited to permanency by age 18; stayed in foster care after age 18, and exited without permanency by age 18.	Same	30.43% (July 2009-June 2010)	50% by 12/31/14 75% by 12/31/15 80% by 6/30/16
6.5: Of all children who became legally free for adoption in the 12 month period prior to the year of the reporting period, the percentage who were discharged from foster care to a finalized adoption in less than 12 months from the date of becoming legally free.	Same	54.3% (Oct 2011-Sept 2012)	75% by June 30, 2016
6.6: The percent of adoptions that did not disrupt over a 12 month period, of all trial adoptive placements during the previous 12 month period.	Same	97.1% (Apr 2008-Mar 2010)	97.3%
6.7: The percent of children whose adoption was finalized over a 24 month period who did not experience dissolution within 24 months of finalization.	Same	99%	99%

7. CASELOADS				
Metric	Report Frequency	Standard	Baseline	Target
Supervisors	Quarterly, every Jan, April, July and Oct – same for all caseloads	1:5 ratio	58.8% (as of June 30, 2014)	90% meet standard by June 30, 2014
Child Protective Services (CPS)	Same	12 open investigations or assessments	Same Baseline for All Case Carrying Workers: <i>27% - meet standard</i> <i>8% - 1-20% above standard</i> <i>65% - 21%+ above standard</i>	Same Interim Target for All Case Carrying Workers – by Dec 31, 2013: <i>45% - meet standard</i> <i>30% - 1-20% above standard</i> <i>25% - 21%+ above standard</i> Final Target: 90% of all workers meet their standard by June 30, 2014
OCA (Office of Client Advocacy)	Same	12 open investigations		
Family Centered Services (FCS)	Same	8 families		
Permanency	Same	15 children		
Foster Care	Same	22 families		
Adoption	Same	8 families & 8 children		

Appendix B: November 2014 Remedial Order

D.G. vs. Yarborough

Case No. 08-CV-074

Remedial Order

Based on the findings of the Co-Neutrals' Commentaries issued in October 2013, April 2014 and October 2014, and pursuant to Section 2.14 of the *D.G. v Yarborough* Compromise and Settlement Agreement, the Oklahoma Department of Human Services (DHS) is hereby directed to undertake and maintain the following diagnostic and remedial activities:

1) Foster Homes

- a) DHS shall immediately identify systemic barriers that prevented the agency from making substantial and sustained progress toward achieving its new foster home Target Outcome for SFY14.
- b) DHS shall review its current core strategies to develop new foster homes, evaluate the effectiveness of those strategies, and ensure that all tools available to DHS to achieve the foster home Target Outcomes are incorporated into a remediation plan.
- c) DHS shall develop and submit to the Co-Neutrals by January 10, 2015 a remediation plan, with proposed timeframes, designed to ensure DHS achieves its foster home Target Outcomes for SFY15. The remediation plan shall be subject to the approval of the Co-Neutrals, and upon Co-Neutral approval, DHS shall immediately implement the remediation plan.
- d) Director Lake shall, by November 30, 2014, identify a senior DHS staff person responsible for continually assessing progress and identifying barriers toward achieving the foster home Target Outcomes. This individual shall serve as the DHS liaison to the Co-Neutrals for all matters related to the foster home performance area.

2) Caseloads

- a) DHS shall prepare weekly caseload and position management reports that identify the following for every district office:
 - i) The number of caseworker positions allocated to the district.
 - ii) The list of caseworkers currently employed (list their caseload carrying capacity under graduated caseloads – 0%, 25%, 50% and 100%).
 - iii) The caseloads for each caseworker.

- iv) The number of caseworkers (by type) needed to achieve 90 percent caseload compliance based on the previous week's workload.
- v) The number of vacant caseworker positions available to fill.
- vi) The number of vacant caseworker positions posted to fill.
- vii) The number of caseworker positions vacated and/or new resignations or transfers announced during the previous week.

While the primary purpose of the weekly caseload and position management report is for DHS leadership to track progress and manage toward better outcomes, DHS will also submit these reports weekly to the Co-Neutrals. Starting on December 1, 2014, DHS will submit to the Co-Neutrals its first weekly report, containing all the data elements listed above for which DHS already has the capacity to report. By February 28, 2015, DHS will provide weekly reports to the Co-Neutrals that include all the data elements set forth above.

- b) By January 10, 2015, DHS shall identify a set of priority districts that have the highest needs in terms of caseloads, vacancies and turnover. The priority districts will be identified using criteria proposed by DHS based on a threshold of a percentage of workers who are above the caseload carrying standard, a percentage of vacancies and a rate of turnovers. The Co-Neutrals will review and approve DHS' proposed criteria and selected list of priority districts. Once the set of priority districts have been identified and approved, DHS shall provide monthly reports to the Co-Neutrals on targeted strategies to hire and retain caseworkers for this priority set of districts. These plans shall include the results of diagnostic assessments of any barriers to hiring and retention in the targeted district offices and strategies to overcome those barriers.
- c) DHS shall produce and submit to the Co-Neutrals monthly reports on its plans and progress toward implementing graduated caseloads and the field mentor training program, two core caseload strategies DHS included in the Pinnacle Plan.
- d) Director Lake shall identify a senior DHS person responsible for continually assessing the weekly caseload and position management reports to identify barriers (short-term, long-term, local and statewide) and opportunities to achieve substantial and sustained progress toward caseload Target Outcomes. This individual shall serve as the DHS liaison to the Co-Neutrals for all matters related to the caseload performance area. The Co-Neutrals direct that this same person will engage in weekly calls with all District Directors in priority districts and monthly calls with all remaining District Directors related to progress and challenges with caseloads, retention and hiring.

3) Child Protective Services (CPS) Investigation Backlog

- e) DHS shall develop and submit to the Co-Neutrals by December 15, 2014 a remediation plan to reduce its backlog of overdue CPS investigations. The remediation plan shall identify current barriers to DHS' completing investigations within the required 60-day timeframe and core strategies DHS will employ to reduce the backlog. DHS' remediation plan will propose interim targets and dates for backlog reduction and a final target date for eliminating the backlog.
- f) Director Lake shall identify a senior DHS person responsible for continually assessing progress or negative trending with the backlog reduction and identifying barriers (short-term, long-term, local and statewide) to timely completions of CPS investigations. This individual shall serve as the DHS liaison to the Co-Neutrals for all matters related to the CPS investigation backlog.

This order is effective upon publication which is the date noted below.

By:



Eileen Crummy

Co-Neutral



Kathleen Noonan

Co-Neutral



Kevin Ryan

Co-Neutral

Dated: November 14, 2014

Appendix C: Core Strategies SFY16

Core Strategy #1: Hiring and Retention of Staff		
<p>Strategy 1:</p> <p>Use integrated caseload management report on a weekly basis at the statewide, district and supervisory level to track and manage hiring, retention and caseloads (attached).</p>	<p>Strategy 2:</p> <p>Hire staff to fill vacant positions and create 457 new positions to meet caseload standards.</p>	<p>Strategy 3:</p> <p>Implement graduated caseload standards to support and retain new staff.</p>
<p>Activities:</p> <ul style="list-style-type: none"> • Develop district specific staffing and retention plans for 10 target districts. • Create a new performance expectation that deputy directors meet with district directors to review caseload management report, with district directors meeting with supervisors to do the same • Weekly phone call with 10 priority districts to assess progress, identify barriers, and brainstorm solutions • Create a Statewide Retention Planning Steering Committee • All district offices to create and implement a staff retention plan informed by data with the Steering Committee acting as the driver of this effort • Assess progress of statewide staffing/ workload reduction plan on a bi-monthly basis as a joint effort by CWS Executive Team exec team • Improve and streamline hiring process timelines from posting to start date. 	<p>Activities:</p> <ul style="list-style-type: none"> • Post and fill new positions at a rate of 75 per month from February 2014 to July 2015. • Bi-monthly meetings with planning committee composed of Facilities Management, Human Resources, Finance, and Child Welfare Leadership to plan, assess progress, and identify and remove barriers. 	<p>Activities:</p> <ul style="list-style-type: none"> • District Directors review workload report and meeting with supervisors on a weekly basis to monitor and assess progress • Deputy Directors or review workload report and meeting with district directors to monitor and assess progress

Core Strategy #2: Resource Home Recruitment- TFC

Strategy 1:

Facilitate contract process with TFC provider agencies to develop measures for new TFC contracts.

Activities:

- Establish performance measures with TFC agencies through facilitated discussion of national treatment foster care standards by 5/15.
- Finalize negotiated performance measures and other contract specifications with DHS Contracts and Purchasing Unit, TFC agencies, and CWS Office of Operations and Business Processes by 7/1/15.
- Establish core agreements that outline accurate bed availability with data quality feedback loops between TFC liaisons, KIDS data staff, and TFC agencies by 5/15.
- Determine placement need through management of child wait list through the assignment of roles and responsibilities for DHS TFC staff and TFC agencies' staff.
 - DHS will provide monthly information to TFC agencies via e-mail or agency preferred contacts at the beginning of each month to provide TFC agencies with trending data on location/age/need by district or county of TFC beds by 8/1/15.
 - TFC agencies will consistently monitor placement vacancies and report on such weekly to determine availability for children on wait list.
 - Monitor use of fiscal incentives to determine impact on total bed days, placement stability, acceptance of children with special needs, etc. through the use of monthly "report cards." Initial planning indicates these will be available by 9/15.

Strategy 2:

Develop an accurate bed availability process.

Activities:

- In the first week of every month starting 7/1/15, DHS will provide TFC agencies with a spreadsheet from KIDS detailing current DHS information regarding placement, availability, and preferences.
- The TFC agencies will make needed corrections to the spreadsheet and return it to DHS no later than the Friday ending the second week of the month beginning 7/1/15.
- DHS staff will input changes into the KIDS system ensuring reasonably accurate information exists beginning 7/1/15.
- Beds having no placement for more than 30 days will be staffed with DHS to determine their actual availability. Beds identified as non-respite and that do not appear to be viable placements in the next 30 days will be removed from the available placement list.

Core Strategy #2: Resource Home Recruitment- Foster Care Part 1

Strategy 1: Increase Internal DHS Capacity to recruit, retain, and support foster families.	Strategy 2: Develop a statewide performance based contract offered by 1-1-16 to any agency interested in recruitment, approval and support of foster families.	Strategy 3: Implement QA Process for foster care utilizing data.
Activities: <ul style="list-style-type: none"> • Recruitment teams in each region <ul style="list-style-type: none"> ○ Each region will have a recruitment team made up of a Supervisor and five Child Welfare Specialists. The recruitment units will be supervised by foster care program staff. The recruitment units will be identified and in place by 10/15/15. ○ Develop and implement an internal recruitment, approval and support protocol by 10/31/15. • Increased staffing <ul style="list-style-type: none"> ○ With an increased number of approved foster homes, it is anticipated there will be a need for additional foster care staff. A program staff person will review the workload report monthly from a statewide perspective to determine what adjustments need to be made to field staffing levels and make recommendations to the Foster Care and Adoption Deputy Director. The initial workload review will take place the first week of November and the first week of each month thereafter. 	Activities: <ul style="list-style-type: none"> • Require all agencies have a targeted recruitment plan based on data provided by DHS within 30 days of the signed contract. DHS and the agency will jointly review and update the recruitment plan quarterly. 	Activities: <ul style="list-style-type: none"> ▪ Assess the process from inquiry to approval throughout each agency <ul style="list-style-type: none"> ○ Identify problem areas with initial review completed by 11/15/15. ○ Foster care program staff will assist the agencies to develop a plan to address identified areas of need. The plan will include a monitoring component. These activities will commence following the initial review at 60 day intervals. • Identify and implement specific supports to increase retention of current foster families <ul style="list-style-type: none"> ○ The established Foster Parent Support workgroup will continue efforts to implement the Support Is Everyone's Job campaign as well as exploring additional community supports for foster families. ○ Provide additional support during CPS investigations through development of a protocol for the role of foster care staff by 12/31/15. ○ Beginning 9/30/15, program staff will monitor foster parent social media sites to identify and address concerns and provide additional supports to foster families. ○ Beginning November 2015, Foster care field managers and supervisors will contact two foster families (randomly selected) each month. The purpose of the calls is to improve customer service and identify supports foster parents find most helpful through use of a questionnaire. The completed questionnaires will be analyzed to identify trends and/or additional needs of foster families. This information will be provided to the foster parent support workgroup on a quarterly basis to develop plans at enhancing the identified needed supports.

Core Strategy #2: Resource Home Recruitment- Foster Care Part 2

<p>Strategy 4:</p> <p>Develop and implement a statewide recruitment plan.</p>	<p>Strategy 5:</p> <p>Explore, identify, and implement a resource family model that focuses on families serving children in DHS custody.</p>	<p>Strategy 6:</p> <p>Develop continuum of placements.</p>
<p>Activities:</p> <ul style="list-style-type: none"> • DHS will develop a comprehensive and data-driven assessment of placement needs for children in DHS custody incorporating lessons learned from shelter case reviews and placement needs. This needs assessment will be completed by 12/31/15. • Develop monthly goals per agency to begin October 2015. • Continue to share child and foster home demographics monthly with each agency. • Review all pending foster home applicants including DHS applicants in the approval pipeline weekly to identify and resolve barriers to approval. This process is currently in place for RFP agencies and will continue. The review of foster homes in process with DHS will commence by 11/1/15. • Statewide Recruitment Campaign led by Governor's office with kick off on 11/12/15. 	<p>Activities:</p> <p>Convene a workgroup to research resource family models. This group will be responsible for development and implementation of Oklahoma's Resource Family Model with a goal of streamlining the adoption and foster care process. The workgroup will include private foster care and adoption agencies in an effort to improve partnerships and will convene by 11/30/15. When areas of improvement are identified that appear to be easily implemented, recommendations from the group will be provided. The group will provide initial findings and an overall recommendation for an Oklahoma model by 3/31/16.</p>	<p>Activities:</p> <ul style="list-style-type: none"> • By 12/1/15 incorporate information learned from shelters into recruitment work for new resource homes, including TFC homes. • By 11/1/15 initiate collaboration with Oklahoma Nurses Association to conduct targeted outreach to nurses across the state to encourage them to open a resource home for children with special medical needs. • By 12/1/15 identify barriers and develop solutions to any barriers preventing placement of children with special needs in existing TFC homes and group homes. • By 1/15/16 create a comprehensive strategy to expand placement resources along a full continuum.

Core Strategy #3: Statewide Reduction of Shelter Usage

<p>Strategy 1:</p> <p>Discontinue the use of two DHS operated shelters.</p>	<p>Strategy 2:</p> <p>Assist in informing development of a continuum of placements in collaboration with foster care, TFC, and SPPU.</p>	<p>Strategy 3:</p> <p>Continue to build on the Oklahoma Association of Youth Services (OAYS) partnership.</p>
<p>Activities:</p> <ul style="list-style-type: none"> • By 10/1/2015 the Shelter Authorization Form will be updated and applied to every child entering a shelter. • By 11/1/15 the shelter placement process, including multiple levels of accountability, will be in place. • By 11/1/15 DHS will complete an analysis of “lessons learned” from the closure and placement of children from the Pauline Mayer Shelter, to include information regarding foster care, specialized placements, therapeutic foster care, etc. This report will include information on what was learned about placement needs based on the multidisciplinary staffing process, how DHS utilizes resources, availability of resources, staff and caregiver competencies. This analysis will include recommend changes to DHS policy and procedures. • By 12/1/15 statewide training of the updated shelter placement process will be completed. • By 2/1/16 information from the closure of the Laura Dester Shelter will be added to the analysis report. 	<p>Activities:</p> <ul style="list-style-type: none"> • By 11/1/15 provide foster care and TFC information learned from shelters to incorporate into recruitment work for new resource homes focused on children with special medical and developmental needs. • By 2/15/16 review the placement needs assessment developed by foster care to incorporate lessons learned from shelter case reviews and placement needs (Core Strategy 2, Strategy 6). 	<p>Activities:</p> <ul style="list-style-type: none"> • Continue work with OAYS to create a long-term partnership that focuses on community supports and services rather than shelter care for DHS custody youth. • By 11/1/15 the <i>Provider Exchange</i> will be begin implementation with OAYS. • By 12/1/15 implement a multidisciplinary review process to rapidly move children placed in shelters across the state. • By 12/1/15 the current multidisciplinary staffing model will be expanded to the regional level by identifying specific individuals to serve as multidisciplinary team leads for each region. The reporting structure and process will be determined prior to rolling out the staffing model.

Core Strategy #4: Permanency- Adoption Timeliness Accountability Teams

<p>Strategy 1:</p> <ul style="list-style-type: none"> Continue statewide coordination of Phase I activities through the Adoption Timeliness Accountability Teams (ATATs). 	<p>Strategy 2:</p> <ul style="list-style-type: none"> Local Implementation of Adoption Timeliness Accountability Teams (ATATs).
<p>Activities:</p> <ul style="list-style-type: none"> Evaluate success of Phase I implementation by 7/30/15. Identify activities that led to the success in Phase 1 implementation. Enhance Phase I strategy by 9/1/15. Remove cohort focus; focus instead on all children with a goal of adoption who are in identified placements. Review current staff roles to incorporate needed accountabilities for successful project strategies. Develop plan to incorporate the activities that led to successes in Phase 1 into daily work. Pilot local teams using identified model in Region 1. Continue statewide ATATs' processes to assist with reducing the time to permanency for children with a goal of adoption. 	<p>Activities:</p> <ul style="list-style-type: none"> Investigate potential regionally-focused ATATs using data gathered from Phase I permanency data by 8/15/15. Develop pilot implementation plan for ATATs targeting Region 1 to rollout by Districts 1 & 26 (paired), 2, 4 & 10 (paired), and 9, by 9/1/15. Review pilot project in Region 1 and make needed adjustments to implementation plan to prepare for statewide rollout by 12/1/15. Implement local ATATs statewide to identify and reduce barriers to adoption, thereby increasing permanency for children in identified placements by 12/31/15. Review implementation of new processes to ensure fidelity and increased timeliness to adoption by 3/31/16.

Core Strategy #4: Permanency- Targeted Permanency Consultation

<p>Strategy 1:</p> <p>Develop an ongoing safety focused permanency consultation process for children with a goal of reunification.</p>	<p>Strategy 2:</p> <p>Implement permanency consultations in priority districts.</p>	<p>Strategy 3:</p> <p>Implement permanency consultations statewide.</p>
<p>Activities:</p> <ul style="list-style-type: none"> Develop permanency consultation tool focused on identifying safety throughout the life of the permanency planning case by 6/15/15. Develop timeframes and guidelines for permanency consultations by 7/15/15. 	<p>Activities:</p> <ul style="list-style-type: none"> Identify Districts that are close to reaching workload standards by 6/1/15. Use data from Chapin Hall analysis to identify Districts with below average permanency achievement performance by 6/15/15. Roll out consultations in these Districts first combined with Chapin Hall needs analysis by 8/1/15. 	<p>Activities:</p> <ul style="list-style-type: none"> Develop an implementation team by 6/15/15 that will start the rollout in identified districts and serve as the ongoing implementation team. After rollout in identified districts develop a process, based off the results of the implementation site, to rollout state wide by 12/31/15.

Core Strategy #4: Permanency- Targeted Family Finding and Engagement

Strategy 1:

Complete Kinship Searches on all children in identified Quad 2 baseline cohort in first 90 days beginning 6/1/15.

Activities:

- Identify children in cohort in need of a kinship searches that have not had a diligent search completed within the last 12 months.
- Divert one full time individual to complete 25 kinship searches in the first 30 days.
- Implement kinship searches on remaining 122 children in original cohort over next 60 days.
- Create a management process to ensure timely completion of diligent searches on target cohort by 6/5/15.

Strategy 2:

Implement an expedited permanency process for identified permanent placements for children in cohort who are not in a family like setting or who are in need of placement by 7/31/15.

Activities:

- Assemble a taskforce reflecting programs and field staff by 6/30/15 with the purpose of developing the expedited process for permanency as well as identifying staff to serve as permanency expeditors to pilot this process for this population. The process will then be explored for use with all placement types and all children being placed. Tasks of the group will include:
 - Examining placement processes across all programs, streamlining the process by discontinuing any duplicated efforts.
 - Identifying and defining any exceptions that can be made when approving placement providers that in no way compromises the safety of the children in the home.
 - Exploring dissemination of the plan for all types of placements.
- Field managers and district directors will monitor progress through weekly conference calls.
 - An expedited placement plan will be developed for this population by 7/31/15.
 - The taskforce will meet one time per month on 7/13/15, 8/10/15, and 9/14/15 to streamline statewide placement process.

Core Strategy #5: Elimination of Overdue Investigations and Assessments

Strategy goals met. In maintenance.

Core Strategy #6: Maltreatment in Care- Facilities Part 1

Strategy 1:

By 9/1/15 develop a comprehensive protocol that clearly delineates the use of Immediate Protective Action Plan (IPAP), Corrective Action Plan (CAP), Facility Action Step (FAS), Facility Services Plan (FSP), Notice to Comply (NTC), and Written Plan of Compliance (WPC), all of which will be implemented and consistently monitored by the same individual within DHS system wide, by 11/1/15. Targeted implementation will begin 9/1/15. (System wide due date is a result of implementation being contingent upon changes occurring in KIDS, DHS will continually monitor to expedite if possible).

Activities:

- OCA will establish written policy regarding:
 - Within 24 hours of the creation of or changes to an IPAP, OCA staff will notify the SPPU facility liaison either electronically or telephonically that an IPAP has been established and will upload the established/updated IPAP into the KIDS file cabinet.
 - Within 5 business days of the completion of an investigation OCA staff will send the exit notice electronically to SPPU program staff.
 - Prior to system wide implementation: Practices identified above will occur with all investigations related to the top ten agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/1/15.
- Identify clearly the purpose of IPAP, CAP, FAS, FSP, NTC, and WPC in an integrated and coordinated protocol. The following terms will be used:
 - Immediate Protective Action Plan (IPAP) - Actions taken to immediately control any significant and clearly observable condition that is present and is endangering or threatening to endanger a child.
 - Corrective Action Plan (CAP) - Steps, actions, or strategies taken to correct or address behaviors or conditions associated with an individual employee related to abuse/neglect or areas of concern.
 - Facility Action Step (FAS) - All actions, steps, or strategies taken to correct or address areas of concern identified within the broader agency's culture, services, or contract compliance.
 - Facility Services Plan (FSP) - "Rolling" document specific to each facility which allows for the identification of issues impacting child safety within the broader agency's culture, hiring, training, supervision, services, or contract compliance. The FSP is made up of all CAPs and FASs.
 - Notice To Comply (NTC) - Formal written notice to a facility indicating a CAP or FAS was not completed within agreed upon timeframes resulting in a Written Plan of Compliance being implemented.
 - Written Plan of Compliance (WPC) - Formal accountability process, which if not adhered to within 30 calendar days, results in adverse contract actions that include vendor holds and possible contract termination.
- Align OCA and SPPU policies to improve and clearly delineate notification processes and staff responsibilities related to IPAP, CAP, FAS, FSP, NTC, and WPC by 11/1/15. (Date of completion is a result of state rule-making restrictions and time frames that will not allow more expeditious policy changes) Prior to policy completion: OCA and SPPU staff will practice in accordance with this activity during all involvement related to the top ten agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/15/15.
- Use one FSP per facility as a "rolling" document, monitored by the same individual within DHS, to which new incidents are added, allowing for review and corrective actions related to facility culture, hiring, training, and supervision issues. A draft document will be in use for testing purposes, no later than 10/1/15. (Due date is a result of implementation being contingent upon changes occurring in KIDS, DHS will continually monitor to expedite if possible) Prior to development of the electronic document in KIDS: SPPU staff will create manual versions of this document for the top ten agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/1/15.
- SPPU Facility liaison creates and monitors the CAP; if the CAP is not completed within established time frames, DHS will immediately document and implement a formal accountability process which may include vendor holds, reduction of reimbursements, and contract termination. A detailed outline of this process will be available by 9/1/15 and will be implemented system wide with all group homes, by 11/1/15. Prior to system wide implementation: SPPU staff will practice in accordance with this activity for all CAPs established involving the top ten agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/1/15.

Core Strategy #6: Maltreatment in Care- Facilities Part 2

Strategy 2:

Modify group home contracts system wide to specify appropriate behavioral supports.

Activities:

- Require by 11/1/15 as a matter of contract and ongoing DHS oversight that all group homes use appropriate positive youth development behavior management techniques, as determined by subject matter experts, strictly limiting restraints to a narrow and clearly documented set of circumstances, and only by trained staff. Prior to contract change: SPPU staff will coordinate and monitor completion of training in appropriate positive youth development behavior management techniques for the top ten agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015. Scheduling and coordination of these trainings will begin 9/15/15.
- Each SPPU facility liaison will become a certified trainer by 12/1/15 for behavior management to better support critical thinking regarding appropriate behavioral supports. Prior to all liaisons being trained, SPPU staff on the heightened monitoring team will become certified trainers by 9/1/15.
- A timeline and detailed process for implementing this strategy will be proposed to the Co-Neutrals for approval by 8/1/15.

Strategy 3:

By 11/1/15, DHS will develop and implement specific plans detailing heightened monitoring and oversight of the ten agencies with the highest number of substantiations of child abuse and neglect during the previous quarter. DHS will, on at least a monthly basis, assess the efficacy of the plans, and adjust appropriately in order to reduce risk of abuse and neglect.

Activities:

- By 8/1/15, engage Oklahoma Health Care Authority (OHCA) as a partner in reducing maltreatment by targeting those hospital setting providers that fall within the top ten agency list.
- Commence quarterly meetings with OHCA, SPPU, Office of Client Advocacy, and Child Care Licensing by 10/15/15, specifically to review information related to compliance, quality of care, and abuse/neglect referrals in institutional settings with a specific review of the top ten agency list.
- By 11/1/15, begin quarterly team audits of the top five providers with the highest number of substantiated findings that were discussed at the most recent quarterly meeting. If audit indicates additional steps or strategies must be taken to correct or address findings of the audit these will be added to the facilities FSP and will include accelerated times for completion.
- If these added steps or strategies are not completed timely, the formal accountability (WPC) process will be instituted, which includes vendor holds, reduction of reimbursements, and possible contract termination.

Interim Process Prior to Implementation:

- *SPPU will convene a heightened response and monitoring team comprised of the SPPU administrator and five SPPU facility liaisons to work solely with those agencies identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/1/15.*
- *Agency Referral and Substantiation data will be analyzed to create the top ten agency lists by 8/15/15. This has been completed previously, but more recent data will be analyzed to inform the ongoing efforts. Data identifying all areas of concern, substantiated findings, and CAPs from May through July, 2015 for each agency on the top ten list will be compiled.*
- *Initial heightened monitoring meeting between NRCYS, OHCA, Office of Client Advocacy, Child Care Licensing, and SPPU to review the top ten agency list and coordinate joint response for each agency will occur by 9/1/15.*
- *Bi-weekly heightened monitoring meetings to track progress on efforts will begin by 9/15/15.*

Core Strategy #6: Maltreatment in Care- Facilities Part 3

Strategy 4:

By 10/15/15 implement the use of a standardized interview guide when meeting with youth at each facility to assess child safety within the institutional context. Prior to Implementation: SPPU heightened response and monitoring staff will utilize a standardized draft document when meeting with youth at all facilities identified as having the highest number of referrals and substantiated reports of child abuse and neglect from May through July, 2015, by 9/1/15.

Activities:

- Analyze other states' work and tools for examples of interview guides currently being utilized, review and revise to meet DHS needs in obtaining information most proximal to abuse and neglect in congregate care.
- Review and revise, if necessary, the current interview tool used by SPPU Contract Performance Team in combination with examples obtained from other states by 9/15/15.
- Train SPPU liaisons by 10/1/15 and PP staff by 11/1/15 to effectively use the interview tool.

Strategy 5:

By 12/1/15, implement use of provider "report cards" to reflect performance in keeping children safe from abuse and neglect. (Change in implementation dates as these "report cards" are a reflection of how all agencies are performing with regard to the aforementioned strategies) Prior to full implementation: Bi-weekly heightened monitoring meetings beginning 9/1/15 will include regular review of abuse and neglect incidents involving all facilities on the top ten agency list.

Activities:

- Review "report card" templates and decide on most appropriate and informative one by 10/15/15.
- Develop implementation plan for use of "report card" by 11/1/15.

Core Strategy #6: Maltreatment in Care- Foster Care		
<p>Strategy 1:</p> <p>Review and update CWS policy and Instructions to Staff (ITS) by 8/31/15, for completing background checks and history review of kinship and traditional foster families during the initial approval and ongoing reassessment process.</p>	<p>Strategy 2:</p> <p>Review and update CW policy and ITS by 9/30/15, regarding investigations and policy violations in family-like settings to include on-going review of additional referrals regardless of whether screened out, unsubstantiated, etc.</p>	<p>Strategy 3:</p> <p>Review and update CWS policy and ITS by 9/30/15, regarding requests to overfill foster homes in family-like settings.</p>
<p>Activities:</p> <ul style="list-style-type: none"> • Policy changes will be submitted under CW emergency rule with a numbered memo to staff implementing new process by 8/31/15. • Develop centralized process for reviewing all background information to include review of criminal, Department of Public Safety, Web-based checks, and CW history. Process will be piloted in one region of the state beginning 9/30/15 with full implementation by 12/1/15. 	<p>Activities:</p> <ul style="list-style-type: none"> • By 9/30/15 DHS will develop a process for a joint review by the PP worker and supervisor and the foster care or foster care partner agency worker and supervisor of all CW history when a referral is received, whether screened out or accepted on a current foster home. This review will include identification and implementation of a plan to provide additional supports and or development of a written plan of compliance with the family. This plan will be implemented statewide by 10/31/15. • By 9/30/15 DHS will Update ITS regarding a communication plan that includes all child welfare workers and supervisors assigned to children placed in the foster home and the foster care or foster care partner agency worker and supervisor for development, implementation, review and recommendations regarding completion of the written plan of compliance. • By 9/30/15 DHS will develop a process to remind the child's worker and supervisor and the foster care or foster care partner agency worker and supervisor regarding review dates when a WPC is initiated with a foster family. • By 10/30/15 DHS with TA from Annie E. Casey consultants will begin implementation of training of foster care and foster care partner agency staff regarding development of written plans of compliance. 	<p>Activities:</p> <ul style="list-style-type: none"> • Policy changes will be submitted under CW emergency rule with a numbered memo to staff implementing new process by 9/30/15. • Require each overfill request to include identification of possible services or supports needed by the child, family, or both, for a safe and stable placement, reviewed and documented monthly during worker visits when the foster family provides care for more than 5 children in DHS custody or more than 6 children total. • Strengthen the overfill process to require more oversight including, but not limited to <ul style="list-style-type: none"> ○ increased current requirements and criteria regarding approval for overfilling of foster homes to include review and approval by the Deputy Director of foster care and the Deputy Director of the child's worker when a family will be caring for 8 children or more; ○ foster care or foster care partner agency worker contacts all children's workers prior to quarterly visit with foster families to address any additional needs; • Review and update current policy and ITS on the difficulty of care eligibility requirements to ensure adequate financial support is in place for families caring for children with high needs by 9/30/15. • Review and update monthly contact guide in KIDS to include results of an assessment of the child's safety during the monthly contact with the child. The change requires staff to document that the child has been interviewed separately from placement provider with a narrative discussing issues related to safety. This updated contact guide will include results of enhanced safety assessment of children who are medically fragile. Changes are set to occur in KIDS in December 2015. In the interim, a memo to staff outlining expectations for worker visits and assessment of safety will be issued to staff by 8/15/15. • Develop a corrective action plan to address deficiencies identified in the CQI review of the Hotline by 11/1/15.

Core Strategy #7: Placement Stability Improvement

<p>Strategy 1:</p> <p>Expand and embed placement stability processes in Region 4 through Mobile Crisis Stabilization efforts and New Placement Protocols/Processes.</p>	<p>Strategy 2:</p> <p>Introduce placement stability processes in Regions 4 and districts 2, 5, 7, and 13 through Comprehensive Home Based Services (CHBS) by 9/1/15.</p>	<p>Strategy 3:</p> <p>Sustain long-term statewide placement stability.</p>
<p>Activities:</p> <ul style="list-style-type: none"> • Implement and embed Mobile Stabilization Team (through OK Department of Mental Health and Substance Abuse Services Systems of Care) placement disruption protocol throughout Region 4 by 9/1/15. • Train district directors, supervisors, and CW specialists on mandatory placement disruption process and protocol for Region 4 by 9/1/15. • Train project directors, care coordinators, and licensed mental health professionals on the mandatory placement disruption process and protocol for Region 4 by 9/15. • Develop feedback loop for district directors and SOC project directors regarding all possible placement disruptions, including methods of reporting placements disruptions on a regular basis by 9/1/15. • Explore care coordination streamlined through CHBS maintain placement by 1/1/16. • Analyze placement disruption reports from the district director, SOC project director, and KIDS to ensure the process and protocol is effective, as well as using the Pinnacle Plan Measures 4.2 and 4.2a. 	<p>Activities:</p> <ul style="list-style-type: none"> • Introduce placement disruption protocol into targeted districts. • Train district directors, supervisors, and CW specialists on mandatory placement disruption process and protocol for the identified districts. • Train CHBS providers on mandatory placement disruption process and protocol for the identified districts. • Develop feedback loop for district directors, CHBS providers regarding all possible placement disruptions, including methods of reporting placement disruptions on a regular basis. • Analyze placement disruption reports, from the district director, CHBS provider, and KIDS to ensure the process and protocol is effective, as well as using the Pinnacle Plan Measures 4.2 and 4.2a. 	<p>Activities:</p> <ul style="list-style-type: none"> • Strategize ways, through a national conference opportunity in 9/15, to maximize funding to ensure children in out-of-home care have two or fewer placements by 1/16. • Analyze placement disruption data related to Kinship, CW Foster Homes, and Supported Foster Homes to determine the highest level of support and resources needs to increase placement stability. • Develop a statewide replication strategy to roll out placement stability processes to other Regions/districts by 9/1/15. • Create and develop a foster care placement line to assess children and resource needs to ensure right placements for children entering and in out-of-home care by 1/16. • All new placements for children in out-of-home care have a 30 day review of stabilization and continued 90 day follow ups specific to supports and resource needed by children and placement providers to increase placement stability by 1/16. • Create and develop a statewide Mobile Stabilization Team and care coordination by maximizing current resources by 1/16.

Appendix D : Criteria for Counting New Non-Kin Foster and TFC Homes SFY16

Foster Homes (Non-Therapeutic, Non-Kin)

Definition: non-therapeutic, non-kin foster homes include traditional and supported foster homes only.

Count

1. A home certified for the first time as a foster home. This includes homes certified at the same time to be both an adoptive and foster home.
2. A home reopened or recertified as a foster home as long as the home has been closed as a foster home for more than twelve months.
3. A home newly certified as a foster home if the home is already approved as an adoptive home.
4. A home certified as a kinship home that is then reassessed and/or certified as a traditional foster home resource open for non-kinship placements.

DHS must be able to identify these converted or dually certified homes in its reporting if the home existed as a kinship home within the last 12 months.

In order to count any home that is converted from either a kinship or adoptive home to a traditional or supported foster home, DHS also must certify that DHS staff has completed and documented a thorough conversion process with the foster family and that the family has accepted the placement of a child in DHS custody. This same certification must be completed to count any new homes designated as poor prognosis homes.

Do Not Count

1. Any home or family already open or certified as a foster home.
2. Any home certified as a foster home open to kinship placements only.
3. Any certified foster home closed within the previous twelve months.
4. Any home designated as a respite-only home.
5. Any home approved as a contracted foster home.

Therapeutic Foster Care (TFC) Homes

Count

1. A home certified for the first time as a therapeutic foster care home and does not already exist as a certified traditional foster home.

Do Not Count

1. Any certified TFC home that closed in the previous twelve months.
2. Any newly certified TFC that already exists as a certified traditional foster home.
3. Any TFC approved as a respite-only TFC home.

Appendix E : Co-Neutral Foster Parent Phone Survey

To: Ed Lake and Jami Ledoux

From: Kevin Ryan, Kathleen Noonan and Eileen Crummy

Date: August 25, 2015

Re: Co-Neutral Foster Parent Phone Survey

The Co-Neutrals' team conducted a phone survey of foster parents who had a placement in their home for the six-month period of January 2015-June 2015. The intent of the phone survey was to do a qualitative review of caseworkers' monthly contacts by speaking with 150 foster parents who participated in the monthly contacts. DHS has historically performed well on caseworkers completing the required monthly contact with the children and families assigned to them. Through the survey, the Co-Neutrals sought to understand the content discussed by workers during the monthly contacts, the level of foster parent satisfaction with the quality of contacts, and the average length of contacts.

Below is a summary of the findings of the phone survey.

Methodology

Survey

The Co-Neutrals developed an eight question survey to conduct over the phone with foster parents selected to participate. Foster parents were instructed to answer the survey questions in regards to their current or most recent permanency caseworker who completed contacts in their home over the last six months. In some cases when a foster parent had more than one caseworker, more than one survey was completed. The Co-Neutrals crafted survey questions regarding the frequency by which caseworkers discussed with foster parents the supports and services they may need for themselves and their foster children. These questions aimed to understand if monthly contacts were advancing foster children's well-being and foster parents' capacity to care for the child placed with them and, thereby, encourage placement stability. The survey questions also looked at how monthly contacts are used to advance a child's permanency plan, the length of monthly contacts, and foster parents' overall level of satisfaction with monthly contacts. The last survey question was open-ended and gave foster parents the opportunity to share any information they would like about their experience as a foster parent. The Co-Neutrals shared a draft of the survey with DHS, and incorporated DHS' feedback on the survey questions before use. Listed below are the survey questions. For questions 1 through 5, respondents were given the following answer choices: Always, Frequently, Sometimes, Rarely and Never. The final survey is attached.

Q1. How often does the child's caseworker spend time during the monthly visit to discuss what services or supports the child needs to advance their well-being?

Q2. How often does the child's caseworker spend time during the monthly visit to discuss what services or supports you (the foster parent) need to best care for your foster child?

Q3. How often does the child's caseworker increase contacts with you in times of change or stress in order to support your continuing to care for the child in your home (avoid disruption)?

Q4. How often does the child's caseworker spend time during the monthly visit to discuss and advance the child's permanency plan?

Q5. How often are you satisfied with the overall quality of the monthly visit with your foster child's caseworker?

Q6. How long on average do the monthly visits last?

Q7. Do you and your child's caseworker have any other regular communication, beyond monthly visits, to address service needs?

Q8: Is there anything you'd like to share about your experience as a foster parent?

Foster Home Sample

In composing the sample pool of foster homes, the Co-Neutrals used a random stratified sample to capture key characteristics. First, the sample was stratified by region to account for differences in region size. The number of foster homes to be selected from each region was determined by the number of caseworkers in each region. Second, in order to account for differences in caseload compliance across the state, each district was assigned a caseload compliance level – low, medium, and high.⁴² The goal of the stratified sample was to obtain equal representation among the three caseload levels: 50 homes served by permanency workers in areas with the lowest caseloads based on the criteria, 50 homes in areas with medium caseloads, and 50 homes in areas with the highest caseloads. Third, the type of foster home (traditional, supported, TFC, kinship relative, or kinship non-relative) included in the survey was proportional to the total population of open resource homes in each district selected based on the other criteria.

In order to secure 150 phone connections and completed surveys, the Co-Neutrals selected a random sample of 321 foster homes based on the above stratified sample criteria that had been open and had a placement from January 2015-June 2015. The Co-Neutrals' drew a sample pool of 321 homes with the anticipation of a 50 percent success rate of survey completion. Twenty-one calls were made to test the survey. The pilot survey calls supported the anticipated 50 percent successful completion rate. The final sample list of 321 homes was shared with DHS, and DHS notified each foster home of the Co-Neutrals' survey, and encouraged their participation.

⁴² The methodology for assigning districts low, medium or high caseload compliance was determined by the percent of caseworkers in each district that met the caseload standard on May 28, 2015. Districts that were assigned low caseloads had between 100 and 48 percent of their caseworkers meeting the caseload standard. Districts that were assigned medium had between 47 and 36 percent of their caseworkers meeting the caseload standard, and districts that were assigned high caseloads had 35 percent or less of caseworkers meeting the standard. The designations of low, medium and high caseloads are relative to caseload levels across the state, and do not necessarily reflect any standard definition of low, medium or high caseload levels.

The Co-Neutrals’ team called a total of 321 sample homes and completed a total of 193 surveys. To maintain the stratified sample criteria, only 150 surveys are calculated in the survey findings.⁴³

Table 1: Completed Survey Composition

Region	District	Resource Type					Total	Caseload Level
		Traditional	Traditional – Supported	Kinship Relative	Kinship Non-relative	TFC		
1	2	2	1	3	2	0	8	Low
1	4	3	3	6	2	1	15	Medium
2	21	3	1	7	3	1	15	High
2	23	4	2	6	2	1	15	High
3	7	6	8	12	5	4	35	Low
4	22	5	3	8	3	1	20	High
4	24	3	1	6	2	1	13	Medium
5	12	1	2	3	1	0	7	Low
5	14	4	3	10	2	3	22	Medium
TOTAL		31	24	61	22	12	150	

Summary Findings of the Survey:

Overall, the findings show that the majority of foster parents perceive the quality of their monthly visits with their foster child’s caseworker as positive. For questions 1 through 5, the answers choices run along the spectrum of “Always” to “Never.”

⁴³ Based on the higher success of call backs from some areas, homes in those areas were overrepresented in the total completed surveys (193) and were not included in the survey assessment to maintain the integrity and intended representation of the stratified sample.

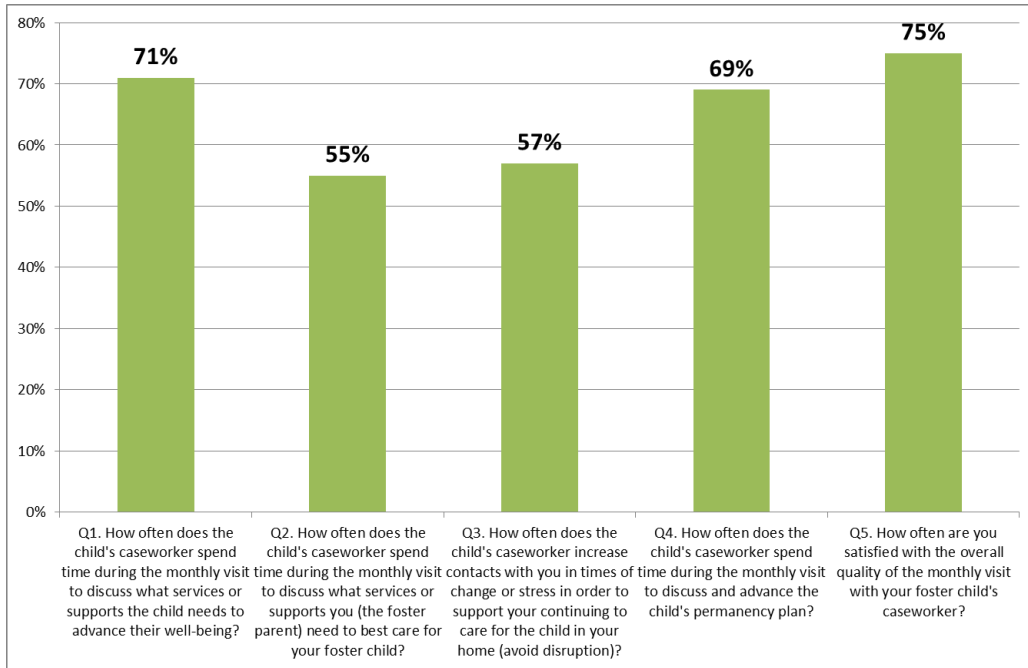
Table 2: Findings of Phone Survey Questions 1-5

Answer Choices	Q1. How often does the child's caseworker spend time during the monthly visit to discuss what services or supports the child needs to advance their well-being?		Q2. How often does the child's caseworker spend time during the monthly visit to discuss what services or supports you (the foster parent) need to best care for your foster child?		Q3. How often does the child's caseworker increase contacts with you in times of change or stress in order to support your continuing to care for the child in your home (avoid disruption)?		Q4. How often does the child's caseworker spend time during the monthly visit to discuss and advance the child's permanency plan?		Q5. How often are you satisfied with the overall quality of the monthly visit with your foster child's caseworker?	
	#	%	#	%	#	%	#	%	#	%
Always	79	53%	58	39%	66	44%	76	51%	86	57%
Frequently	27	18%	24	16%	20	13%	27	18%	26	17%
Sometimes	23	15%	23	15%	15	10%	20	13%	20	13%
Rarely	12	8%	24	16%	17	11%	18	12%	10	7%
Never	8	5%	18	12%	21	14%	9	6%	8	5%
N/A	1	1%	3	2%	11	7%	0	0%	0	0%
TOTAL	150	100%	150	100%	150	100%	150	100%	150	100%

Due to rounding, percentages may not add up to 100%.

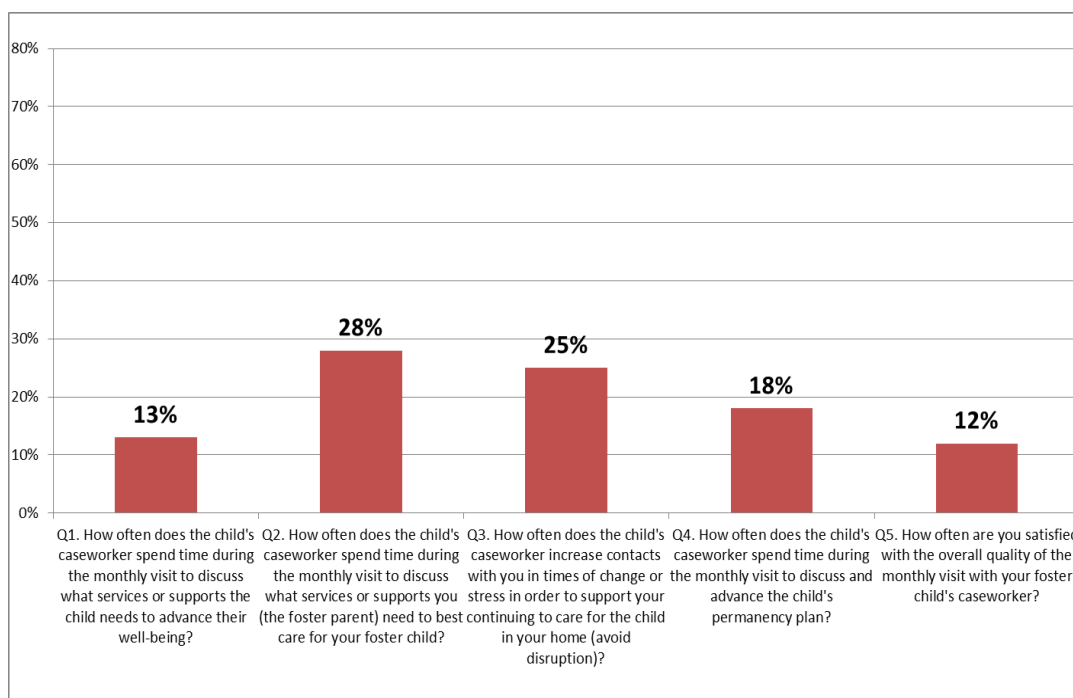
Tables 3 and 4 collapse the answers choices presented in Table 2 into two categories: positive (reflecting answer choices of always and frequently selected by foster parents, indicating a positive experience) and negative (reflecting answer choices of rarely and never selected by foster parents, indicated a negative experience). The answer choices of “Sometimes” and “N/A” selected by foster parents were removed from the analysis presented in Tables 3 and 4 in order to best capture positive and negative ratings. Table 3 shows that foster parents rated their caseworkers the majority of the time in the positive category for these questions.

Table 3: Positive Ratings for Questions 1 through 5



Conversely, foster parents rated their caseworkers' monthly contacts as negative in questions 1 through 5 the minority of the time, as Table 4 below demonstrates. While 75 percent of foster parents were satisfied with the overall quality of monthly contacts (question 5), only 12 percent reported being dissatisfied.

Table 4: Negative Ratings for Questions 1 through 5



Tables 5 and 6 below show the findings for survey questions 6 and 7. Question 6 is concerned with the average length of caseworkers' monthly contacts. The survey found that the most common length of contact is one hour (32 percent) and 87 percent of visits are 30 minutes or longer. Acknowledging that foster parents may interact with their caseworkers outside their monthly contacts to receive support and services, question 7 was included in the survey at DHS' suggestion. As Table 6 presents, the majority of foster parents (77 percent) have regular communication with their caseworkers beyond the monthly contact.

Table 5: Findings of Question 6

Answer Choices	Q6. How long on average do the monthly visits last?	
	#	%
15 minutes	19	13%
30 minutes	43	29%
45 minutes	30	20%
One hour	48	32%
More than one hour	10	7%
TOTAL	150	100%

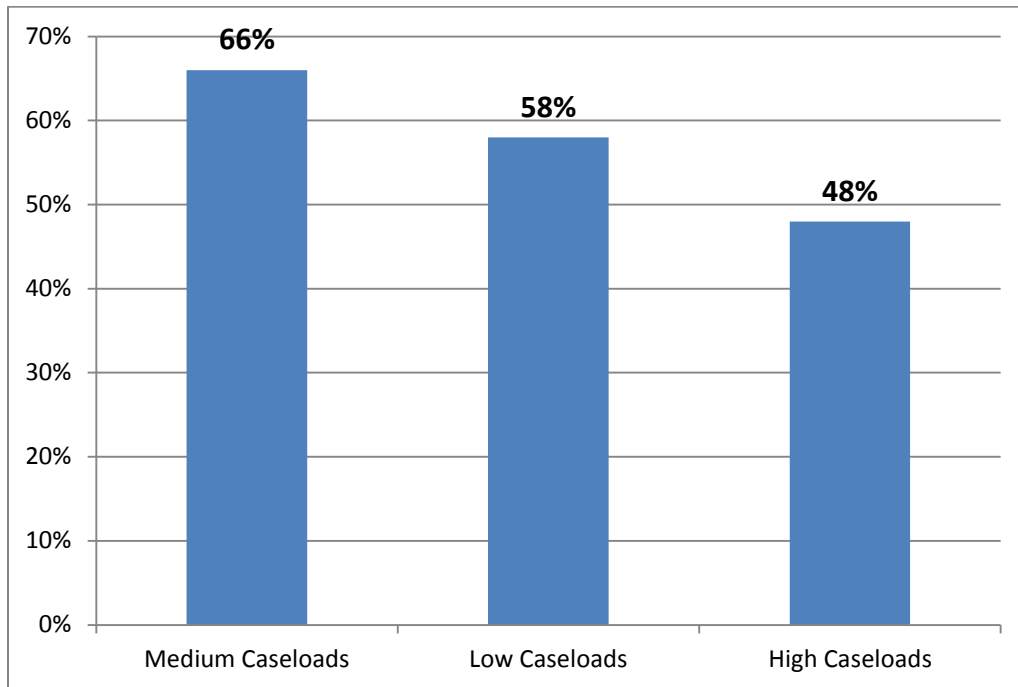
Table 6: Findings of Question 7

Answer Choices	Q7. Do you and your child's caseworker have any other regular communication, beyond monthly visits, to address service needs?	
	#	%
Yes	116	77%
No	32	21%
Other	2	1%
TOTAL	150	100%

Survey Results by Caseloads Level

Foster parents served by permanency caseworkers from districts with medium caseloads report the highest level of satisfaction, with 66 percent of foster parents rating that they are always satisfied with the quality of the monthly contact, compared with 58 percent from districts with low caseloads and 48 percent from districts with high caseloads.

Table 7: Foster Parents Always Satisfied with the Quality of Monthly Contacts by Caseload Level (Question 5)



The survey data shows that foster parents served by permanency caseworkers from districts with high caseloads report lower levels of satisfaction on every survey question compared to foster parents served by permanency caseworkers from districts with low and medium caseloads.

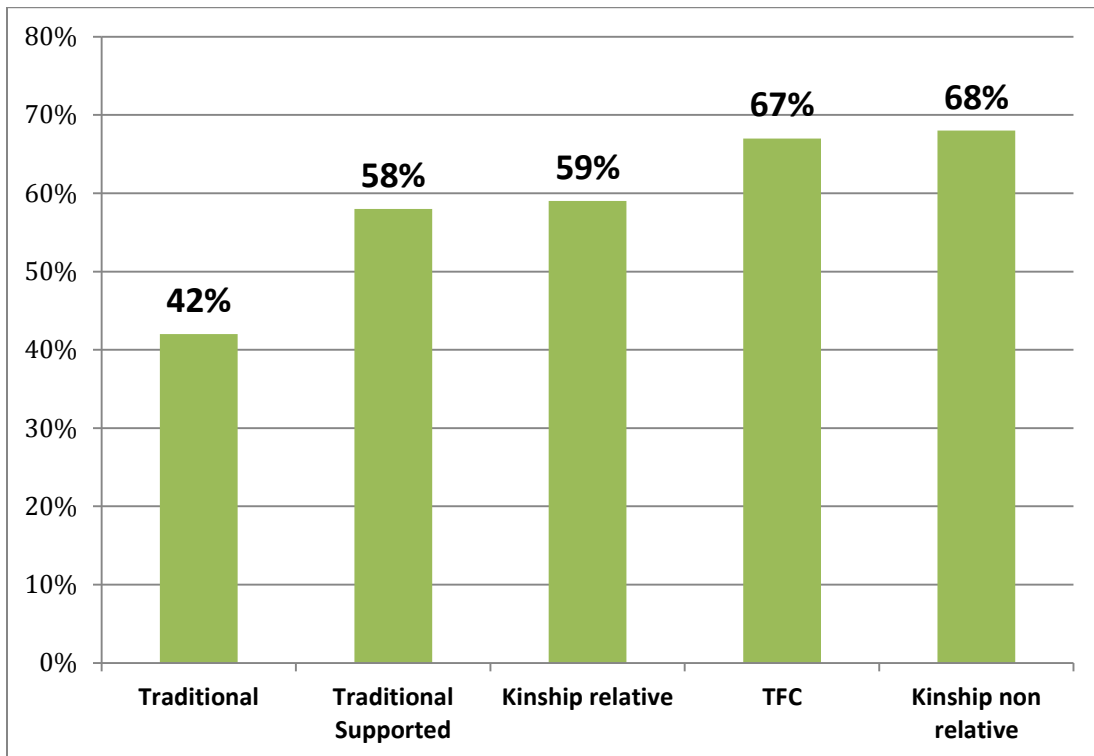
An additional finding showed that foster parents served by caseworkers in high caseload districts report that less than half the time their caseworkers always accomplish the tasks described in questions 1 through 5 of the survey, unlike the foster parents with caseworkers that carry low and medium caseloads.

The length of the monthly contact varies by caseload level with foster parents served in low caseload districts reporting the longest monthly contacts, with 92 percent of contacts lasting 30 minutes or more, compared to 88 percent in medium caseload districts and 82 percent in high caseload district. See attachment 1 for summary data of caseloads level.

Survey Results by Resource Type

The survey found some variation between foster parents of different resource types in their reported level of satisfaction with caseworkers' monthly contacts. Overall, kinship non-relative homes reported the highest level of satisfaction, while traditional homes reported the lowest level of satisfaction. As Table 8 shows, kinship non-relative foster parents have the highest rating of foster parents always being satisfied with the quality of the monthly contact (68 percent), followed by the TFC (67 percent) and kinship relative (59 percent) homes, and traditional supported (58 percent) and traditional (42 percent) homes showing the lowest rates.

Table 8: Foster Parents Always Satisfied with the Quality of Monthly Contacts by Resource Type (Question 5)



For all resource types except traditional homes, there was a consistent pattern of foster parents rating their overall satisfaction of monthly contacts (question 5) higher than their individual ratings for every other question (1 through 4) that addressed the more specific content of the visits. This discrepancy may reflect that foster parents' satisfaction with their caseworkers' monthly contacts is determined by factors not covered in this survey.

Foster Parent Comments

The last question included in the survey allowed foster parents to share any information they would like about their experience as a foster parent. Not all foster parents chose to respond to the question. In total, there are 141 surveys that include responses to the open-ended question.⁴⁴

The review of the 141 foster parents' comments revealed the wide range of experiences held by foster parents. In their comments, some foster parents highlighted the excellent work of their caseworkers in supporting them and their foster children. Foster parents also commented on the rewarding role of being a foster parent. In some cases, foster parents provided both positive and negative comments, some of which went beyond the work of caseworkers or perhaps even DHS. For example, some foster parents expressed that while their current caseworker is outstanding, previous caseworkers have been less satisfactory, or that their concerns about their child's case are not the result of caseworkers failing to perform their jobs well but instead due to systematic problems within DHS or outside of DHS, such as the courts. Foster parents also identified the high turnover of caseworkers as a problem, particularly highlighting the challenge of having to bring new caseworkers up to date on their foster child's case. Some foster parents commented on their frustration that foster children are in the system too long as a result of biological parents being given too many opportunities for reunification. Some of the negative comments also highlighted the need for improved communication and more respect for foster parents. Overall, foster parents expressed appreciation for the challenging work of caseworkers, particularly those with high caseloads.

Foster Parents with Multiple Caseworkers

The survey includes 10 foster parents that completed more than one survey due to having multiple caseworkers at the time of the survey. The review of these surveys showed that some foster parents perceived the quality of their multiple caseworkers' monthly contacts differently. For example with a clear distinction, one foster parent surveyed had three caseworkers. The foster parent reported being always satisfied with one of the caseworkers' monthly contacts, while rarely satisfied with the other two caseworkers.

Safety Question

The survey questions focus mostly on how caseworkers' monthly contacts are used to support foster parents and children's well-being. The survey does not include questions that address how monthly contacts are used to ensure foster children's safety while placed in a foster home. The Co-Neutrals' and DHS had already found through their individual MIC reviews that in some cases monthly contacts were not being effectively used by caseworkers to ensure a foster child's safety. In response to both the Co-

⁴⁴ The Co-Neutrals incorporated all 193 completed surveys in their review of survey comments.

Neutrals' and DHS' MIC reviews, DHS has committed in its Phase II Core Strategies to update the contact guide used by caseworkers during monthly contacts to include a component pertaining to safety.

Glossary 1: Acronyms

ATAT	Adoption Timeliness Accountability Team
CPS	Child Protective Services
CSA	Compromise and Settlement Agreement
CWS⁴⁵	Child Welfare Specialist
CQI	Department of Human Services Continuous Quality Improvement
DHS	Oklahoma Department of Human Services
FFY	Federal Fiscal Year
LD	Laura Dester Shelter (state-operated)
MIC	Maltreatment in Care
MST	Mobile Stabilization Team
NCANDS	National Child Abuse and Neglect Data System
OAYS	Oklahoma Association of Youth Services
ODMHSA	Oklahoma Department of Mental Health and Substance Abuse
OCA	Department of Human Services Office of Client Advocacy
PEM	Pauline E. Mayer Shelter (state-operated)
PRT	Permanency Roundtable
RFP	Request for Proposals
RFP	Resource Family Placement
SFY	State Fiscal Year
TFC	Therapeutic foster care
YSA	Youth Services Agency

⁴⁵ CWS additionally is the acronym for Child Welfare Services – the agency within DHS that is charged with improving the safety, permanence and well-being of children and families involved in the Child Welfare system.