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# CHAPTER 2

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## CPS supervisors do not consistently assign incidents to tracks

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### Chapter Summary

**File and Incident Review**

**Methodology** To review DFS' multiple response system effectiveness and track assignments, we selected a random sample of 137 files (referencing individual families) almost evenly divided between investigation files (68) and non-investigation files (69). We focused our review primarily on incidents opened between January 2004 and December 2007, although some files contained earlier and later incidents. This resulted in our analyzing hundreds of incidents from all CPS tracks. We examined both electronic records in WYCAPS and hard copy files stored at the local offices.

Track assignment is a critical step in the CPS process because by definition, it determines the intensity and extent of DFS' involvement in families' lives. By following our file and incident review methodology (summarized in the box to the left), we found that despite clear statutory and DFS policy language, CPS supervisors are assigning incidents inconsistently or not at all to the three tracks. This has resulted in a lack of a true case management framework for caseworkers to follow when working cases through to closure. Further, since statute requires DFS to accept and track incidents within 24 hours of a report, many track decisions may be made hastily without needed information. We recommend that all accepted CA/N reports be assigned to a track, as envisioned by statute, and that track assignment decisions be more closely linked to casework practices.

### Statutes authorize a two-track, multiple response system

In 2005, the Legislature authorized in statute what had been DFS practice through rules since 2001: a multiple response approach, whereby caseworkers respond to reports of known or suspected CA/N by investigating or assessing them. Statutory criteria define the conditions for assigning a report as an investigation: when allegations indicate that criminal charges could be filed, children appear to be imminent danger and it is likely they will need to be removed from the home, or a child fatality, major injury, or sexual abuse has occurred. Statute requires local offices to assign reports that do not meet investigation criteria to the assessment track.

### **DFS developed a third level of response**

Consistent with W.S. 14-3-203(a)(iii), DFS developed a third track, prevention services, through rules and policy. It is a means of encouraging prevention efforts such as making resource referrals for treatment. Rules define preventive services as appropriate for a report with no allegations of abuse or neglect, but with identified risk factors that might indicate the need for services. Designed also as a low-level service response for clients requesting assistance, the prevention track intends to decrease the likelihood of a family's subsequent DFS involvement through the higher-level tracks.

### ***The investigation, assessment, and prevention tracks describe different response levels in CPS incidents.***

This hierarchy of three tracks reflects the variety of CPS incidents caseworkers handle, and implies graduated degrees of caseworker labor and time involvement for them. Investigation track incidents often use more resources and involve many required activities, while assessment and prevention track incidents have fewer prescribed casework practices and documentation requirements.

We conducted a survey of DFS supervisors, who uniformly responded they believe the assessment and prevention tracks free caseworkers to do "actual social work." However, there was no consensus among them that these tracks were effective in either minimizing further CPS involvement, or satisfactorily addressing the problems presented in CA/N reports.

### **Supervisors are responsible for assigning incidents to tracks**

### ***Track assignment occurs early in the CPS intervention.***

Track assignment occurs early in the casework process: statute, rules and policy call for this decision within 24 hours of DFS receipt of a CA/N report. CPS supervisors make the track assignments based upon intake information; some reported they always consulted with caseworkers at this point, while others said they rarely did. By policy, supervisors can change tracks on opened incidents, either up to investigation or down to assessment, depending upon what caseworkers find with respect to investigation track criteria. From reviewing incident narratives and intakes, we saw that some supervisors specifically explain their track assignment reasoning, but many do not.

***Some supervisors consider a family's CPS history; others do not.***

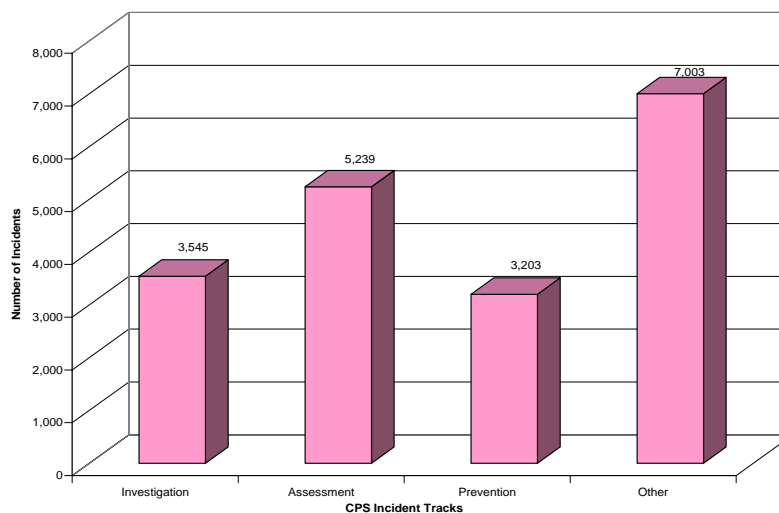
In survey responses, supervisors were unanimous in agreeing they rely upon policy and rules when making track assignments. They were less uniform in their responses as to whether a family's history with DFS, or its inclination to be cooperative, also affected the assignment. Some considered family history integral, while others based decisions strictly on whether the current allegations met the policy and rule criteria for the different tracks.

**Supervisors do not assign tracks in more than one-third of CPS incidents**

In the period we reviewed, CY 2004 – 2007, DFS processed approximately 19,000 incidents, mostly accepted reports of CA/N (see Figure 2.1, track assignments for accepted CPS incidents). Of that total, we found that 7,003 incidents (37 percent) listed no track assignment in WYCAPS. This report refers to these undefined incidents as “other,” a category usually reserved for outliers rather than a proportion as large as this (see Appendix D for more track data).

Figure 2.1

**Track assignments for accepted incidents  
CY '04 – '07**



Source: LSO analysis of DFS-WYCAPS data

***It did not appear that “other” incidents were default investigations.***

CPS policy instructs supervisors to assign CA/N reports as investigations when they are in doubt about which track to assign. However, we could not assume that in practice, supervisors had assigned these “other” incidents, by default, as investigations. In our review of hard copy files, we saw evidence that supervisors intended some of these “other” incidents to be worked as assessments, and some as “verifications” (not an alternative response defined in policy or rules).

### **Missing track assignments interfere with DFS’ case management framework**

CPS supervisors and caseworkers regularly handle these “other” incidents in the course of their work, and close them without identifying them by tracks. While this practice impedes evaluation of the track system, the more serious implication is that it interferes with the framework for consistent casework that policies for the various tracks provide.

***A lack of clarity in track assignment can lead to inappropriate approaches to clients.***

Regardless of track, statutes envision that DFS will respond appropriately to all CA/N reports, and ideally WYCAPS documentation of track assignments can support DFS managers in their duty to oversee caseworkers’ responses. “Other” incidents, those not in a track, may not get an appropriate response. Without an investigation assignment, a caseworker may not approach a severe incident with law enforcement, as policy directs. On the other hand, if the benefit of the lower tracks is the flexibility to engage families in voluntarily accepting assistance, unclear direction from a missing track assignment may result in a caseworker applying a legalistic response that is not warranted.

### **Assessment and prevention tracks are not clearly differentiated as alternate responses**

In general, we did not see a separate, graduated response system at work with these two tracks, as is envisioned in statute and DFS policy. DFS policy distinguishes prevention from assessment track incidents in that prevention track incidents do not have allegations associated with them. However, in our sample review, none of the incidents in the two tracks (0/32 assessment, and 0/19

prevention) showed formal allegations in the pertinent WYCAPS screens. According to policy, allegations are necessary in assessment incidents since they guide service provision.

***Track designations are poorly documented...***

Also, we saw intake reports which assigned incidents to the prevention track even though they contained formal allegation terms such as medical neglect or physical abuse. According to policy, these incidents should have been at least assessments, if not investigations. We saw little documentation of the decision-making process that went into assigning an incident to the prevention rather than the assessment track, or vice versa. From the information we had, we were also unable to identify similarities among incidents that made them more likely to be assigned to one track than the other.

***...and used for multiple purposes.***

Further, DFS uses the prevention track for the administrative purpose of managing subsidized adoption and guardianship payments. Here, the child has reached permanency, but the incident is held open in WYCAPS as prevention to allow for monthly payments to the adoptive parent or guardian receiving the subsidy until the child reaches 18 years of age. Mixing these incidents with active social service incidents diffuses the purpose of the prevention track and hampers analysis of its effectiveness.

**Track assignment decisions occur quickly, sometimes before relevant data is gathered**

***Supervisors have only intake reports upon which to base track assignments.***

Statute sets a 24-hour deadline for CPS supervisors to accept a report and assign a track. An intake report is often the only evidence available to the supervisor in that period; unless it is a report requiring immediate response, the caseworker has more time (one week) to establish contact with clients, complete a safety assessment, make an initial home visit, and compile client information and other evidence that preliminarily confirms or refutes the allegations. Supervisors often assign incidents to tracks in the absence of this information.

***Track assignments should be made after***

Other circumstances can complicate the supervisor's decision as well. For example, the intake may come from a report biased by ongoing custody disagreements between former spouses or other relatives. Because we saw so many varieties of this in our sample

***gathering relevant information.***

review, we concluded that an intake report may be sufficient to trigger DFS intervention, but it often does not give supervisors enough information on which to base track determinations.

Aggregate data show the closure reason for nearly 26 percent of the “other” incidents as “unfounded,” and we saw supervisors delay making the track assignment until the family either cooperated or refused services. This suggests supervisors often do not know how to track an incident until caseworkers gather more information.

**Wide variations in track assignment statistics indicate inconsistency among field offices**

Aggregate track assignment statistics show that offices assign incidents in significantly different ways. We found that from office to office, the rates at which incidents are assigned to tracks varied widely (see Appendix D). For instance, in the Rawlins office only 3 percent of the incidents from 2002-2007 were assigned to the prevention track; in Kemmerer it was 27 percent. In the Torrington and Cody offices, assessment incidents amounted to over 40 percent of the workload, whereas the Cheyenne and Riverton supervisors assigned less than 10 percent of incidents to the assessment track.

***Inconsistency in application may lead to inequity of treatment.***

While the child welfare issues presented by populations in the different communities might vary, it is difficult to understand how they could be so different as to result in these wide-ranging track assignment rates. Community differences such as population size or economic conditions do not equate to observable trends in this data. From this analysis and our examination of track assignment decisions through the file review, we infer that there is inconsistency in decision-making, even though surveyed supervisors said policy guided them in track assignments.

## **Recommendation: DFS should seek statutory change to allow supervisors more time before assigning tracks.**

***For the track system to accomplish its potential, it needs to be used consistently.***

Track assignment decisions properly reflect the state's graduated response to presenting CA/N problems. The multiple response track system can support effective casework practice, but to accomplish its potential, it needs to be used consistently and purposefully. We know state-level DFS officials often hear from the field that the paperwork involved in CPS is overwhelming, and that it detracts from the time available for casework with families. Nevertheless, track assignment and allegation recording are integral to the state's recently-implemented efforts to improve child welfare services through the track system.

***For many incidents, to assign a track a supervisor needs more information than is in the initial report.***

DFS needs to ensure that CPS supervisors are documenting all track assignment decisions. Then, track assignments will better link to case management if supervisors can delay the decision until after an initial information-gathering period. Undoubtedly some incidents are clear enough at intake that there is no question about track assignment; this is particularly true for investigation incidents where imminent danger to a child appears to exist, or when law enforcement already has taken protective custody.

However, for those incidents that do not present such clearly-drawn lines, supervisors need a broader knowledge base for making tracking decisions than the intake report may contain. Within a week, the supervisor should have results of the safety assessment, initial interviews, collateral contacts, and caseworker observations in hand.

