

Child and Family Services Reviews OSRI Quality Assurance Guide

Purpose

This quality assurance (QA) guide is recommended for use by reviewers and those conducting all levels of QA to ensure that Onsite Review Instrument and Instructions (OSRI or instrument) data are accurate, complete, and consistent. It contains information regarding general and item-specific issues to consider when reviewing a case or conducting QA on an OSRI. The guide also describes an approach to conducting QA that encourages discussions with reviewers before completion of the OSRI in addition to a final QA review of the instrument once it is completed.

Beginning the QA Discussion

Once reviewers have started their review of a case record and case-related interviews, and have completed the Face Sheet of the instrument, QA staff should meet with them to discuss the case before they begin to work on the OSRI item ratings. The purpose of this discussion is to allow QA staff to get a basic understanding of what is happening in the case and ensure that reviewers (1) are taking the right approach to rating the case based on the case circumstances and correctly recording the practice observed in the proper location within the instrument, (2) understand the key practice concerns that will need to be analyzed within the OSRI, and (3) have had the opportunity to obtain any needed clarification on the rating process/criteria and applicability of items in the OSRI. There may be instances where reviewers will need assistance on how to reconcile inconsistencies in information gathered from interviews and case documentation, and this should also be discussed during this initial QA conversation.

Obtaining relevant background and contextual information for a case is a critical step in providing QA. Begin the discussion by reviewing the Face Sheet and discussing the following with the reviewers:

What type of case is it?

- In-Home Services (IHS) (make sure no child/youth in the family was in foster care for more than 24 hours during the period under review (PUR) and discuss how to assess IHS cases with trial home visits [THVs])
- Differential/Alternative Response (DR/AR) (make sure the state has this program and that the case is accurately identified as DR/AR)
- Foster Care (FC) (check to see if it is a short-term FC case; such cases have unique rating instructions throughout the OSRI)

Case Status

- Is the case currently open or closed? How long was the case open? Was the case open multiple times during the PUR?

- Why is the agency involved with the family? Ask reviewers to describe the risk and safety concerns that existed during the PUR.

Case Participants—Children

- For IHS and FC cases, which children were in the family home during the PUR? Note ages of children. Were there specific children in the home who were the focus of services?
- For FC cases, note the target child's age and ask whether any siblings are in foster care. Note the length of time the child has been in foster care and ask reviewers what the child's current permanency goal(s) is/are.
- Review the Child Table in the Face Sheet (Table G1) to ensure all children in the family, as identified in the case file, are captured.
- Siblings are children who have one or more parents in common either biologically, through adoption, or through the marriage of their parents.

Case Participants—Identifying Parents/Caregivers

- Review the Case Participant Table in the Face Sheet and identify the parents/caregivers who will be rated in the case, considering that these terms are designed to be inclusive of the various familial and fictive kin circumstances encountered in child welfare cases.
- Biological and legal parents should be included in the table—regardless of their involvement with the child/ren at the time of the review, even if their identity is unknown (e.g., Jane or John Doe), they are deceased, or their parental rights have been terminated—to ensure that a parent is not inappropriately left out of consideration in the review. If biological parents are not listed, reviewers should explain why. Ensure that reviewers have considered all appropriate case participants, including same-sex parents, significant others, and members of intergenerational households, as applicable.
- Based on case circumstances, significant others who have contact with children should be considered in the provision of safety-related services (Item 2), and assessments of risk and safety (Item 3). Significant others typically should be assessed in the context of their relationship with the primary caregiver(s) who will be caring for the children. For example, if the biological mother is the caregiver with whom the child(ren) will be reunified, and her boyfriend needs services to ensure he can appropriately care for the child(ren) because he lives in the home, the agency may need to assess and provide services to him, but that would be captured under “Mother” in Sub-Item 12B because it affects the assessment of her protective capacity in caring for her children. If he does not comply with services, that could necessitate a change in assessment and service provision to the mother.
- Foster parents who become adoptive parents or legal guardians during the PUR are rated in 12C until the adoption or guardianship is finalized. If the case is kept open for services post-finalization or is opened again during the PUR, they should be rated in 12B as adoptive parents or guardians for that portion of the PUR.
- If the whereabouts of a parent are unknown, discuss whether concerted efforts to locate the parent were made and how this will affect ratings across the OSRI.
- Review the definitions of parents for Items 8 and 11, and for Items 12, 13, and 15, with reviewers to ensure that they will capture the right caregivers in each item based on the case circumstances.

Period Under Review

- Ensure reviewers have assessed all agency services and actions on all accepted maltreatment reports and open cases, regardless of which county or office was responsible for the case at the time of the review, from the start of the PUR up to the date that the case is reviewed, or closed, whichever comes first. Discuss any work, such as conducting safety and risk assessments, linking families to services, and coordinating safety planning, that the agency did during an investigation or differential response assessment before actually opening the case for services. Similarly, if multiple cases were opened for services during the PUR, ensure that reviewers considered all of those cases for assessment in the OSRI.
- Tribal services or actions on cases prior to state agency involvement are not subject to review unless or until the state agency has some level of case management responsibility via an open case or pursuant to a Tribal/state agreement. Similarly, Tribal service provision is not subject to review after the state agency has closed its case unless the same conditions exist.
- Ensure that the date of case closure entered in the Face Sheet reflects the date on which the agency has completed all case closure activities required by the state's policy. Keep in mind that this might not be the date the case was closed in the state's information system.
- Discuss with reviewers the total time that the case was opened for services during the PUR; any delays in case transfer, service provision, legal processes/proceedings, etc.; and the impact of those delays on outcomes for the family.
- The CFSR reviews only for services and activities up to the age of 18, so ensure the Face Sheet reflects the date the child turns 18 as the discharge date unless the state continues to provide services to the youth after his or her 18th birthday and the case remains open, or the case is closed after the youth turns 18. In those circumstances, reviewers should reflect that date as the date of closure, or use Not Applicable rather than the 18th birthday if the case is not closed at the time of review.

Once you have a general overview of the case, discuss whether the reviewers have adequate information from the case record and case-related interviews to rate the case or whether additional interviews may be necessary. Discuss any conflicts reviewers may have noticed in the information gathered. Move into a discussion with the reviewers that begins broadly at the outcome level but also allows reviewers to explain strengths/concerns as they relate to particular items. QA staff should ask appropriate follow-up questions that will help prompt the reviewers to consider whether the case achieved the practice standards that are presented in the OSRI. The following questions can be used to guide the initial QA discussion:

Safety Questions—What strong case practice was in place related to safety and what were key practice concerns?

- Did the agency appropriately assess and address risk and safety issues throughout the PUR and at critical case junctures? (Make sure reviewers are correctly differentiating between risk and safety issues.)
- What were the key risk and safety issues during the PUR? Did the agency provide and/or arrange for services to prevent entry or re-entry into foster care?
- If safety concerns were present, did the agency (1) provide or arrange for appropriate services and/or (2) engage in appropriate safety planning (e.g., developing, monitoring, updating the safety plan) as needed?
- Were children maintained in their homes whenever possible/appropriate?

Permanency Questions—What strong case practice was in place related to permanency and what were key practice concerns?

- Will permanency be achieved timely based on the length of time the child has been in foster care?
- How did the agency work with the courts in moving the case forward toward permanency?
- Did the child have permanency and stability in his/her living situation?
- Were the child's family relationships and connections preserved?

Well-Being Questions—What strong case practice was in place related to well-being and what were key practice concerns?

- Did the agency adequately engage the family, conduct comprehensive assessments, and provide needed services to meet the family's identified needs?
- For FC cases: Were the child's educational, physical, and mental health needs adequately assessed and addressed?
- For IHS cases: discuss which children will be assessed in Items 12, 13, and 14 and discuss which items (16–18) may be applicable based on case dynamics. Discuss whether any applicable needs were assessed and addressed.
- How did the agency work with other system partners to ensure the family's needs were assessed and addressed and attempt to mitigate any barriers?
- How did the frequency and quality of caseworker visits support effective family engagement; risk, safety, and needs assessment; and service provision?

General QA Issues

Once you have discussed the case and any unique case dynamics with the reviewers in the initial QA discussion, reviewers should then complete the item ratings in the OSRI. Reviewers should conduct their own review of the completed instrument before submitting it for final QA review.

Some of the general issues to review for once the case has been submitted for QA include:

- Ensure that documentation in item questions provides appropriate rationale for “No” responses. If not, discuss with reviewers to determine whether the rationale can be strengthened, or if they should reconsider their response to the question.
- Ensure that any item rated Not Applicable has adequate rationale to support that rating (be sure to inspect items that do not have any non-applicability criteria checked yet are rated Not Applicable).
- Ensure that the right case participants (e.g., children and parents) are assessed in appropriate items.
- When assessing multiple case participants in the Mother or Father role (e.g., one mother and two fathers—a biological father and a stepfather), ensure reviewers answered the questions about the “Mother” using the mother in the case, and answered questions about the “Father” using both the biological father and the stepfather. If reviewers answer Yes for one father but No for the other, the answer to the relevant question would be No.

- Ensure that the Item Rating Rationale Statements (1) adequately and appropriately support the ratings using case-specific details; (2) address all rating-related questions; and (3) reflect balanced consideration of information gathered from the case record and collected from case-related interviews. (For additional support, refer reviewers to the Round 4 Guide for Writing “No” Narratives and Rationale Statements, available on the CFSR Information Portal.)

Face Sheet and Item-Specific QA Questions

Depending on the level of detail reviewers were able to provide in the initial QA discussion, QA staff may not need to ask reviewers all of the questions below. These questions are provided as a guide to (1) ensure that reviewers accurately rated the case based on the instructions outlined in the OSRI, (2) help QA staff understand the rationale behind reviewer responses, and (3) sufficiently justify the item ratings.

Face Sheet

- Confirm that the Relationship to Child column is completed in accordance with the OSRI instructions for each case participant, including whether the parent served as a caregiver and/or whether the parent lived in the same home with the child(ren).
- As applicable, ensure that the reviewers accurately entered the dates of the first case opening of the cases open for services during the PUR, the child’s latest removal, the child’s most recent entry into foster care, the child’s physical return from foster care placement, and the child’s discharge from foster care.
- For cases subject to the CFSR pursuant to a title IVE agreement between the state agency and a Tribe, confirm that question L was answered accurately based on the federal definition of “entry into foster care” and not the IV-E eligibility determination date.
- For cases with a child in Tribal custody or in which the state is consulting with the child’s Tribe, confirm that the date the state court discharged the child from foster care, rather than the Tribal court’s date, is entered in question N.

Item 1: Timeliness of Initiating Investigations of Reports of Child Maltreatment

- Confirm with reviewers that they included all reports received during the PUR, including any reports that came in after the case was closed (if applicable), ensuring that only accepted reports that relate to the target child in foster care or the children in the target child’s family as identified in the case file are included, and not reports regarding other children in a foster family home or placement.
- Ensure that reviewers have included any maltreatment reports involving the target child’s siblings if the target child remains in foster care, regardless of an intervening termination of parental rights (TPR).
- Review the policies on state-specific priority response timeframes to ensure accuracy.
- Confirm that reviewers did not count each allegation or child as a separate report when tallying the number of reports for questions A, B, and C, but instead considered the date of the report as a distinct report made to the agency.

Item 2: Services to Family to Protect Child(ren) in the Home and Prevent Removal or Re-Entry Into Foster Care

- Carefully review the item applicability criteria that reviewers selected and their rationale, ensuring that the decision was not based solely on the results of a risk and/or safety assessment tool. For

foster care cases, ensure that all foster care entries and all reunifications during the PUR were considered when responding to the criteria.

- If the case is applicable, ask the reviewers to describe the case-specific child safety and/or risk concerns.
- If question A is answered Yes, ask the reviewers to describe which services were provided to the family, and the alternative caregiver, if applicable, and when, to ensure that the identified services are clearly linked to case-specific circumstances related to the prevention of foster care entry/re-entry and/or supporting reunification. Also, ensure that reviewers assessed agency efforts to engage the family in the identified services when considering whether the agency facilitated a family's access to appropriate services.
- Services that were offered to the family that were not aimed at preventing foster care entry or re-entry after reunification, and/or supporting a safety plan, should be captured in Item 12B.
- For cases involving a THV, confirm that reviewers answered question A based on whether concerted efforts were made to provide or arrange for appropriate services to protect the child in the home during the THV. Also, if a child returned to a foster home placement (from the THV), ensure reviewers consider that as a "removal" from the home for purposes of Item 2.
- If question B is answered Yes, ask the reviewers to explain the circumstances that warranted immediate removal.
- For additional support, see "Reviewer Brief: Application of CFSR OSRI, Item 2: Services to Family to Protect Child(ren) in the Home and Prevent Removal or Re-Entry Into Foster Care," available on the portal.

Item 3: Risk and Safety Assessment and Management

- For foster care cases, if the child entered foster care during the PUR but reviewers selected Not Applicable for Item 2, ask the reviewers about the circumstances of the removal to determine if any concerns should be noted in Item 3.
- Ensure that reviewers considered any children remaining in the family home, as reflected in Table G1, regardless of an intervening TPR, until the target child exits foster care.
- Ensure that reviewers assessed only the risk/safety assessments that were associated with the opening of the case in question A. Assessments connected to maltreatment reports received during the PUR, but after case opening, should be considered in question B.
- If question B is rated Not Applicable, ask the reviewers to explain their rationale and ensure that it is consistent with the instructions provided.
- Discuss the quality of the risk/safety assessments that the agency conducted, both formal and informal. Ensure that the frequency and quality of worker visits with the child(ren) and/or parents (in Items 14 and 15) was adequate to appropriately assess risk and safety throughout the PUR. Ask the reviewers what contributed to the quality, or lack thereof, of the assessments (e.g., use of collateral contacts, including all household members, reassessing at critical case junctures) to support their answers to questions A and/or B.
- If any of the concerns in A1 are checked Yes, and reviewers answered A or B Yes, ask the reviewers to explain their rationale.

- If question C is answered Yes, ask reviewers to describe the safety concerns present in the home, the safety plan intended to control the active threats to the child(ren)'s safety, and how it was monitored and adjusted, if needed. Ensure that reviewers are considering plans that contain the elements of a safety plan but may not be called a safety plan (see OSRI definition of "safety plan").
- If question D is answered Yes, ask the reviewer to describe the recurring maltreatment or other safety incident(s) that occurred with the child's family, typically in the family home.
- If question C and/or D is rated Not Applicable and the question is applicable for assessment, ask the reviewers how they determined that there were no apparent safety concerns during the PUR.
- Ensure that reviewers are only considering safety concerns when responding to questions C through F and are not considering risk issues in those questions.

Item 4: Stability of Foster Care Placement

- Ensure that the reviewers have considered all time periods that the child was in care during the PUR. If you notice that the placement dates do not account for all time periods, ask reviewers if the child was in a placement that is not considered a "placement setting" during those periods.
- Discuss all the "reasons for change in placement" with reviewers to determine whether question B is answered appropriately. Ensure that any moves up to higher levels of care because of increased mental or behavioral health needs, or moves made to ensure safety, have been evaluated carefully.
- If a child's placement was disrupted during the PUR or is/was not stable, reviewers should assess whether the agency provided any services, such as training or respite arrangements, to the foster parent/caregiver to stabilize or support the placement. While these efforts should be captured in Sub-Item 12C, ensure that reviewers consider in this item the attempts, or lack thereof, to stabilize the placement before moving the child to a different or a more restrictive placement setting.
- If any of the child or youth's placements are in a short-term placement where their needs are assessed, ensure that questions 4C1 and 4C are answered appropriately given the inherently temporary nature of this type of placement.

Item 5: Permanency Goal for Child

- Review the table to determine whether question B is answered accurately. Ensure that reviewers completed the table and question A3 by noting dates on which goals were *established*, not achieved. The case plan goal does not need to be court-ordered for it to be considered "established" for CFSR purposes. If the case plan goal is identified in the child's case plan or described in an administrative review or case plan meeting, reviewers can consider this as the date on which the goal was established.
- For cases with children in Tribal custody or for whom the state agency is collaborating with the child's Tribe to pursue a customary adoption, ensure that reviewers accurately identified adoption as the permanency goal despite the absence of TPR.
- Ensure that the 60-day requirement for establishing a case plan does not include a child's time in a facility that is outside the scope of foster care (e.g., detention) because the child is not considered to be "in foster care" due to the nature of the placement facility.
- Discuss the response to question C and ensure that reviewers considered the child's age and needs, and the circumstances of the case (e.g., length of time in foster care, status of caregivers in resolving safety concerns) as well as the use of default goals without consideration of case

circumstances, or goals selected primarily due to agency factors (e.g., lack of resources, process delays). In cases in which the appropriateness of the goal(s) is based on a child's/youth's "age of consent" for adoption, did reviewers assess the agency's efforts to work with the child around these issues (e.g., the level of work done with the child to determine whether the child really does not want to be adopted)?

- Ensure that reviewers also considered whether single and concurrent goal changes were made timely and appropriately when answering questions B and C.
- Ensure that reviewers accurately calculated the child's time in foster care in question D (see Item 5 Reviewer Brief).
- If question E is answered Yes, ask reviewers which Adoption and Safe Families Act (ASFA) TPR criteria the child met.
- If question F is answered Yes, ensure that it is answered consistent with the question F instructions and question D. Reviewers should only assess the timeliness of the TPR filing if it was due during the PUR. If a TPR was filed prior to the PUR, the answer to 5F is Yes.
- If any exception in question G1 is checked, discuss the specifics with reviewers to confirm accuracy. Placement information in Item 4 should be reviewed to assess whether the child was placed with relatives at the 15/22-months timeframe. Compelling reasons need to be applied to a child only once and, other than being cared for by a relative, must be documented in the case file to count as an exception.
- For cases with children in Tribal custody or for whom the state agency is collaborating with the child's Tribe, ensure, as applicable and appropriate, that any cultural opposition to TPR by the Tribe is reflected in question G1 as a compelling reason not to pursue TPR.

Item 6: Achieving Reunification, Guardianship, Adoption, or Another Planned Permanent Living Arrangement

- If concurrent goals were in place, ensure that reviewers responded to questions B and C appropriately.
- Ensure that reviewers have considered only current (or most recent) permanency goal(s) even if the current permanency goal(s) was established shortly before the end of the PUR.
- If Question B is answered Yes but the child has been in foster care for more than the suggested timeframe (12, 18, or 24 months, depending on the goal) and the goal has not yet been achieved, ask reviewers to describe the circumstances to ensure that the delay is justified (see examples in instructions).
- Ensure that reviewers consider the role of THVs when assessing concerted efforts to achieve reunification, even though a THV does not equate to reunification. Reunification occurs when the child is legally discharged from foster care and the agency no longer has placement and care responsibility.
- If question B is answered Yes and the child has not been in foster care for more than the suggested timeframe but has not yet been discharged from foster care, ask reviewers when the goal is projected to be achieved to ensure that it meets the recommended timeframes in the instructions. Also ask reviewers to describe the concerted efforts of both the agency and the court that have been made to ensure timely achievement of the goal.

- If question B is answered No and the child has not been in foster care for more than the suggested timeframe (e.g., abandoned infant), explore with reviewers why the identified permanency goal could have been achieved sooner to ensure that assessment is reasonable given the case circumstances. Consider whether the barriers noted are significant enough to consider the item an area needing improvement. Otherwise, question B should be answered Yes if permanency was achieved for the target child within the suggested timeframe.
- If question C is answered Yes but question C2 is answered No Date, ask reviewers why they believe the child's living arrangement can be considered permanent. Discuss the evidence that exists of formal steps the agency and court took to make the arrangement permanent. Such steps might include the agency asking foster parents or relatives to agree to and sign a long-term care commitment or ensuring that a child who is in a long-term care facility to meet special needs will be transferred to an adult facility at the appropriate time.
- Ensure that reviewers answered questions 6B, 6C, and 6C2 based on the efforts the agency and court made to achieve the current permanency goal(s) during the PUR prior to the youth turning 18, even if the youth turned 18 during the PUR.
- If a child has a concurrent goal of Another Planned Permanent Living Arrangement (APPLA) and the child is already placed in a living arrangement that can be considered permanent, ensure that question 6C is answered Yes because the goal of APPLA has already been "achieved."

Item 7: Placement With Siblings

- Ask reviewers to describe the placement arrangements of siblings placed separately. If question B is answered Yes, what were the reasons for separate placement? If a valid reason existed, was the separation reassessed by the agency over time during the PUR?
- For the purposes of this item, ensure that only siblings as defined in the item instructions are included in the item assessment. Issues related to preserving connections between children who grew up in the same household but are not related biologically or through adoption and/or marriage should be addressed in Item 9.

Item 8: Visiting With Parents and Siblings in Foster Care

- Ensure that case participants selected as Mother and Father are accurate based on instructions, the goal of the item (the child's previous relationships with parents/caregivers are preserved in a way that supports the achievement of permanency with those parents/caregivers), and case circumstances. Discuss the factors the reviewers considered when determining whether each parent had an applicable relationship with the child, including the frequency and quality of contact, as well as the child's perception of the parent and their relationship.
- Ask reviewers to identify the parents who are considered a potential reunification resource and had an established relationship with the child before the child's entry into foster care, even if they were not the primary caregivers for the child at the time of removal. Also discuss the timing of reunification plans during the PUR and how that affects which parents/caregivers are included in the assessment.
- For questions E and F, ensure that reviewers considered any sibling (as defined under "Case Participants—Children," above) in foster care with whom the target child had a connection prior to entering foster care regardless of whether the target child lived with the sibling before the target child's foster care placement, or would be expected to live with the sibling if the target child was not in foster care.

- Discuss the reasons any case participants, including siblings, are determined Not Applicable for assessment to ensure accurate application of the applicability criteria.
- If visitation frequency for A1, B1, and E1 are anything less than “more than once per week,” and the related question (i.e., A, B, or E) is answered Yes, discuss with reviewers how the frequency was sufficient for the child and whether efforts for more frequent visits were made. Ensure that visitation was in person unless such contact was not possible.
- Ask reviewers to describe the visitation arrangement (e.g., location, length, supervision) when discussing their responses to questions C, D, and F.

Item 9: Preserving Connections

- Ask the reviewers to describe the child’s connections and how they were/were not maintained.
- If reviewers considered the concerted efforts made by persons other than the agency, discuss whether that is the most appropriate expectation (e.g., the caseworker did not follow through on the child’s request, so someone else stepped in to help facilitate the connection).
- Ensure that the item was not rated on connections the child formed after entering foster care. This includes establishing new relationships with siblings, which should be captured in Sub-Item 12A. The focus of this item is on maintaining connections the child had at the time the child entered care.
- If, prior to removal, the child had contact and a relationship with biological parents who are not the caregivers from whom the child was removed and with whom the agency is working toward reunification, ask whether those relationships should be preserved and were addressed in this item.
- If the child was not maintained in the same school setting, ask for the reasons and how that decision was made.
- Ensure that the reviewers explored whether or not the child had a connection with a Tribe based on possible or confirmed Tribal affiliation or cultural self-identification by the family. If a connection existed prior to entering foster care, discuss with the reviewers how this connection was maintained during the PUR.

Item 10: Relative Placement

- Ensure that reviewers are considering only individuals who meet the federal definition of “relative,” including those individuals, for example, who were married but have since divorced, or who are adoptive parents or blood relatives of a half-sibling. Adoptive parents via customary or Tribal adoptions are considered relatives for the purposes of this item once the adoption is finalized.
- If B and/or C are answered Yes, ask the reviewers to describe the quality of efforts that were made throughout the PUR and at critical points in the case.
- If B and/or C are answered Not Applicable, ask about the rationale to ensure that it is consistent with the instructions even if the child was placed in a pre-adoptive home and the adoption was finalized or the agency was not able to identify, locate, inform, and evaluate paternal relatives because the agency did not make efforts to locate a putative father (which would lead to question C being answered No).

Item 11: Relationship of Child in Care With Parents

- Ensure that the case participants selected as Mother and Father are accurate based on instructions and case circumstances. The same participants should be selected in Items 8 and 11.
- See Item 8 of this QA Guide for additional guidance.

Item 12: Needs and Services of Child, Parents, and Foster Parents

Sub-Item 12A: Needs Assessment and Services to Children

- For foster care cases, ensure that 12A is answered only for the target child. The needs of the target child's siblings can be considered in 12B by assessing the needs of the parent(s) to care for those children and what services the agency provided to assist them.
- If one or more children in an in-home services case is not included in the assessment of 12A, discuss the circumstances the reviewers considered (e.g., the reason for the agency's involvement with the family, the goals of the case, the impact of any risk and safety concerns present during the PUR). For example, if the agency was involved with the family because a parent was requesting mental health services for one of his or her children, and the other children in the home were not subject to any maltreatment concerns and did not require the same mental health services, it may be appropriate to focus only on the child receiving the services because that was the reason for the agency's involvement with the family and there were no other risk/safety concerns for the other children. Similarly, for cases in which the agency became involved with the family due to a child experiencing juvenile delinquency issues, if the other children in the home were not subject to any maltreatment concerns and there are no risk and safety issues present during the PUR that affect the other children, it may be appropriate to focus only on the child for whom the delinquency issues are being addressed in the assessment of Item 12. If the delinquency issues are affecting the safety of the other children in the home, and safety-related services are necessary, those would be captured in Item 3, not in Item 12.
- Ask about how needs were assessed. Did the worker visit with the child(ren) frequently enough to allow for ongoing assessment? Did the worker ask about the child(ren)'s needs with the child(ren)'s caregivers and/or foster parents? Ensure that reviewers answered question A1 based on the comprehensiveness and accuracy of the assessment(s), both formal and informal. Discuss with reviewers whether the agency's informal assessments included a review of any formal assessments completed and collateral contacts, and a substantive understanding of the child(ren)'s needs.
- Also ask reviewers to explain what the child(ren)'s needs were during the PUR. Were all of these needs accurately assessed by the agency? Consider the circumstances of the case, age(s) of the child(ren), etc., as you discuss needs. Discuss any needs the child(ren) may have had related to kin; new Tribal connections; establishing familial relationships not present prior to the target child's entry into foster care, including with siblings; and social skills. For a child establishing a Tribal connection, consider participation in Tribal activities, supporting attendance in language classes or other types of education to build the connection to the Tribe and indigenous knowledge, coordinating with a Tribe, including Tribal courts when available and appropriate, and working with the Tribe to integrate traditional teachings/culture/beliefs in case planning and service delivery.
- Ask the reviewers to describe the services that the child(ren) received during the PUR. Discuss whether the services addressed all of the child(ren)'s needs. Ensure that the reviewers considered whether the services provided were tailored to the specific needs of the child(ren), culturally appropriate, accessible, responsive, and monitored and adjusted, as needed, to ensure progress.

- Ensure that assessment and services related to education, physical health, and mental health (including substance use issues and exposure to domestic violence) were not considered for this item.
- For foster care cases, if the target child is an adolescent, ensure that independent living services were addressed.
- For in-home services cases, if the child(ren) is living or placed with an alternative caregiver outside of his or her home but is not considered to be in foster care, ensure that the agency's assessment considered the child's need for permanency and stability.
- When children are being cared for by an alternative caregiver, ensure that the caregiver has had needs adequately assessed and addressed that are related to the ability to meet the identified needs of the children living with the caregiver.
- For more information and case examples, see "Reviewer Brief—Strengthening How Reviewers Determine Effectiveness of Agencies' Assessment of Underlying Needs and Provision of Services (OSRI Item 12)."

Sub-Item 12B: Needs and Services of Parents

- Ensure that the right case participants were selected as Mother and Father based on instructions and case circumstances. For in-home services cases, ensure that reviewers considered the following case dynamics when determining whether to include an uninvolved parent in the assessment of this sub-item: (1) the length of time the case was open; (2) the type and severity of the concerns with the family (e.g., ongoing safety issues or high-risk concerns) and the level of risk of foster care entry; (3) the reason for and extent of the agency's involvement; (4) any legal/permanent arrangement with relatives/legal custodians and goals of the case; (5) court involvement or non-voluntary cases; (6) the extent to which the involved parent is successfully addressing the concerns; (7) the level of contact the non-custodial parent has with the child(ren); and (8) the desire of the noncustodial parent to be involved as a resource for the child(ren). In situations where a custodial parent refuses to allow the agency to contact a non-custodial parent, ensure the reviewers included the non-custodial parent in their assessment of 12B only if the court ordered their involvement, if the children were at risk for foster placement, or if the children have ongoing contact with the non-custodial parent that necessitates an assessment of that parent. Also note that if the above circumstances exist but the custodial parent expresses serious concerns about the non-custodial parent, such as a history of abuse, neglect, domestic violence, or substance use issues, this should be taken into consideration and assessed accordingly.
- For foster care cases where the target child was removed from a relative and the plan is to reunify with that relative, Items 12, 13, and 15 should consider the relative as well as the birth parents. Regardless of the child's legal relationship with the relative, it is important for the agency to review the assessment and services provided to that relative, the involvement of the relative in case planning, and worker contacts with the relative to ensure that the child can achieve a safe and successful reunification.
- Ensure that foster parents who became adoptive parents or legal guardians during the PUR are rated in 12C until the adoption or guardianship was finalized. If the case is kept open for services post-finalization or is opened again during the PUR, confirm that reviewers rated them in 12B as adoptive parents or guardians for that portion of the PUR.
- Ensure that the same participants were rated in Items 12B, 13, and 15, as appropriate based on case circumstances.

- In Well-Being Outcome 1, concerns about efforts to identify or locate a parent should only be reflected in Item 12. If the identity and/or whereabouts of a parent were unknown during the PUR and the agency did **not** make concerted efforts to identify and/or locate them, the applicable item questions for that parent should be answered No, resulting in an Area Needing Improvement rating for Sub-Item 12B as well as Item 12. This parent should **not** be assessed in Items 13 and 15. Questions for that parent in those items should be answered NA. However, ensure that a parent who is incarcerated—and will be for a long time—has not been determined to be Not Applicable for the relevant Well-Being items without considering the agency's responsibility to reach out to that parent to ask about their desire to be involved, and to assess the appropriateness and level of their involvement.
- If the child came into foster care before the PUR, the agency made concerted efforts to identify/locate an alleged father before the PUR, and there were no case circumstances during the PUR that would warrant further efforts (e.g., if additional information about the father's identity or location was discovered), questions related to the father in Items 12, 13, and 15 would be answered Not Applicable.
- Ask reviewers how needs were assessed: Did the worker visit with the parent frequently enough to allow for ongoing assessment? Were collaterals consulted? Were underlying needs explored? Ensure that reviewers answered question B1 based on the comprehensiveness and accuracy of the assessment(s), both formal and informal.
- Also ask reviewers to explain what the mother's and father's needs were during the PUR. Were all of these needs accurately assessed by the agency? Consider the circumstances of the case, reason for the agency's involvement, length of time case has been open, case plan progress, etc., as you discuss the parents' needs.
- Ensure that significant others have been appropriately assessed in this item, as applicable. Significant others typically should not be included in the definition of "Mother" or "Father" but instead should be considered through their relationship with the primary caregiver(s) who will be caring for the children. For example, if the biological mother is the caregiver with whom the child(ren) will be reunified and her boyfriend needs services to ensure that the child(ren) are safe with him because he has access to them, the agency should assess and work with him, but that would be captured under "Mother" in Item 12 because it affects the assessment of her protective capacity. If he does not comply with services, that could necessitate a change in assessment and service provision to the mother.
- For foster care cases, if biological parents did not have an established relationship with the child prior to removal, the agency should assess whether developing a relationship with the biological parents would be in the child's best interests and determine whether anything should be done to support that goal. Services in support of such needs (e.g., providing for visits, phone contact, arranging for therapy) should also be captured in this item.
- Ask the reviewers to describe the services that the mother and the father received during the PUR. Discuss whether and how these services addressed all of their needs and whether the services enhanced the parents' ability to provide appropriate care and supervision of their child(ren) and ensure their safety and well-being. Were there any barriers to accessing services? If so, how did the agency assess and attempt to address them? Were services matched to each parent's specific needs? Were they culturally appropriate, accessible, responsive, and monitored and adjusted, as needed, to ensure progress?
- For more information and case examples, see "Reviewer Brief—Strengthening How Reviewers Determine Effectiveness of Agencies' Assessment of Underlying Needs and Provision of Services (OSRI Item 12)."

Sub-Item 12C: Needs and Services of Foster Parents

- If there are multiple foster parents during the PUR, ensure that reviewers included all of them in the assessment of the item.
- In some cases, foster parents may be a potential permanent placement for the child and, if so, their needs related to permanency achievement should also be assessed in this item.
- Ask reviewers to describe how the foster parents' needs were assessed. Were there any concerns about their ability to care for the child that were not assessed and addressed? (Refer to Item 4 to assess the child's stability in the placement).
- Ask reviewers to describe any services that the foster parents received during the PUR. Did the services provided meet the identified needs?

Item 13: Child and Family Involvement in Case Planning

- If reviewers answered Yes to A, B, or C, ask them to describe how the agency actively involved each person in case planning.
- If reviewers have indicated that a parent is not applicable because Item 12B is rated as an Area Needing Improvement due to a lack of concerted efforts to identify or find applicable parents, ensure that this determination is appropriate based on case circumstances. If it is, the questions related to that parent in Item 13 should be answered Not Applicable.
- If the child came into foster care before the PUR, the agency made concerted efforts to identify/locate an alleged father before the PUR, and there were no case circumstances during the PUR that would warrant further efforts (e.g., additional information about the father's identity or location was discovered), questions related to the father in Item 13 should be answered Not Applicable.

Item 14: Caseworker Visits With Child

- In situations in which secondary worker visits are accepted in addition to primary worker visits, the frequency and quality of BOTH types of visits should be considered in the assessment.
- Ensure that reviewers have counted only face-to-face contacts between the caseworker or other responsible party and the child(ren). Virtual visits with children are not considered in this item absent a declared state of emergency and an active, associated policy allowing virtual visits in limited circumstances.
- For children placed out of state, ensure that reviewers have considered the local worker as a "caseworker" if they are a caseworker from the jurisdiction in which the child is placed, even if they don't meet the definition of "other responsible party." Also, for Interstate Compact on the Placement of Children (ICPC) cases, ensure that reviewers are not applying any sending-state caseworker visitation requirements (i.e., annual) when assessing visitation frequency.
- Discuss with reviewers how visitation frequency met the needs of the child and circumstances of the case in ensuring safety, permanency, and well-being.
- If visitation frequency is less than once per month or is less than needed based on the needs of the child and case circumstances, question A should be answered No unless reviewers have substantial justification for answering Yes.

- If question B is answered Yes, ask reviewers to describe the quality of the visits (e.g., location, length, content). Ensure that the child(ren) was/were visited alone for at least part of each visit and that conversations focused on the child(ren)'s needs, services, and case goals.
- If the child(ren) is non-verbal or has not reached the stage of development where they are comfortable being away from their parent or foster parent, ensure that visitation was conducted in a way that was sensitive to the child's needs but allowed assessments of safety and well-being. In addition, ensure that the caseworker visited the child in the foster home, assessed the child's living arrangements, and assessed the child's interactions with caregivers when determining the quality of visitation.

Item 15: Caseworker Visits With Parents

- In situations in which secondary worker visits are accepted in addition to primary worker visits, the frequency and quality of *both* types of visits should be considered in the assessment.
- Ensure that reviewers have counted only face-to-face contacts between the caseworker or other responsible party and the parent. In answering questions A2 and B2, reviewers may include non-private visits such as family team meetings, case planning meetings, and supervised visitations if it involves face-to-face contact between the caseworker/responsible party and the parent. However, reviewers will need to address the quality of those visits in questions C and D, considering the location of the visit, including whether or not the location was conducive to open and honest communication between the parent(s) and caseworker.
- Absent a declared state of emergency and an active, associated policy allowing virtual visits in limited circumstances, virtual visits cannot be considered when determining the frequency of face-to-face visits with parents. Depending on the specific case circumstances, virtual visits can be considered as part of the substantial justification for less than monthly actual face-to-face visits. However, reviewers should determine if the overall quality of the visits, considering the use of virtual visits, was sufficient based on the specific case circumstances and changes in the case over time.
- If visit frequency is less than once per month, questions A2 and B2 should be answered No unless reviewers have substantial justification for answering Yes. Discuss the documented efforts made by the caseworker to meet with the parents, the reasons why a parent was non-responsive, and whether less-than-monthly visits were sufficient to address the safety, permanency, and well-being of the child(ren) and achievement of case goals given the specific case issues.
- Discuss with reviewers how visitation frequency did or did not support achievement of case goals and effectively address the child's safety, permanency, and well-being.
- If question C and/or D is Yes, ask reviewers to describe the quality of the visits (e.g., location, length, content).
- If reviewers have indicated that a parent is not applicable because Item 12B is rated as an Area Needing Improvement due to lack of concerted efforts to identify or locate applicable parents, ensure that this determination is appropriate based on case circumstances.
- If the child came into foster care before the PUR, the agency made concerted efforts to identify/locate an alleged father before the PUR, and there were no case circumstances during the PUR that would warrant further efforts (e.g., additional information about the father's identity or location was discovered), questions related to the father in Item 15 should be answered Not Applicable.

Item 16: Educational Needs of the Child

- If “services needed but not provided” were listed in the table but question B is answered Yes, discuss what concerted efforts were made to advocate for services.
- Discuss with reviewers whether and how the services provided addressed all of the identified needs and were tailored to the specific needs of the child(ren), accessible, and monitored and adjusted, as needed, to ensure progress.

Item 17: Physical Health of the Child

- Review any state policies and protocols for physical health exams, including dental health, to ensure that reviewers appropriately considered compliance with any protocols in place, or with Early and Periodic Screening, Diagnosis and Treatment (EPSDT) guidelines in the absence of such policies and protocols.
- Discuss with reviewers whether the agency’s informal assessments included a review of any formal assessments completed and collateral contacts, and a substantive understanding of the child(ren)’s needs.
- If “services needed but not provided” were listed in the table but question B is answered Yes, discuss the circumstances with reviewers to ensure item instructions were followed.
- Discuss with reviewers whether and how the services provided addressed all of the identified needs and were tailored to the specific needs of the child(ren), culturally appropriate, accessible, responsive, and monitored and adjusted, as needed, to ensure progress.
- If question B1 is answered Yes or No, discuss with reviewers which medication was prescribed and how it was monitored. Review any state protocols for medication monitoring to ensure reviewers appropriately considered compliance with any protocols in place.

Item 18: Mental/Behavioral Health of the Child

- Discuss with reviewers whether the agency’s informal assessments included a review of any formal assessments completed and collateral contacts, and a substantive understanding of the child(ren)’s needs.
- If “services needed but not provided” were listed in the table but question B is answered Yes, discuss the circumstances with reviewers to ensure item instructions were followed.
- Discuss with reviewers whether and how the services provided addressed all of the identified needs and were tailored to the specific needs of the child(ren), culturally appropriate, accessible, responsive, and monitored and adjusted, as needed, to ensure progress.
- If question B is answered Yes or No, discuss with reviewers which medication was prescribed and how it was monitored. Review any state protocols for medication monitoring to ensure reviewers appropriately considered compliance with any protocols in place.
- If a child/youth is not progressing despite therapeutic intervention, discuss with reviewers the agency’s efforts to continually assess the adequacy of the interventions and make needed modifications. Ensure that reviewers have looked at relevant reports and assessments, and have conducted appropriate interviews, when possible, to determine the adequacy of services provided. There may be situations where a child’s behavior does not show improvement despite the best efforts to address concerns, so ensure that such circumstances do not negatively affect the rating.

Instructions for Short-Term Foster Care Cases

Apply the following guidance when rating foster care cases in which the child has been in foster care for fewer than 45 days:

Items 1–7, 10, 14, and 16–18: There is no difference in rating/applying the instrument for these items.

Item 8: A Not Applicable rating for this item should be based on the length of time the case is open, the case circumstances, and how reasonable it is to expect visits to have been arranged with the target child and parents/siblings. Typically, a child should have visits arranged within 1 to 2 weeks of being placed in foster care.

Item 9: A Not Applicable rating for this item should be based on the length of time the case is open, the case circumstances, and how reasonable it is to expect the agency to have made efforts to maintain connections for the target child.

Item 11: A Not Applicable rating for this item should be based on the length of time the case is open, the case circumstances, and how reasonable it is to expect the agency to have made efforts to strengthen the parent-child bond while the child is in care through activities other than visitation.

Item 12: Because reunification is assumed to be the goal in short-term foster care cases unless there is evidence that another goal is in place, this item should be rated based on the assessment and services necessary, while the case is open, to achieve reunification (or another goal). If the parents' whereabouts are unknown, reviewers should clarify with QA staff what is reasonable to expect, based on the case circumstances, regarding efforts to locate the parents in the short period of time the case was open, to determine whether this item is applicable for parents (Sub-Item 12B).

Item 13: Because reunification is assumed to be the goal in short-term foster care cases unless there is evidence that another goal is in place, this item should be rated based on the planning that occurs regarding case direction while the case is open, given that a formal case plan may not be expected in short-term cases. If the parents' whereabouts are unknown, reviewers should clarify with QA staff what is reasonable to expect, based on the case circumstances, regarding efforts to locate the parents in the short period of time the case was open, to determine whether this item is applicable for parents.

Item 15: There is no difference in rating/applying the instrument for this item unless the parents' whereabouts are unknown. If the parents' whereabouts are unknown, reviewers should clarify with QA staff what is reasonable to expect, based on the case circumstances, regarding efforts to locate the parents in the short period of time the case was open, to determine whether this item is applicable for parents.

Instructions for Foster Care Cases Involving a Youth on Runaway Status for a Majority of the PUR

Apply the following guidance when rating foster care cases in which the child has been on runaway status for a majority of the PUR:

Items 1, 2, 7 and 10: There is no difference in rating/applying the instrument for these items.

Item 3: The efforts being made to locate the child should be considered positively in the reviewer's overall evaluation of ongoing risk/safety assessment during the PUR. However, if the agency is not taking all reasonable steps to find the child, it follows that the agency would be unable to appropriately assess risk and safety threats for the child/youth.

Items 5, 6 and 12: Regardless of the agency's efforts to locate a youth on runaway status, the agency should still be able to identify appropriate permanency goals for the child, work toward achieving timely permanency (e.g., by searching for/preparing permanent placements for the child or working with parents

toward reunification based on case circumstances) and formulate assessments of the youth's needs, including identifying needed services for the child. Therefore, Items 5, 6, and 12 should be rated based on the agency's efforts in these areas.

Items 8, 11, 13, 14 and 16–18: If the agency is actively attempting to locate the child on an ongoing basis, the reviewer should not consider the period of time during which the child was on runaway status in the assessment of these items (as applicable).

If a child is on runaway status for the entire PUR and their whereabouts are truly unknown, discuss whether sufficient information exists via the case record and case-related interviews to rate the case on practice that occurred during the PUR. If not, discuss the need for case elimination.

Instructions for Foster Care Cases Involving the Removal of a Reunification Goal During the PUR

Apply the following guidance when rating foster care cases in which the agency stops working toward reunification, a cease reunification order has been issued, or a TPR occurred during the PUR:

Items 1–7, 10, 12A, 12C, 14 and 16–18: There is no difference in rating/applying the instrument for these items.

Items 8 and 11: Reviewers need to consider the case circumstances and the best interests of the child in determining the applicability of these items. If the child welfare system determined that it is in the child's best interests to continue visitation or continue supporting the relationship after the parent is no longer working toward reunification, a cease reunification order is issued, or a TPR occurs during the PUR, that parent would remain applicable in Items 8 and 11. If it was not in the child's best interests to continue to support the relationship with that parent based on case circumstances, from that point in the PUR Items 8 and 11 would stop being applicable.

Item 12B: Circumstances may warrant continued work with parents despite a change in goal from reunification during the PUR, but the application of the item instructions may shift due to the case circumstances. For example, a comprehensive assessment and services to support all identified needs may not be applicable in cases where the parent and agency are no longer working toward the goal of reunification. However, an assessment of what the parent may need to continue a positive relationship with the child post-TPR or after goals of guardianship or APPLA are established, and services to support that need, is warranted and should be captured in 12B.

Item 13: Although the case plan goal of reunification may have changed, the agency should still be engaging with the child and parents, as appropriate, to work toward an alternative permanency goal and ensure that any other case goals (such as supporting a positive long-term relationship post-TPR between the parent and child) are achieved.

Item 15: Monthly contact may no longer be warranted based on case circumstances, but adequate contact with the parent to continue to work toward permanency for the child and ensure that any other case goals are achieved should be assessed, as applicable. This may be monthly or less than monthly contact, depending on the circumstances.

Instructions for In-Home Services Cases Involving Children Residing in Temporary, Alternative Caregiver Arrangements

Apply the following guidance when rating in-home services cases in which the child is living with temporary, alternative caregiver arrangements, such as with extended family members or family friends via voluntary agreements with the parent(s), conditional custody orders, or other court orders that do *not* place the child under the care and placement responsibility of the agency:

Face Sheet: Reviewers should indicate in the Case Participant Table all the alternative caregivers with whom the child(ren) are living. This will help to determine who will be rated in Items 2, 12A, and 12B and what homes need to be considered in risk/safety assessments in Item 3.

Item 1, 13, and 15: There is no difference in rating/applying the instrument for these items.

Item 2: Reviewers should not consider the child(ren)'s placement in a temporary, alternative caregiver arrangement outside the family home as an "entry into foster care" because the child welfare agency does not have placement and care responsibility for these children. Also, placement with an alternative caregiver is not considered a safety service. However, any services that are needed to support, implement, maintain, or supplement such approaches to ensuring child safety should be addressed in Item 2. In addition, services needed to ensure the child(ren) can be returned to a parent after an alternative caregiver arrangement ends should also be captured under Item 2. For additional information, see "Reviewer Brief, Application of CFSR OSRI, Item 2: Services to Family to Protect Child(ren) in the Home and Prevent Removal or Re-Entry Into Foster Care."

Item 3: When responding to questions 3A and 3B, reviewers should consider whether risk and safety assessments were conducted in the home(s) where children were living as well as in the home of their biological/legal parent(s). When responding to question 3C, the safety plan would include the strategies developed by the agency and family to ensure that the child(ren) are safe.

Sub-Item 12A: Alternative caregivers should have their needs assessed and be provided necessary services related to their ability to meet the identified needs of the child(ren) living with them. Therefore, the assessment and services for these caregivers would be captured in 12A for the child(ren). The agency is not required to conduct a comprehensive assessment of these caregivers as they are for parents in 12B because these caregivers are not the focus of the case plan and are not the legal/permanent caregivers for the child(ren). If an alternative caregiver becomes a legal guardian or adoptive parent of a child during the PUR, the alternative caregiver would also be included as a parent in 12B starting on the date when legal guardianship was established.

Instructions for Foster Care Cases Involving ICPC

Apply the following guidance when rating foster care cases in which the child was placed with a relative via an ICPC agreement for a majority of the PUR:

Items 3 and 14: Although the sending state has asked the receiving state to monitor the child's safety, permanency, and well-being through an ICPC agreement, the sending state is still responsible for reviewing ICPC reports and ensuring that the child is safe, and that the child's needs are being addressed by the receiving state. To answer questions for Items 3 and 14, reviewers should talk to the sending state regarding the child's safety (Item 3), and caseworker visits with the child (Item 14), as well as review ICPC reports and possibly conduct a phone interview with other case participants, such as the receiving state's caseworker, the relative caregivers, and the child.

Item 15: Reviewers would need to ascertain the location of the parent and determine which state is conducting visits with the parent, although the sending state should ensure that these contacts are being made.

Instructions for Foster Care Cases for Which a Tribe Has Full Case Management Responsibility Pursuant to a Title IV-E Agreement

Apply the following guidance when rating foster care cases for which a Tribe has full case management responsibility pursuant to a title IV-E agreement during the PUR:

A child who is covered by an agreement between the state child welfare agency and a Tribe (i.e., the child is receiving title IV-E foster care maintenance payments) is included in the CFSR sample even if the Tribe

has full case management responsibility. When such an agreement is in place, the Tribe is acting on behalf of the state, and the Indian children under the IV-E agreement are afforded the same protections as children under the care and control of the state agency. Tribes that enter into agreements under § 472(a)(2)(B) of the Social Security Act are subject to all applicable federal statutory, regulatory, and policy guidance as well as state rules that implement federal requirements. Even if the IV-E agreement does not allow the state child welfare agency access to records, the state is still required to provide information for the purposes of the CFSSR. The Tribe's program is therefore subject to review under the CFSSR and IV-E requirements (§§ 471(a)(6) and 1123A of the Act), and there are no differences in how the items are applied other than Item 1, which would consider the Tribal policies and procedures related to initiation and face-to-face contact timeframe requirements rather than those of the state agency.