

LEGISLATIVE AUDIT DIVISION

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MEMORANDUM

TO: Legislative Audit Committee Members
FROM: Christiane Rudmann, Management & Program Analyst
CC: Department of Public Health and Human Services
Charles Brereton, Director
Erica Johnston, Executive Director, Human Services
Nikki Grossberg, Administrator, Child & Family Services Division
DATE: August 2023
RE: Performance Audit Follow-Up (23SP-09): *Kids in Care: Analysis of Population Trends and Management Processes in Montana's Foster Care System* (19P-01)
ATTACHMENTS: Original Performance Audit Summary

Introduction

The *Kids in Care: Analysis of Population Trends and Management Processes in Montana's Foster Care System* (19P-01) report was issued to the Legislative Audit Committee in February 2022. The audit included four recommendations to the Department of Public Health and Human Services (DPHHS). We conducted follow up work to assess implementation of the report recommendations. This memorandum summarizes the results of our follow-up work.

Overview

Audit work recommended the Child and Family Services Division (CFSD) conduct a formal review of the Safety Assessment and Management System (SAMS) model, including its documents and processes, to ensure forms and procedural options are clear to staff. We also recommended refresher training on the updated SAMS model for regional management. Our remaining recommendations included implementing data-based measures to evaluate the progress of CFSD's prevention interventions and modernizing Montana's child welfare information system. We found the department implemented one of the audit recommendations, two recommendations are being implemented, and one recommendation has not been implemented. In response to the audit, the department conducted a thorough review of the SAMS model and continues to refine the relevant forms. They implemented ongoing training on the SAMS model for leadership staff, regional management, and supervisors. The department also contracted with Montana State University (MSU) for the analysis of its prevention efforts. However, the results of the analysis are limited at this time. Lastly, the department received legislative funding and made progress towards the development and implementation of a comprehensive child welfare information system.

Background

The Child and Family Services Division (CFSD) of DPHHS is responsible for investigating potential cases of abuse and neglect. If CFSD finds abuse or neglect has taken place, they respond in one of two ways. They alleviate the safety threats in the home or remove the child from the home and place them in foster care. When a child is removed from the home and placed in foster care, they are considered a kid in care. Montana has consistently ranked near the top in the number of kids in care per capita, including experiencing a rapid increase in the number of kids in care from 2010 to 2019 with a peak in 2018. Montana had the second highest ratio of kids in care in the nation at 16 kids per 1,000 in 2019. This has created growing interest in the number of kids removed from their homes and what factors contribute to

this rise. Since 2011 CFSD has used the Safety Assessment and Management System (SAMS) model to investigate abuse and neglect of Montana children. The model uses the investigation process as an opportunity to engage with the family to determine the safety threats in the home and how best to address them.

The performance audit examined whether there is a correlation between Montana's comparatively high number of kids in care and the use of the SAMS model as implemented by CFSD. The audit found the department had inconsistently implemented the model which likely contributed to the rising levels of kids in care. We found regional management had an inconsistent understanding of the purpose and importance of individual parts of the SAMS model. CFSD also failed to continually update and review the investigative process and its fidelity to the original SAMS model. Additionally, CFSD was still operating its services on outdated IT systems that did not align with federal guidance.

Audit Follow-up Results

The following sections summarize the progress toward implementation of the report recommendations. To complete our follow-up work, we interviewed DPHHS staff and reviewed updated training materials for the SAMS model. We also reviewed updated SAMS model documentation, including its use in case work, in each of the six CFSD regions in Montana. DPHHS has implemented one of the audit recommendations, two recommendations are being implemented, and one recommendation has not been implemented.

Recommendation #1

We recommend the Department of Public Health and Human Services:

- A. Conduct a review of the SAMS model to ensure all elements are appropriate and align with best practices.**
- B. Update SAMS documents to reflect current policy, best practice, and to provide staff clarity on using the SAMS model.**

Implementation Status – Being Implemented

During audit work, we found the department needed to conduct a formal review of the SAMS model. Multiple SAMS documents contained conflicting information and caused staff confusion. During follow-up work, department staff demonstrated progress towards implementing the recommendation. They set up a safety committee upon completion of the original audit. The committee conducts an ongoing review of the model, including a review of its documents and processes. They also conduct fidelity reviews on individual cases to ensure compliance to the model. The committee is made up of CFSD employees from different levels across the state. Follow-up work showed a thorough review of the model. Resulting changes have increased clarity for the staff. As part of the follow-up work, we also reviewed field staff's use of the updated SAMS forms in case files across the state. CFSD staff use SAMS forms to capture observations and key findings throughout the initial investigation of alleged abuse and neglect. We found structural issues still exist in SAMS forms, such as a lack of clarity when a supervisor signature is required and the need to capture the same information in multiple forms. Issues within the information systems used by the division also contribute to ongoing documentation issues. However, the division has taken positive steps to improve the SAMS process and its documentation for their staff. We therefore consider this recommendation as being implemented.

Recommendation #2

We recommend the Department of Public Health and Human Services develop and provide ongoing training to regional administration that is focused on the purpose and importance of the SAMS model to ensure it is uniformly understood.

Implementation Status – Implemented

The original audit work found the department focused training on newer staff. Continuing education for more senior staff and management was limited. We found ongoing guidance to staff had become inconsistent across regions and drifted from the SAMS model. During follow-up work, we reviewed

updated training materials on the SAMS model for the CFSD management team, state supervisors, and regional administrators. In March 2022, CFSD started regularly providing the updated training to senior staff and management. The trainings cover the purpose of the SAMS model, its processes, and required documentation. Regional administrators value the opportunity for discussion and peer-to-peer learning provided by the trainings. Regional administrators also implemented SAMS model trainings for regional supervisors and their field staff. CFSD uses case files to review fidelity to the SAMS model with staff. This adds yet another learning opportunity.

Recommendation #3

We recommend the Department of Public Health and Human Services:

- A. Determine through data-based measures that Family Support Teams and Safety Resource Specialists lead to an increased use of prevention plans.**
- B. Adjust the program if it does not lead to results.**

Implementation Status – Not Implemented

The original audit found the department piloted and later implemented Family Support Teams (FSTs) led by a Safety Resource Specialist in four of the six CFSD regions in Montana. Additionally, the department focused on developing a framework for the use of prevention plans. FSTs are a tool to connect families with the services necessary for a child to stay in their home during CFSD's involvement with the family. A prevention plan is a voluntary agreement between the CFSD and the family. It details how the family will use the services initiated by the FST or other CFSD field staff to keep the child safe in the long term. We found the department had not established goals or data measures to determine if the FST program increased the use of prevention plans. While the department contracted with Montana State University (MSU) for an annual analysis of CFSD's use of prevention plans, the possible contribution of FSTs towards an increased use of prevention plans is not part of MSU's analysis. Additionally, preliminary observations of the data available during the follow-up indicate significant data is missing making large scale generalizations difficult. Both aspects lead us to the conclusion that the MSU analysis is not yet a viable tool to establish goals and objectives for the use of FSTs and prevention plans. CFSD management also indicated their IT system limits the data they can gather on prevention plan use. MSU suggested there may be an opportunity to increase the use of prevention plans. At this time, CFSD does not have the prevention plan data to determine if an increase in FSTs has contributed to more families engaging in prevention plans. We therefore consider this recommendation not implemented. However, data shows an increasing percentage of families engaging in an FST have their children remain in the home.

Recommendation #4

We recommend the Department of Public Health and Human Services:

- A. Modernize the child welfare system based on federal government guidance.**
- B. Use the increased data capacity of this system to create and implement a data management plan.**

Implementation Status – Being Implemented

The original audit found the department needed to modernize Montana's child welfare information system. The current system does not allow CFSD to produce real time management information to make data-driven decisions and measure performance. The department uses a combination of dated information systems that are limited in their capabilities to support the delivery of child protective services. Moving forward, the department will replace its legacy system (Child and Adult Protection System, CAPS) with a *Comprehensive Child Welfare Information System* (CCWIS) compliant with federal requirements. The first phase was completed in 2018. Subsequent phases have been delayed multiple times in recent years. Follow up work found the department made progress toward fully implementing the recommendation. The 2023 Montana Legislature appropriated \$25,075,762 for the department to develop a CCWIS compliant system. The funding is evenly split between the general fund and matching federal funds. Following the 2023 Legislative Session, the department issued a Request for Information (RFI) on July 10, 2023 regarding the design, development, and implementation of a CCWIS. DPHHS received about 25 submissions in response to the RFI by the closing deadline. An IAPD (Implementation Advance Planning

Document) to request the \$12.5 million in federal funding for system design, development, and implementation of the CCWIS from the federal Administration for Children and Families (ACF) is due November 1, 2023. Once the IAPD, including a data management plan, is submitted, ACF has 60 days to review and approve the plan, conditionally approve the plan, or deny the plan. Montana anticipates approval to move forward with the project to be granted by January 2024. Implementation of a CCWIS has been delayed previously. Until ACF approves the department's plan and the department issues a Request for Proposal (RFP) and subsequently awards a contract to implement a CCWIS, CFSD will conduct its work using its dated information systems.