

**EXECUTIVE SUMMARY**  
**Final Report: Oklahoma Child and Family Services Review**  
**March 2008**

**INTRODUCTION**

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Oklahoma. The CFSR is the Federal Government's program for assessing the performance of State child welfare (CW) agencies with regard to achieving positive outcomes for children and families. It is authorized by the Social Security Amendments of 1994 requiring the Department of Health and Human Services (HHS) to promulgate regulations for reviews of State child and family services programs under titles IV-B and IV-E of the Social Security Act. The CFSR is implemented by the Children's Bureau of the Administration for Children and Families (ACF) within HHS.

The Oklahoma CFSR was conducted the week of August 20, 2007. The period under review for the case reviews was from April 1, 2006, to August 8, 2007. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the Oklahoma Children and Family Services Division of the Oklahoma Department of Human Services (OKDHS)
- The State Data Profile, prepared by the Children's Bureau, which provides State CW data for fiscal year (FY) 2004, FY 2005, and the CFSR 12-month target period ending March 31, 2006
- Reviews of 65 cases at three sites throughout the State, including 31 cases in Oklahoma County, 17 cases in Muskogee County, and 17 cases in Comanche County
- Interviews or focus groups (conducted at all three sites and at the State level) with stakeholders, including but not limited to children, parents, foster parents, all levels of CW agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys

Information from each resource is presented for all of the items reviewed.

**Background Information**

The CFSR assesses State performance on 23 items relevant to seven outcomes and 22 items pertaining to seven systemic factors. In the Outcomes section of the report, an overall rating of Strength or Area Needing Improvement is assigned to each of the 23 items. An item may be assigned an overall rating of Strength if 90 percent of the applicable cases reviewed were rated as a Strength. State performance on the seven outcomes is evaluated as Substantially Achieved, Partially Achieved, and Not Achieved. In order for a State to be in substantial conformity with a particular outcome, 95 percent of the cases reviewed must be rated as having substantially

achieved the outcome. A State that is not in substantial conformity with a particular outcome must develop and implement a Program Improvement Plan (PIP) to address the areas of concern within that outcome.

ACF has set very high standards of performance for the CFSR Review. The standards are based on the belief that because CW agencies work with our country's most vulnerable children and families, only the highest standards of performance should be acceptable. The focus of the CFSR process is on continuous quality improvement; standards are set high to ensure ongoing attention to the goal of achieving positive outcomes for children and families with regard to safety, permanency, and well-being.

It should be noted, however, that States are not required to attain the 95 percent standard established for the CFSR Onsite Review at the end of their PIP implementation. ACF recognizes that the kinds of systemic and practice changes necessary to bring about improvement in particular outcome areas often are time-consuming to implement, and improvements are likely to be incremental rather than dramatic. Instead, States work with ACF to establish a specified amount of improvement or implement specified activities for their PIP. That is, for each outcome or item that is an area needing improvement, each State (working in conjunction with the Children's Bureau) specifies how much improvement the State will demonstrate and/or the activities that it will implement to address the areas needing improvement and determines the procedures for demonstrating the achievement of these goals. Both the improvements specified and the procedures for demonstrating improvement vary across States. Therefore, a State can meet the requirements of its PIP and still not perform at the 95 percent (for outcomes) or 90 percent (for items) level as required by the CFSR.

The second round of the CFSR assesses a State's current level of functioning with regard to child outcomes by once more applying high standards and a consistent, comprehensive case-review methodology. This is intended to serve as a basis for continued planning in areas in which the State still needs to improve. The goal is to ensure that program improvement is an ongoing process and does not end with the closing of the PIP.

Because many changes have been made in the onsite CFSR process based on lessons learned during the first round and in response to feedback from the CW field, a State's performance in the second round of the CFSR is not directly comparable to its performance in the first round, particularly with regard to comparisons of percentages. Key changes in the CFSR process that make it difficult to compare performances across reviews are the following:

- An increase in the sample size from 50 to 65 cases
- Stratification of the sample to ensure a minimum number of cases in key program areas, resulting in variations in the number of cases relevant for specific outcomes and items
- Changes in criteria for specific items to increase consistency and to ensure an assessment of critical areas, such as CW agency efforts to involve noncustodial parents

## **CFSR Findings Regarding Outcomes**

The 2007 CFSR identified several areas of high performance in Oklahoma with regard to achieving outcomes for children. Although Oklahoma did not achieve substantial conformity with any of the seven CFSR outcomes, the State did achieve overall ratings of Strength for the individual indicators pertaining to foster care re-entry (item 5), placing children in close proximity to their parents (item 11), and meeting children's physical health needs (item 22).

Also, Oklahoma performed at a relatively high level (although they did not meet the 95 percent required for substantial conformity) on the CFSR outcomes pertaining to the provision of services to meet children's educational needs (86.0 percent in substantial conformity) and physical and mental health needs (82.0 percent of cases in substantial conformity). The generally high level of performance on education may be attributed, in part, to Oklahoma's increased coordination with the school system to ensure children's needs are met and to greater accessibility to higher education for youth by using innovative programs and funding sources.

Oklahoma does not meet the national standards for the national data indicators pertaining to the absence of recurrence of maltreatment or the absence of maltreatment in foster care. The State also does not meet the national data indicators pertaining to the timeliness and permanency of reunification (Permanency Composite 1), timeliness of adoptions (Permanency Composite 2), achieving permanency for children in foster care for extended time periods (Permanency Composite 3), and placement stability (Permanency Composite 4).

The CFSR also identified areas of concern with regard to achieving outcomes for children and families. Permanency Outcome 1 (Children have permanency and stability in their living situations) was determined to be substantially achieved in only 35 percent of the cases reviewed. With Permanency Outcome 1, Oklahoma's lowest rating was for item 9, which pertains to achieving adoption in a timely manner. Performance on these items may be attributed at least in part to delays due to the agency not filing for termination of parental rights (TPR) in a timely manner or not requesting a court hearing for a finalized adoption and staff not completing necessary paperwork to complete the adoption. Item 7, which pertains to permanency goals for children, was rated low at 58 percent. This was attributed at least in part to the child's permanency goal not being established in a timely manner and TPR not being sought in accordance with the timelines set by the Adoption and Safe Families Act (ASFA). Permanency Outcome 2 (Continuity of family relationships and connections is preserved) was determined to be substantially achieved in 60 percent of the cases reviewed. Oklahoma's lowest rating was for item 16, which pertains to the relationship of the child in foster care with parents.

Concerns also were identified with regard to Well-Being Outcome 1 (Families have enhanced capacity to provide for children's needs), which was determined to be substantially achieved in only 48 percent of the cases. Item 17, which pertains to meeting the needs of children, parents, and foster parents, and item 20, which pertains to worker visits with parents, received the lowest ratings.

## **CFSR Findings Regarding Systemic Factors**

With regard to systemic factors, Oklahoma was found to be in substantial conformity with five of the seven systemic factors: Statewide Information System; Quality Assurance (QA) System; Training; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. These systems were highly praised by most stakeholders. They noted that the Statewide Information System can readily identify the status, demographic characteristics, placement, and goals of every child who is in foster care. The system is available 24/7, and agency staff can access the system easily.

Stakeholders reported that the QA System, which for the most part replicates the Federal CFSR, conducts QA reviews, analyzes findings, and prepares reports to ensure continuous quality improvement with regard to achieving positive outcomes for children and families. The Statewide Information System was reported to support all QA efforts as well as other agency functions.

Oklahoma also was found to be in substantial conformity with the systemic factor of Training. The State has continued to invest in the development of new curricula and the enhancement of existing curricula for both pre-service and in-service training of staff, providers, and foster caregivers. This systemic factor also was determined to be in substantial conformity in the initial CFSR.

Oklahoma is in substantial conformity on the Agency Responsiveness to the Community systemic factor. In the initial CFSR, this systemic factor also was determined to be in substantial conformity. Since the 2002 CFSR, the State has taken additional affirmative steps to reach out to both the public and private sectors as well as to ensure representation of OKDHS consumers (parents and youth), providers, staff, and partners in the development and implementation of systemic reforms. The State's efforts to engage the community and to include community input in PIP activities also are reflected in the goals, objectives, and activities associated with the Child and Family Services Plan (CFSP).

Oklahoma is in substantial conformity for the systemic factor Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State continues to make significant investments in licensing, recruiting, and supporting foster and adoptive parents. In the initial CFSR, this systemic factor also was determined to be in substantial conformity, and the State was not required to address it in the PIP. However, the lack of diligent targeted recruitment of parents to reflect the ethnic and racial diversity of children in the system, which also was identified as a need in the previous review, is an ongoing issue.

Oklahoma was not in substantial conformity with two of the seven systemic factors: Case Review System and Service Array. With regard to the Case Review System, the key concern identified by stakeholders and case reviewers pertained to the inconsistent involvement of parents in developing the case plan. In addition, although the State has a process in place for filing for TPR in the cases of children who have been in foster care, stakeholders in both the Statewide Assessment and the Onsite Review identified concerns with timely filing or achievement of TPR. These delays were attributed for the most part to court practices, such as delays in scheduling, a lengthy TPR process, and the refusal of some judges to pursue TPR unless there was an identified adoptive home for the

child. With regard to Service Array, the key concerns identified by stakeholders and case reviewers involved the demand for services exceeding resources, which often resulted in waiting lists for services and insufficient placement resources. While the statewide service delivery system is in place, service gaps do exist and were identified in some key service categories, including substance abuse, housing, and post-permanency. In addition, some areas of the State were identified as not having sufficient services to meet demands, resulting in delayed access to particular services such as dental, medical, behavioral, and mental health services. Also, a lack of transportation reportedly affects service accessibility in some regions of the State. In the 2002 CFSR, the State was not in substantial conformity and was required to address this factor in its PIP.

The specific findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance with regard to the seven systemic factors assessed through the CFSR. In the following section, key findings are summarized for each outcome and systemic factor.

## **I. KEY FINDINGS RELATED TO OUTCOMES**

### **Safety Outcome 1: Children are first and foremost protected from abuse and neglect**

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to the recurrence of substantiated or indicated maltreatment (item 2).

Oklahoma did not achieve substantial conformity with Safety Outcome 1. The outcome was determined to be substantially achieved in 67.64 percent of the applicable cases, which is less than the 95 percent or higher required for a rating of substantial conformity. There was little variation in performance on this outcome across counties. Oklahoma did not meet the national standards for the two data indicators pertaining to Safety Outcome 1, which refer to the absence of maltreatment recurrence and absence of maltreatment of children in foster care by foster parents or facility staff. Oklahoma was not in substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP. The agency implemented the following action steps in its PIP as a result of the 2002 CFSR to address Safety Outcome 1:

- Reviewed and revised policy and procedures to address the population to be served and the criteria for screening investigations and assessments
- Increased consistency of prioritization and response to allegations of maltreatment
- Provided training to all supervisors on screening and safety assessments
- Used State CFSR case reviews to focus attention on the timeliness of prioritization and response of investigations

The State met its target goals for this outcome by the end of the PIP implementation period. Findings from the 2007 CFSR indicate Oklahoma continues to struggle with a lack of consistency in screening, assessment of abuse and neglect cases, and timeliness of

initiating investigations, leading to multiple referrals and repeat maltreatment. The 2007 Statewide Assessment attributed challenges with safety to the practice of staff responding to child abuse and neglect reports as incident-based as opposed to risk-based assessment. Another common theme from 2002 that re-appeared in the 2007 CFSR was the high level of staff turnover among the CW agency's frontline workers, which results in inexperienced staff and high caseloads.

Additional key findings in 2007 for this outcome were the following:

- Item 1 (timeliness of initiating investigations) was rated as a Strength in 82 percent of the cases.
- Many stakeholders expressed the opinion that the State is making concerted efforts to reduce maltreatment recurrence, but because some families are resistant to accessing the services, there is an ongoing risk of maltreatment recurrence.

### **Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate**

Performance on Safety Outcome 2 is assessed through two indicators. One indicator (item 3) addresses the issue of CW agency efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the CW agency's efforts to reduce the risk of harm to the children.

Oklahoma did not achieve substantial conformity with Safety Outcome 2. The outcome was determined to be substantially achieved in 67.69 percent of the cases reviewed, which is less than the 95 percent or higher required for a rating of substantial conformity.

Performance on this item varied across counties. The outcome was substantially achieved in 58 percent of Oklahoma County cases, compared to 76 percent of Comanche County and Muskogee County cases. Oklahoma was not in substantial conformity with this outcome for the 2002 CFSR. The agency implemented the following action steps in its PIP as a result of the 2002 CFSR to address Safety Outcome 2:

- Increased consistency and use of safety assessment protocols, safety, planning, and voluntary service referrals for children in their own homes through a revision of policy and risk/safety assessment and safety planning instruments
- Transferred responsibility for voluntary services for families and children and directed additional funds to Oklahoma Children's Services (OCS) contractors

The State met its target goals for this outcome by the end of the PIP implementation period. Findings from the 2007 CFSR indicate progress was made through the contracted provider, Comprehensive Home Based Services (CHBS), to address ongoing assessment of risk to children before and during reunification in the home. The 2007 CFSR also indicates that Oklahoma continues to struggle with engaging families in voluntary services to prevent removal and assess risk. Stakeholders in the metropolitan areas identified a new issue in the 2007 CFSR involving law enforcement's authority to remove a child without a court order, which often results in removal of a child before DHS involvement.

Additional key findings in 2007 for this outcome concerned the following:

- Children placed in foster care without providing services to children or families to prevent removal from the home
- Lack of ongoing assessment of the families' needs to address safety issues while the child is in the home
- Workload issues that result in staff not taking the time needed to refer families for voluntary services and not always recommending or providing available community services unless the circumstances are serious enough for a referral to CHBS
- Lack of consistency in providing sufficient services to children and families to address risk of harm issues
- Risk of harm to children who remained in their own homes and no provision of services necessary to reduce that risk
- Safety plans established that were insufficient to address risk
- Insufficient ongoing risk assessment in the foster home or relative or fictive kin placement setting
- Risk of harm present and not addressed during visitation with parents, particularly trial home visits

### **Permanency Outcome 1: Children have permanency and stability in their living situations**

There are six indicators incorporated in the assessment of Permanency Outcome 1, although not all of them are relevant for all children. The indicators pertain to the CW agency's efforts to prevent foster care re-entry (item 5), ensure placement stability for children in foster care (item 6), and establish appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on the CW agency's efforts to achieve permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9) or to ensure that children who have Other Planned Living Arrangements (OPPLA) as a case goal are in stable placements and adequately prepared for eventual independent living (item 10).

In 2007, Oklahoma did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 35.0 percent of the cases, which is less than the 95 percent required for an overall rating of substantial conformity.
- The State Data Profile indicates that for the CFSR 12-month target period, the State did not meet the national standards for Permanency Composite 1: Timeliness and permanency of reunification, Permanency Composite 2: Timeliness of adoptions, Permanency Composite 3: Permanency for children in foster care for extended time periods, and Permanency Composite 4: Placement stability.

Oklahoma's performance on this outcome was low in all sites, and there was little variation across sites. The outcome was found to be substantially achieved in 35 percent of Oklahoma County cases, 40 percent of Muskogee County cases, and 30 percent of Comanche County cases. Oklahoma was not in substantial conformity with this outcome in its 2002 CFSR, and the outcome was addressed in the

State's PIP. The agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR to address Permanency Outcome 1:

- Improved reunification protocol to include risk and safety assessment, provision of services, and monitoring
- Refined contractual expectations and guidance for non-voluntary OCS reunification services
- Initiated strategies to improve partnerships with local courts and district attorneys to promote permanency
- Established policy timeframes for initial consultation for adoption cases
- Established training for staff on timely TPR and adoption finalization

Oklahoma met its target goals for this outcome before the end of the PIP implementation period. Findings from the 2007 CFSR indicate Oklahoma has made improvements in the reunification protocol through the service provider, CHBS, to prevent children's re-entry into foster care. A new issue identified in the 2007 CFSR was the use of emergency shelter care for placement for children, including infants and toddlers, as opposed to locating a placement that matches the needs of the child. The 2007 CFSR also indicated that the relationship between OKDHS and the courts and district attorneys, while improved, sometimes continues to be a barrier in achieving timely permanency for children.

Additional key findings in 2007 for this outcome were the following:

- The rate of re-entry into foster care was found to be a strength for the State (item 5)
- Placement stability continues to be a challenge for the State, with 41 percent of children having two or more placements during the period under review (item 6).
- The agency was not consistent with regard to establishing a child's permanency goal in a timely manner, and the goal of reunification was maintained for an excessive period of time (item 7).
- The agency was not consistent with regard to attaining the goals of reunification, permanent placement with relatives, or guardianship in a timely manner (item 8).
- The agency was not consistent with regard to achieving adoptions in a timely manner. Barriers to timely adoptions were both court-related (i.e., scheduling, continuances, appeals) and agency-related (i.e., delayed TPR filing and requests for court hearings and insufficient efforts to find adoptive homes) (item 9).
- The agency did not make concerted efforts to ensure a long-term placement for the child and provide necessary services to prepare for independent living (item 10).

Key concerns expressed in the 2007 CFSR by stakeholders with regard to permanency were the following:

- Foster parents do not receive adequate information about children's behavioral needs.
- Substance abuse and domestic violence are not adequately addressed before reunification occurs.
- Children are not being placed initially in the appropriate placements that meet their needs, and there are not enough adoptive homes for the children in foster care.

## **Permanency Outcome 2: The continuity of family relationships and connections is preserved for children**

Permanency Outcome 2 incorporates six indicators that assess the CW agency's performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Oklahoma did not achieve substantial conformity with Permanency Outcome 2. The outcome was rated as substantially achieved in 60.0 percent of the cases, which is less than the 95 percent or higher required for substantial conformity. Performance on this outcome did not vary across sites. The outcome was determined to be substantially achieved in 60 percent of Comanche, Muskogee, and Oklahoma County cases. Oklahoma did not achieve substantial conformity with this outcome in its 2002 CFSR and addressed the outcome in its PIP. The agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR to address Permanency Outcome 2:

- Improved connections and relationships for children through increased involvement of relatives (especially fathers and paternal relatives) and Tribes
- Developed and improved diligent search capacity and procedures to promote and improve family and Tribal connections for children

The State met its target goals for this outcome by the end of the PIP implementation period. In the 2007 CFSR, placement with - siblings (item 12), visitation with parents and siblings in foster care (item 13), and promoting the relationship between children in foster care and their parents (item 16) were identified as areas needing improvement in 2007, as opposed to strengths in the 2002 CFSR. Consistently exploring relative placement and identifying and locating fathers continue to be challenges, despite the development of diligent search capacity. Stakeholders in 2007 reported difficulty in maintaining children's connections to their community, extended family, and Tribes when children are not placed in the community from which they were removed.

Additional findings in 2007 for this outcome were the following:

- Children were routinely and consistently placed in close proximity to parents or potential permanent caregivers (item 11).
- Children were not consistently placed with siblings (item 12).
- There was a lack of consistency with regard to promoting visitation between or among siblings in foster care (item 13).
- There was a lack of consistency with regard to efforts to maintain the child's connection with extended family, culture, and community (item 14) and with regard to efforts to maintain and strengthen the parent-child relationship while children are in foster care (item 16).
- The agency was not consistent with regard to seeking and evaluating relatives as potential placement resources (item 15).

## **Well-Being Outcome 1: Families have enhanced capacity to provide for their children's needs**

Well-Being Outcome 1 incorporates four indicators. One pertains to the CW agency's efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator examines the CW agency's efforts to actively involve parents and children (when appropriate) in the case-planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker's contacts with the children in their caseloads (item 19) and with the children's parents (item 20).

Oklahoma did not achieve substantial conformity with Well-Being Outcome 1. The outcome was determined to be substantially achieved in 48.0 percent of the cases reviewed, which is less than the 95 percent required for a determination of substantial conformity. Performance on this outcome varied across sites. The outcome was determined to be substantially achieved in 59 percent of Comanche County cases, 29 percent of Muskogee County, and 52 percent of Oklahoma County cases. Performance varied based on the type of case. The outcome was found to be substantially achieved in 58 percent (23 cases) of the 40 foster care cases, compared to 32 percent (8 cases) of the 25 in-home services cases. Oklahoma did not achieve substantial conformity with this outcome during its 2002 CFSR. For the 2002 CFSR, all four items incorporated in the outcome were rated as Areas Needing Improvement and were addressed in the State's PIP. The agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR to address Well-Being Outcome 1:

- Increased involvement of relatives, especially fathers, paternal relatives, and Tribes
- Developed and implemented a diligent search capacity to locate relatives, especially fathers
- Simplified the Individual Service Plan to focus on identification, assessment, and meeting needs of families
- Developed and introduced contact guides for use in the field by staff
- Implemented State CFSR case reviews

The State met its target goals for this outcome by the end of the PIP implementation period. Although not fully implemented during the 2007 CFSR, Family Group Conferencing and Family Team Decision Meetings are planned to improve performance on Well-Being Outcome 1, particularly with regard to assessment and provision of services and family involvement in case planning. According to the 2007 CFSR findings, improvement in monitoring and use of contact guides during worker visits with children appeared to have improved the frequency and quality of visits. The 2007 CFSR findings indicate that assessment and provision of services for fathers remains a challenge. In stakeholder interviews in 2007, it was noted that even though policy requires monthly contact between caseworkers and parents, caseworkers have the perception that initiating those contacts is the parents' responsibility. As in 2002, stakeholders in 2007 attribute the challenges of Well-Being Outcome 1 to excessive caseloads often related to staff turnover.

Additional key findings in 2007 for this outcome were the following:

- Although the ratings for the item assessing caseworker contact with children (80 percent rated as a Strength) did not meet the 90 percent Strength requirement for an overall rating of Strength, contacts were noted to be of sufficient frequency and quality to meet the needs of the child.
- There was a lack of consistency with regard to adequately assessing and meeting the needs of parents, particularly fathers.
- The agency was inconsistent in involving parents and children in case planning.
- There was a lack of sufficient contact with fathers and mothers.

### **Well-Being Outcome 2: Children receive appropriate services to meet their educational needs**

There is only one indicator for Well-Being Outcome 2. It pertains to the CW agency's efforts to address and meet the educational needs of children in both foster care and in-home services cases (item 21).

Oklahoma did not achieve substantial conformity with Well-Being Outcome 2. Reviewers determined that the outcome was substantially achieved in 83 percent of the cases reviewed, which is less than the 95 percent or higher required for substantial conformity. The outcome was determined to be substantially achieved in 78 percent of the Comanche County cases, 83 percent of the Oklahoma County cases, and 89 percent of the Muskogee County cases. Also, the outcome was determined to be substantially achieved in 84 percent of the applicable foster care cases compared to 75 percent of the applicable in-home services cases. The State was not in substantial conformity with this outcome in the 2002 CFSR, and it was addressed in the PIP. To address Well-Being Outcome 2, the agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR:

- Increased stability and promoted educational services through replication of foster parenting practices
- Increased coordination with school-based social workers
- Developed a "traveling record" of educational records for foster children

The State met its target goals for this outcome by the end of the PIP implementation period. The 2007 CFSR indicates efforts are being made to improve educational outcomes through improved collaboration with OKDHS and school districts. The 2007 CFSR noted a new program, the Oklahoma Higher Learning Access Program (OHLAP), which will improve access to higher education for youth.

Additional key findings in 2007 for this outcome were the following:

- Some children experience multiple school changes, foster parents do not consistently receive school records, and educational issues are not included in the case plan.

- There was a lack of assessment of educational needs in some instances when there was evidence that the child was experiencing school-related problems and educational needs were identified and noted in the case record, but no services were provided to address those needs.

### **Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs**

This outcome incorporates two indicators that assess the CW agency's efforts to meet children's physical health needs (item 22) and mental health needs (item 23).

Oklahoma did not achieve substantial conformity with Well-Being Outcome 3. The outcome was determined to be substantially achieved in 82.0 percent of the applicable cases, which is less than the 95 percent required for substantial conformity. The outcome was determined to be substantially achieved in 87 percent of Comanche County cases, 85 percent of Oklahoma County cases, and 73 percent of Muskogee County cases. Also, the outcome was determined to be substantially achieved in 88 percent of the applicable foster care cases, compared to 71 percent of the applicable in-home services cases. Oklahoma did not achieve substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP. To address Well-Being Outcome 3, the agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR:

- Increased child and family access to medical, dental, and mental health services by publishing an electronic directory of physical, dental, and mental health resources
- Collaborated with Oklahoma Health Care Authority and Department of Mental Health Services to recruit and support providers
- Implemented an enhancement to the Oklahoma statewide information system (known as KIDS) to ensure physical and mental health findings are recorded for use in treatment planning

The State met its target goals for this outcome by the end of the PIP implementation period. Since the 2002 CFSR, the Fostering Hope Clinic in Oklahoma City has opened to provide children in foster care with a range of services, including medical and mental health services. As indicated in the 2007 CFSR, physical health and dental health screenings occur regularly. The 2007 CFSR also identified the KIDS enhancement for clinic staff to enter medical information as well as Medicaid history, which has improved access to medical records for treatment and assessment. Another strength identified in the 2007 CFSR is that youth in foster care at age 18 remain eligible for Medicaid until age 21, even if they leave care. Providing appropriate and timely mental health services for children remains a challenge for Oklahoma.

## **II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS**

### **Statewide Information System**

Substantial conformity with the systemic factor of a Statewide Information System is determined by whether the State is operating a statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care.

Oklahoma achieved substantial conformity with the systemic factor of a Statewide Information System. Oklahoma was in substantial conformity with this outcome in the 2002 CFSR. Stakeholders noted that KIDS provides information on client demographics and the location and current status of children in foster care. KIDS also generates management reports to track outcome measures and statistical client information.

### **Case Review System**

Five indicators are used to assess the State's performance with regard to the systemic factor of a Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek TPR in accordance with the timeframes established by ASFA (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

Oklahoma is not in substantial conformity with the systemic factor of a Case Review System for 2007. Oklahoma was not in substantial conformity with this factor during the 2002 CFSR and was required to address this factor in its PIP. To address the Case Review System, the agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR:

- The agency implemented individual service plans that included the development of a template in KIDS and training for supervisors on the individual service plan.
- The agency provided judges with a list of due dates for permanency hearings.
- County directors developed strategies to improve their partnership with the courts and district attorney.
- County directors implemented processes to notify foster parents and caregivers of court hearings.

Improvements made in the Case Review System noted in the 2007 CFSR included:

- Oklahoma was found to ensure that periodic reviews of the status of each child in foster care are held at least every 6 months and usually more often. Many stakeholders report reviews are held every 90 days (item 26).

- In addition, permanency hearings are held no later than 6 months from the date the child was placed in out-of-home care and no less frequently than every 6 months thereafter. The permanency hearing can be held concurrently with the required review hearing (item 27).

Despite these areas of strength, the following concerns were noted:

- Although case plans were reported to be developed for all children and many efforts have been implemented in the State to increase engagement of families in the case-planning process, information from stakeholder interviews, the Statewide Assessment, and the onsite case reviews indicates that child and family involvement in case planning remains a challenge for the State (item 25).
- Although policy and State statute require that TPR proceedings be evaluated at each permanency hearing, there are court-related delays in the TPR process and, in some areas of the State, hearings for TPR are not being held if there is no identified adoptive family for a child (item 28).
- Although policy requires that written notice of review and permanency hearings be provided to the pre-adoptive parents, foster parents, and relative caregivers, this is often done informally, and there was confusion among Stakeholders regarding responsibility for giving notice (item 29).

### **Quality Assurance System**

Performance with regard to the systemic factor of a Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30) and whether the State is operating a statewide quality assurance (QA) system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Oklahoma is in substantial conformity with the systemic factor of a Quality Assurance System. The State was in substantial conformity with this factor in its 2002 CFSR. The State has developed and implemented licensing standards and other provisions to ensure the safety and health of children in foster care (item 30). In addition, the State has implemented a QA case review system similar to the Federal CFSR. Reviews are conducted for individual counties, and formal program improvement plans are developed and completed by every county for any outcome areas that are not in substantial conformity. The Quality Assurance System received high praise from most of the stakeholders interviewed during the onsite CFSR (item 31).

### **Training**

The systemic factor of Training incorporates an assessment of the State's new caseworker training program (item 32), ongoing training for CW agency staff (item 33), and training for foster and adoptive parents (item 34).

Oklahoma is in substantial conformity with the systemic factor of Training. The State was in substantial conformity with this systemic factor in its 2002 CFSR. The State was found to have an effective training program for foster and adoptive parents as well as kinship caregivers. The State uses a formal curriculum that was perceived by stakeholders as effective. In addition, ongoing training was noted to be readily available for foster parents, with much of the ongoing training offered as part of local and statewide foster parent meetings. The CFSR also determined that there is sufficient ongoing training available to staff in all areas of the State (item 33). As part of the State's ongoing QA system, the effectiveness of training is continually measured through staff surveys.

### **Service Array**

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services to meet the needs of children and families served by the CW agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? (3) Can services be individualized to meet the unique needs of the children and families served by the CW agency (item 37)?

Oklahoma is not in substantial conformity with the systemic factor of Service Array for the 2007 CFSR. The State was not in substantial conformity with this factor in its 2002 CFSR. The agency implemented the following strategies and action steps in its PIP as a result of the 2002 CFSR to address Service Array:

- Developed, monitored, and implemented county PIPs to increase foster and adoptive home resources
- Identified a resource development specialist for each county
- Participated in a Casey Foundation recruitment demonstration (Breakthrough Series Collaborative)
- Implemented contractual incentives for therapeutic foster care (TFC) recruitment of urban resources
- Revised TFC monthly reports to identify children placed more than 25 miles away and clarified roles for resource coordinators in facilitating TFC placements in close proximity to families
- Surveyed surrounding States for contract incentives or performance-based procedures to influence resource availability
- Sought data to analyze the percentage of TFC children and basic foster care children placed out of a 40-mile radius, developed strategies to impact out-of-area placement, and incorporated these strategies in new contracts for July 2004
- Reviewed and refined the Individual Service Plan
- Developed a resource directory detailing all licensed health, mental health, and dental providers available online through the Continuous Quality Improvement (CQI) website

The general finding of the 2007 CFSR was that, although there are many praiseworthy services available in the State, including CHBS and the Fostering Hope Clinic, and many caseworkers make concerted efforts to access services for the children and families in their caseloads, the array of services is not sufficient to address the needs of children and families served by the CW system (item 35). Key service gaps were noted to be in the areas of behavioral health, substance abuse treatment, and domestic violence services; services for

monolingual Spanish-speaking families; and TFC and respite care. In addition, although services tended to be somewhat available in the major metropolitan areas of the State, many rural areas were without adequate services (item 36). Finally, despite the resourceful and creative efforts of many agency caseworkers to meet the unique needs of children and families, these efforts were not consistently effective because of the scarcity of key services (item 37).

### **Agency Responsiveness to the Community**

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the CFSP (items 38 and 39) and the extent to which the State coordinates CW services with services or benefits of other Federal or Federally-assisted programs serving the same population (item 40).

Oklahoma is in substantial conformity with the factor of Agency Responsiveness to the Community. The State was in substantial conformity with this factor in its 2002 CFSR. The general finding in the 2007 CFSR was that the State includes the input of stakeholders in the development of annual reports of progress and services (item 39). The CFSR found that there was coordination between OKDHS and other Federally-assisted programs to meet the service needs of the children and families served by the agency (item 40).

However, the finding in the 2007 CFSR was that the State does not consistently engage in ongoing consultation with key stakeholders to obtain their input regarding the goals and objectives of the CFSP (item 38). Concerns were raised that the State does not utilize and involve stakeholders on a consistent basis outside of the Statewide Assessment and CFSR. Stakeholders also report that collaboration remains a challenge with the court system.

### **Foster and Adoptive Parent Licensing, Recruitment, and Retention**

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children (item 45).

Oklahoma is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. Oklahoma was in substantial conformity with this factor during the 2002 CFSR. The CFSR found that the State has clear standards for foster family homes and child care institutions, and these standards are implemented in a uniform manner (items 41 and 42). In particular, the same standards are applied to both nonrelative and relative foster homes. In addition, there was clear evidence that the State complies with Federal requirements for criminal background checks (item 43). The CFSR found that OKDHS is very diligent in using cross-jurisdictional resources to locate adoptive or permanent placements for waiting children (item 45).

Concerns were noted with regard to the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in foster care in the State (item 44). The 2007 CFSSR found that, although the State is implementing efforts to enhance recruitment, these efforts are not fully established and there remains a significant need for foster homes and adoptive homes for Hispanic children, Native American children, and older youth.

**Table 1. Oklahoma CFSR Ratings for Safety and Permanency Outcomes and Items**

Outcomes and Indicators	Outcome Ratings			Item Ratings	
	In Substantial Conformity?	Percent Substantially Achieved*	Met National Standards?	Rating**	Percent Strength
<b>Safety Outcome 1:</b> Children are first and foremost, protected from abuse and neglect	NO	67.64	Did not meet 2		
Item 1: Timeliness of investigations				ANI	82
Item 2: Repeat maltreatment				ANI	73
<b>Safety Outcome 2:</b> Children are safely maintained in their homes when possible and appropriate	NO	67.69			
Item 3: Services to prevent removal				ANI	81
Item 4: Risk of harm				ANI	71
<b>Permanency Outcome 1:</b> Children have permanency and stability in their living situations	NO	35.0	Did not meet 4		
Item 5: Foster care re-entry				Strength	100
Item 6: Stability of foster care placements				ANI	68
Item 7: Permanency goal for child				ANI	58
Item 8: Reunification, guardianship, and placement with relatives				ANI	71
Item 9: Adoption				ANI	25
Item 10: Other planned living arrangement				ANI	67
<b>Permanency Outcome 2:</b> The continuity of family relationships and connections is preserved	NO	60.0			
Item 11: Proximity of placement				Strength	97
Item 12: Placement with siblings				ANI	85
Item 13: Visiting with parents and siblings in foster care				ANI	60
Item 14: Preserving connections				ANI	77
Item 15: Relative placement				ANI	71
Item 16: Relationship of child in care with parents				ANI	52

\*95 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for Oklahoma to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI). For an overall rating of Strength, 90 percent of the cases must be rated as a Strength.

**Table 2. Oklahoma CFSR Ratings for Child and Family Well-Being Outcomes and Items**

Outcomes and Indicators	Outcome Ratings		Item Ratings	
	In Substantial Conformity?	Percent Substantially Achieved	Rating**	Percent Strength
<b>Well-Being Outcome 1:</b> Families have enhanced capacity to provide for children’s needs	NO	48.0		
Item 17: Needs/services of child, parents, and foster parents			ANI	51
Item 18: Child/family involvement in case planning			ANI	53
Item 19: Worker visits with child			ANI	80
Item 20: Worker visits with parents			ANI	40
<b>Well-Being Outcome 2:</b> Children receive services to meet their educational needs	NO	86.0		
Item 21: Educational needs of child			ANI	83
<b>Well-Being Outcome 3:</b> Children receive services to meet their physical and mental health needs	NO	82.0		
Item 22: Physical health of child			Strength	91
Item 23: Mental health of child			ANI	78

\*95 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for Oklahoma to be in substantial conformity with the outcome.

\*\*Items may be rated as a Strength or an Area Needing Improvement (ANI). For an overall rating of strength, 90 percent of the cases reviewed for the item (with the exception of item 21) must be rated as a Strength. Because item 21 is the only item for Well-Being Outcome 2, the requirement of a 95 percent strength rating applies.

**Table 3. Oklahoma CFSR Ratings for Systemic Factors and Items**

<b>Systemic Factors and Items</b>	<b>In Substantial Conformity?</b>	<b>Score *</b>	<b>Item Rating**</b>
<b>Statewide Information System</b>	Yes	4	
Item 24: The State is operating a statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care			Strength
<b>Care Review System</b>	No	2	
Item 25: Provides a process that ensures that each child has a written case plan to be developed jointly with the child’s parents that includes the required provisions			ANI
Item 26: Provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review			Strength
Item 27: Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter			Strength
Item 28: Provides a process for TPR proceedings in accordance with the provisions of ASFA			ANI
Item 29: Provides a process for foster parents, pre-adoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child			ANI
<b>Quality Assurance System</b>	Yes	4	
Item 30: The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of children			Strength
Item 31: The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented			Strength
<b>Training</b>	Yes	4	
Item 32: The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under			Strength

<b>Systemic Factors and Items</b>	<b>In Substantial Conformity?</b>	<b>Score *</b>	<b>Item Rating**</b>
titles IV-B and IV-E, and provides initial training for all staff who deliver these services			
Item 33: The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP			Strength
Item 34: The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children			Strength
<b>Service Array</b>	No	2	
Item 35: The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency			ANI
Item 36: The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP			ANI
Item 37: The services in item 35 can be individualized to meet the unique needs of children and families served by the agency			ANI
<b>Agency Responsiveness to the Community</b>	Yes	3	
Item 38: In implementing the provisions of the CFSP, the State engages in ongoing consultation with Tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP			ANI
Item 39: The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP			Strength
Item 40: The State's services under the CFSP are coordinated with services or benefits of other Federal or Federally assisted programs serving the same population			Strength
<b>Foster and Adoptive Parent Licensing, Recruitment, and Retention</b>	Yes	3	
Item 41: The State has implemented standards for foster family homes and child care			

<b>Systemic Factors and Items</b>	<b>In Substantial Conformity?</b>	<b>Score *</b>	<b>Item Rating**</b>
institutions that are reasonably in accord with recommended national standards			Strength
Item 42: The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds			Strength
Item 43: The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case-planning process that includes provisions for addressing the safety of foster care and adoptive placements for children			Strength
Item 44: The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom adoptive homes are needed			ANI
Item 45: The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children			Strength

\*Scores range from 1 to 4. A score of 1 or 2 means that the factor is not in substantial conformity. A score of 3 or 4 means that the factor is in substantial conformity.

\*\*Items may be rated as a Strength or as an Area Needing Improvement (ANI).

**Table 4. Key Oklahoma Case Characteristics**

Case Characteristics	Foster Care Cases N=40	In-Home Cases N=25
<b>When case was opened/child entered foster care</b>		
Open prior to the period under review	29 (73%)	17 (68%)
Open during the period under review	11 (27%)	8 (32%)
Child entered foster care during the period under review	14 (35%)	NA
<b>Child's age at start of period under review</b>		
Not yet born	1 (3%)	*
Younger than age 10	24 (60%)	*
10 but younger than 13	0 (0%)	*
13 but younger than 16	8 (20%)	*
16 and older	7 (18%)	*
<b>Race/Ethnicity</b>		
African-American (Non-Hispanic)	12 (30%)	*
White (Non-Hispanic)	20 (50%)	*
American Indian	1 (3%)	*
Hispanic (of all races)	2 (5%)	*
Two or more races	5 (14%)	*
Unknown		
<b>Primary reason for opening case</b>		
Neglect (not including medical neglect)	17 (43%)	12 (48%)
Physical abuse	4 (10%)	1 (4%)
Sexual abuse	2 (5%)	2 (8%)
Medical neglect	1 (3%)	1 (4%)
Substance abuse by parent	9 (23%)	6 (24%)
Domestic violence in child's home	1 (3%)	2 (8%)
Emotional maltreatment	1 (3%)	0
Abandonment	4 (10%)	0
Child's behavior	0	1 (4%)
Other	1 (3%)	0

\*Information on these characteristics for in-home services cases is not provided because all children in the family are considered in these cases.

**Final Report**  
**Oklahoma Child and Family Services Review**  
**March 2008**

**U.S. Department of Health and Human Services**  
**Administration for Children and Families**  
**Administration on Children, Youth and Families**  
**Children's Bureau**

## **SECTION A: OUTCOMES**

The first section of the report (Section A: Outcomes) presents the CFSR findings relevant to Oklahoma's performance in achieving specified outcomes for children in the areas of safety, permanency, and well-being. For each outcome, there is a table presenting the data for the case review findings and national indicators (when relevant). The table is followed by a discussion of the State's status with regard to substantial conformity with the outcome at the time of the State's first CFSR in 2002, the State's status relevant to the current review, and a presentation and discussion of each item (indicator) assessed under the outcome. Differences in findings across the sites included in the Onsite Review are described when noteworthy. Variations in outcome and item ratings as a function of type of case (i.e., foster care or in-home services) also are identified when appropriate

In the following sections, for each outcome assessed, there is information pertaining to how the State performed on that outcome in the first round. If the outcome was not substantially achieved during the first round of the CFSR, there is a discussion of the key concerns identified at that time and the strategies implemented in the PIP to address those concerns. This discussion also focuses on whether the key concerns that emerged in the first CFSR continued to be present in the second review, or whether those concerns were resolved, but other concerns emerged.

## I. SAFETY

### Safety Outcome 1

<b>Outcome S1: Children are, first and foremost, protected from abuse and neglect</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Substantially Achieved	5	7	11	23	<b>67.64</b>
Partially Achieved	0	2	4	6	<b>17.64</b>
Not Achieved or Addressed	3	1	1	5	<b>14.70</b>
<b>Total Applicable Cases</b>	<b>8</b>	<b>10</b>	<b>16</b>	<b>34</b>	
Not Applicable Cases	9	7	15	31	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	
<b>Conformity of statewide data indicators with national standards</b>					
	<b>National Standard (%)</b>		<b>State's Percentage</b>	<b>Meets Standard</b>	
Absence of maltreatment recurrence	94.6		91.9	NO	
Absence of maltreatment of children in foster care by foster parents or facility staff	99.68		98.8	NO	

### Status of Safety Outcome 1

Oklahoma did not achieve substantial conformity with Safety Outcome 1. The outcome was determined to be substantially achieved in 67.64 percent of the applicable cases, which is less than the 95 percent or higher required for a rating of substantial conformity. There was little variation in performance on Safety Outcome 1 across counties.

Oklahoma also did not meet the national standards for the two data indicators relevant for Safety Outcome 1. These indicators pertain to the absence of maltreatment recurrence and absence of maltreatment of children in foster care by foster parents or facility staff.

### Key Concerns From the 2002 CFSR

Oklahoma was not in substantial conformity with this outcome for its 2002 CFSR and was required to address this outcome in its PIP. During the 2002 CFSR, both of the items included in this outcome were rated as Areas Needing Improvement:

- In 30 percent of the applicable cases, the agency did not respond to a maltreatment report in a timely manner.

- There were inconsistencies in the timeliness of responses to reports assigned to lower priority areas.
- There was a high level of staff turnover among the CW agency's frontline workers, which results in both inexperienced staff and excessive staff caseloads.
- In 18 of the cases in which children experienced a maltreatment report during the period under review, 28 percent had experienced another substantiated or indicated maltreatment report within a 6-month period.
- There were multiple reports over the life of the case for the majority of the 50 cases reviewed. Although not all reports were substantiated or indicated, there were 13 cases (26 percent) that had more than 10 maltreatment reports over the life of the case and 5 (10 percent) with more than 20 reports. Six cases (12 percent) had fewer than three maltreatment reports.

To address these concerns, the agency implemented the following action steps in its PIP to address Safety Outcome 1:

- Reviewed and revised policy and procedures to address (1) the population to be served and (2) criteria for screening investigations and conducting assessments
- Increased consistency of prioritization and response to allegations of maltreatment
- Provided training to all supervisors on screening and safety assessments
- Utilized State CFSR case reviews to focus attention to timeliness of prioritization and response of investigations

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

### **Key Findings of the 2007 CFSR**

Similar to the 2002 CFSR, Item 1: Timeliness of initiating investigations was rated as an Area Needing Improvement in the 2007 CFSR, because investigations of maltreatment reports were initiated in accordance with State policy in 82 percent of the cases, which is less than the 90 percent required for a Strength rating for this item.

In item 2, reviewers looked at whether there had been a substantiated or indicated maltreatment report on the family during the period under review, and if so, whether another substantiated or indicated report involving similar circumstances had occurred within a 6-month period before or after that identified report. In the 2007 CFSR, item 2 was rated as an Area Needing Improvement because this was found to be a Strength in 73 percent of the cases, which is lower than the 90 percent required for a Strength rating. Findings from the 2007 CFSR indicate that OKDHS continues to experience a lack of consistency in screening and assessing risk in cases with circumstances of neglect leading to multiple referrals and repeat maltreatment.

The findings pertaining to the specific items assessed under Safety Outcome 1 are presented below.

**Item 1: Timeliness of initiating investigations of reports of child maltreatment**

Strength       Area Needing Improvement

**Case Review Findings**

The assessment of item 1 was applicable for 34 (52 percent) of the 65 cases. Cases were not applicable when there were no child maltreatment reports during the period under review. In assessing item 1, reviewers were to determine whether the response to a maltreatment report occurring during the period under review had been initiated in accordance with the State CW agency policy requirements.

Oklahoma’s policies with regard to initiating investigations are the following:

- Accepted reports are assigned as either an investigation or an assessment.
- Assessments are conducted when the allegations in the referral do not indicate a serious and immediate threat to the child’s health or safety.
- While guidelines for determining whether a report should be assigned as either an investigation or an assessment have remained the same, policy revisions have been made to improve the procedures for conducting an assessment.

The results of the assessment of this item are presented in the table below.

<b>Item 1</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	5	9	14	28	<b>82</b>
Area Needing Improvement	3	1	2	6	<b>18</b>
<b>Total Applicable Cases</b>	<b>8</b>	<b>10</b>	<b>16</b>	<b>34</b>	
Not applicable	9	7	15	31	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Item 1 was rated as a Strength when the investigation was initiated and face-to-face contact was established with the child within the timeframes required by State policy or law. It was rated as an Area Needing Improvement when face-to-face contact was not established within the required timeframes.

**Rating Determination**

Item 1 was assigned an overall rating of Area Needing Improvement. In 82 percent of the applicable cases, reviewers determined that the agency had initiated an investigation of a maltreatment report in accordance with required timeframes. This percentage does not

meet the 90 percent required for an overall item rating of Strength. Of the 34 applicable cases, 13 had multiple reports during the period under review, and 21 of those reports were Priority I's requiring 24 hour face-to-face contact, and 17 reports were Priority II's requiring that contacts be made within 2–15 days. Of the six cases rated as Area Needing Improvement, all had multiple reports, 7 to 18 reports, during the life of the case. Item 1 was rated as a Strength in the State's 2002 CFSR.

### **Stakeholder Interview Information**

During the onsite CFSR, stakeholders were in general agreement in all counties that OKDHS is effective in initiating investigations of child maltreatment allegations in a timely manner. They reported that Priority I cases in particular are consistently assigned and seen on the same day. In some instances stakeholders cited not having enough staff and having high caseloads as possible reasons for delays with Priority II cases. Stakeholders also reported improvement in the relationship with law enforcement, which has strengthened over time and improved timeliness of investigations. Several stakeholders from the State described QA processes that alert managers and supervisors to issues of timeliness within a particular county, thereby addressing any issues as they occur. Stakeholders also noted that the agency works closely with enforcement agencies and military representatives from Fort Sill in coordinating reports.

Stakeholders reported that individual Tribes handle reports differently, with some having their own child protective services (CPS) unit. Stakeholders noted that when Tribes receive a report from OKDHS, the Tribes do not always receive sufficient information relating to the child in order for the Tribe to take action.

### **Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, there has been an improvement on screening and timely response with the elimination of Priority III's. CW staff now have the ability to focus on children who are at higher risk and to make more timely responses to assigned Priority I and II investigations and assessments. However, the Statewide Assessment reports there are occasional delayed response times to accepted reports of abuse or neglect. The most frequent causes for delayed response times, particularly in the metropolitan areas of the State, are staff turnover, vacancies, and lack of experienced staff. Stakeholders interviewed as part of the Statewide Assessment Team listed barriers to hiring and retaining sufficient staff as low pay and the difficulty in hiring experienced staff or staff with specialized educational backgrounds.

The Statewide Assessment reports that in response to high caseloads, 100 additional CW staff were hired in 2006. A significant number of the new staff were placed in Oklahoma County. The Statewide Assessment describes QA measures used by the agency, which include a report of response timeframes to reports of abuse or neglect, which are monitored through management reports that track whether reports assigned for investigation or assessment are initiated timely. The management reports are reviewed by supervisors, county directors, and area directors, and a report is produced monthly for the OKDHS Commission for Human Services.

## Item 2: Repeat maltreatment

\_\_\_ Strength      X Area Needing Improvement

### Case Review Findings

The assessment of item 2 was applicable for 26 (40 percent) of the 65 cases. Cases were not applicable for item 2 if there was no substantiated or indicated maltreatment report during the period under review. For all applicable cases, reviewers were to determine whether there had been a substantiated or indicated maltreatment report on the family during the period under review, and if so, whether another substantiated or indicated report involving similar circumstances had occurred within a 6-month period before or after that identified report. Information regarding the ratings is provided below.

Item 2	Comanche County	Muskogee County	Oklahoma County	Total Number	Percent
Strength	5	6	8	19	73
Area Needing Improvement	1	3	3	7	27
<b>Total Applicable Cases</b>	<b>6</b>	<b>9</b>	<b>11</b>	<b>26</b>	
Not applicable	11	8	20	39	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

In the 2002 Federal CFSR, 81.7 percent of the cases were rated Strength, compared to 73 percent in this current 2007 review. The State's internal CFSR results show mixed results over time, varying from 94 percent Strength in 2003, 96 percent in 2004, and a drop to 95 percent in 2005, and 94 percent in 2006.

The State's absence of maltreatment is 91.9 percent, which does not meet the national standard of 94.6 percent. The State's current rate of 91.9 percent shows a slight decline in performance since FY 2004 (93.7 percent) and FY 2005 (92.7 percent).

There is some variation in results among the three counties reviewed, with Muskogee County having 67 percent of cases rated as a Strength, compared to Comanche County, which had 83 percent of cases rated as a Strength, and Oklahoma County with 80 percent of cases rated as a Strength.

### Rating Determination

Item 2 was rated as a Strength when there was no indication of two or more substantiated or indicated maltreatment reports on the family within a 6-month period or when there were two or more substantiated reports, but they did not involve the same perpetrator or circumstances. Item 2 was assigned an overall rating of Area Needing Improvement. In 27 percent of the applicable cases, reviewers determined that there was recurrence of maltreatment. In three of the seven cases rated Area Needing Improvement, there were three

or more reports of child maltreatment during a 6-month period. Four of the seven cases rated Area Needing Improvement were in-home cases. In all cases it was noted by reviewers that the reports were made due to similar previous allegations or circumstances of abuse or neglect. In the 2002 CFSR, item 2 was rated as an Area Needing Improvement, and the State did not meet the national standard for recurrence of maltreatment at that time.

### **Stakeholder Interview Information**

During the onsite CFSR, stakeholders' comments varied on item 2 with regard to its performance in preventing maltreatment recurrence. Stakeholders noted that OKDHS has made efforts to prevent repeat maltreatment, including having the University of Oklahoma conduct a study on repeat maltreatment. Additional steps taken by OKDHS included having supervisors review cases where there have been three or more investigations or assessments, conducting mandatory monthly visits with children who are reunified, and providing 6 months of post-re-unification supervision after a child has been reunified with his or her family. Stakeholders noted that cases of neglect and kinship care have a higher recurrence of maltreatment. Stakeholders report that the voluntary nature of in-home cases result in repeat maltreatment when families terminate services prematurely.

### **Statewide Assessment Information**

As indicated in the Statewide Assessment, the policy regarding both investigations and assessments requires an evaluation of the overall family functioning, as well as the safety of all children in the home, to determine the most appropriate services and to prevent future abuse and neglect. All children in the home and all caregivers are interviewed. Whether or not the reported allegations or allegations found during the course of the investigation are confirmed, services for the family can be recommended. When three or more previous investigations/assessments have been conducted on a family and a new report of maltreatment is received, policy requires the supervisor and caseworker to staff the new report, review the history, and evaluate whether a different intervention is needed during the new investigation. In July 2006, policy was revised so that multiple reports concerning the same incident and involving the same children and family are not assigned separately if the first assigned report has not been initiated.

Challenges outlined in the Statewide Assessment:

- Despite training and policy that promoted comprehensive safety assessment, CW staff continue to respond to reports of abuse and neglect as incident based. As a result, in instances involving previous CW agency involvement, the history is not always thoroughly reviewed or considered in determining the current safety or functioning of the family.
- Without court involvement, services to families are voluntary, and the appropriate service may not be accepted by the family.
- Often community services are not recommended or provided unless the circumstances are serious enough to refer for CHBS. Programs developed for lower risk abuse and neglect may not be fully utilized because staff is less apt to address the needs of families with minor to moderate parenting concerns.
- There also may be waiting lists for services in some areas of the State. The length of time between a referral for services and actual receipt of services varies from a few weeks to several months.

## Safety Outcome 2

<b>Safety Outcome S2: Children are safely maintained in their homes whenever possible and appropriate</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Substantially Achieved	13	13	18	44	<b>67.69</b>
Partially Achieved	3	1	5	9	<b>13.84</b>
Not Achieved or Addressed	1	3	8	12	<b>18.46</b>
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

### Status of Safety Outcome 2

Oklahoma did not achieve substantial conformity with Safety Outcome 2. The outcome was determined to be substantially achieved in 67.69 percent of the cases reviewed, which is less than the 95 percent or higher required for a rating of substantial conformity. Performance on Safety Outcome 2 varied across counties. Seventy-six percent of Comanche County cases and Muskogee County cases were substantially achieved in this area, as compared to 58 percent of Oklahoma County cases.

### Key Concerns From the 2002 CFSR

Oklahoma was not in substantial conformity with this outcome during the 2002 CFSR and was required to address the outcome in the agency PIP. Item 3 was assigned an overall rating of Strength because, in 88 percent of the cases, reviewers determined that the agency had made diligent efforts to provide services to ensure children’s safety while preventing their placement in foster care. Item 4 was assigned an overall rating of Area Needing Improvement because in 82 percent of the applicable cases, reviewers determined that OKDHS was effective in its efforts to reduce risk of harm to children.

Key concerns from the 2002 CFSR relevant to this outcome were the following:

- The risk to children was not adequately addressed prior to re-unification, resulting in children being returned to potentially unsafe situations.
- The services being provided were not adequate to effectively reduce risk while children remained in the home, leaving children at the same level of risk as when the case first came to the attention of the agency.
- No efforts were made to reduce risk.
- Training for CW agency staff in engaging families in voluntary services is necessary to ensure children’s safety.

- There was concern that children who need to be removed from their homes to reduce risk are not being removed because the district attorneys do not want to take the case to court.

To address these concerns, the agency implemented the following strategies in its PIP:

- Increased consistency and use of safety assessment protocols, safety, planning, and voluntary service referrals for children in their own homes through revision of policy and risk/safety assessment and safety planning instruments
- Transferred responsibility of voluntary services for families and children and directed additional funds to OCS contractors

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

### **Key Findings of the 2007 CFSR**

In the 2007 CFSR, the State was not in conformity on Safety Outcome 2, with items 3 and 4 being rated as Areas Needing Improvement.

Some key concerns for this outcome include:

- Adequate or appropriate services are not always provided to families and children to reduce risk and prevent removal.
- Children are placed in foster care without providing services to children or families to prevent removal from the home.
- There is a lack of ongoing assessment of the families' needs to address safety issues while the child is in the home.
- Due to workload issues, staff do not take the time needed to refer families for voluntary services, and while community services are available, they are not always recommended or provided unless the circumstances are serious enough for a referral to CHBS.
- There is a lack of consistency in providing sufficient services to children and families to address risk of harm issues.
- Risk of harm was present when children remained in their own homes, and the services necessary to reduce that risk were not provided.
- Safety plans established were not sufficient to address risk.
- There was insufficient ongoing risk assessment in the foster home or relative or fictive kin placement setting.
- Risk of harm was present and not addressed during visitation with parents, particularly trial home visits.

The findings pertaining to the specific items assessed under Safety Outcome 2 are presented below.

### **Item 3: Services to family to protect child(ren) in home and prevent removal**

\_\_\_ Strength  Area Needing Improvement

### Case Review Findings

An assessment of item 3 was applicable in 43 (66 percent) of the 65 cases. For this item, reviewers assessed whether, in responding to a maltreatment report or risk of harm, the agency made diligent efforts to provide services to families to prevent placement of children in foster care while at the same time ensuring their safety. Cases were excluded from this assessment if the children entered foster care prior to the period under review and there were no other children in the home or if there was no substantiated or indicated maltreatment report or identified risk of harm to the children in the home during the period under review. The results of this assessment are shown in the table below.

<b>Item 3</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	10	9	16	35	<b>81</b>
Area Needing Improvement	2	2	4	8	<b>19</b>
<b>Total Applicable Cases</b>	<b>12</b>	<b>11</b>	<b>20</b>	<b>43</b>	
Not applicable	5	6	11	22	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

There was no variation in performance on item 3 between the sites under review. In Comanche County, 83 percent of the cases were rated as a Strength; in Muskogee County, 82 percent of cases were rated as a Strength; and in Oklahoma County, 80 percent were rated as a Strength.

Item 3 was rated as a Strength when reviewers determined the following:

- Services were provided to the parents and child to prevent removal (17 cases).
- The child was placed voluntarily with relatives, and services were provided to the relatives, parents, and children (one case).
- The children were appropriately removed from the home because the removal was necessary to ensure the child’s safety (15 cases).
- Services were provided after the re-unification of the child (two cases).

Case review information indicates that a range of services was offered or provided to families. These included services provided by OKDHS staff and also the following: drug assessment, outpatient substance abuse treatment, home-based community services, financial management services, parenting education, individual and family counseling, psychiatric evaluation, “SoonerStart” program, domestic violence services, day care services, transportation, preventive health services, and financial support.

Item 3 was rated as an Area Needing Improvement when reviewers determined the following:

- No services were provided, and the children remained at risk in the home (three cases).

- Some services were provided, but they did not adequately address the safety issues in the family, and the children remained at risk in the home (two cases).
- The child was placed into foster care without efforts to provide services (two cases).

### **Rating Determination**

Item 3 was assigned an overall rating of Area Needing Improvement. In 81 percent of the cases, reviewers determined that OKDHS had made concerted efforts to maintain children safely in their own homes. This percentage is less than the 90 percent required for a rating of Strength. This item was rated as a Strength in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders' comments on item 3 varied during the onsite CFSR. Some describe the agency staff as effective at assessing the needs of families to prevent removal and others report they are not. Stakeholders listed community resources that are used to prevent removal, such as mental health services, motivational interviewing, providing the parents with parenting resources, and housing assistance. Stakeholders report that Tribes can provide Native American families services in the home to prevent placement, but there is a perception amongst stakeholders that OKDHS does not support families utilizing Tribal services. Stakeholders also indicate that when collaboration works well and OKDHS contacts Tribes in advance, Tribes can provide in-home services to prevent placement and facilitate re-unification. A few stakeholders expressed concern that there often were multiple referrals for child maltreatment before a case is opened for services, particularly with domestic violence and substance abuse cases. As a result, cases sometimes are not opened until the family reaches the point where removal is necessary. Stakeholders also reported that the in-home services provided by CHBS were effective in preventing removal. Stakeholders expressed issues with repeat maltreatment revolving around delay of services due to waiting lists and lack of Spanish-speaking providers with CHBS. Another issue noted in stakeholder interviews was that OKDHS staff are not always present during the initial intake, which results in rescheduling the intake and further delay of services. Stakeholders reported that during the waiting period for in-home services with CHBS, no one within OKDHS is monitoring or visiting the family on a regular basis to assess for risk or provide services. Stakeholders also explained that CHBS cases are voluntary, and without court involvement, families often refuse services, which results in case closure until the next child maltreatment report is received.

Another issue cited by stakeholders is that OKDHS does not have authority to remove a child from its home without a court order. Law enforcement has the authority to remove a child without a court order, and as a result, law enforcement is more likely to remove a child before OKDHS involvement in the larger metropolitan counties. Stakeholders noted that in rural counties, OKDHS is more likely to be involved before the child is removed and will work with law enforcement to identify other options, for example, placement with relatives and services. When children are removed by law enforcement, they are taken to the shelter and, therefore, services cannot be put in place to prevent removal.

### Statewide Assessment Information

According to the Statewide Assessment, upon completion of an assessment or investigation, CW staff discusses the safety and service needs of the child with the family. If the child(ren) can remain safely in the home with services, staff completes a Voluntary Family Service Agreement with the family. The Statewide Assessment reports that the effectiveness of OCS in maintaining children safely in their homes and in preventing re-entry into foster care is evaluated by an independent evaluator with the University of Oklahoma. The case review process and KIDS safety data provide other measures of effectiveness. The CQI unit conducts interviews with CW staff, foster parents, service providers, and judges who rate the service system.

Some challenges described in the Statewide Assessment include high workload demands, which have sometimes prevented staff from taking the time needed to refer families for voluntary services. Feedback from staff indicates that they do not have time to provide ongoing preventive services due to excessive workloads. Rural areas often lack necessary resources to provide services. Another challenge is the tremendous growth in the Hispanic population, which has resulted in Oklahoma not being able to keep up with the demand for Spanish-speaking services.

### Item 4: Risk of harm to child

\_\_\_ Strength  Area Needing Improvement

### Case Review Findings

An assessment of item 4 was applicable for all 65 cases. The results of this assessment are shown in the table below.

Item 4	Comanche County	Muskogee County	Oklahoma County	Total Number	Percent
Strength	14	13	19	46	<b>71</b>
Area Needing Improvement	3	4	12	19	<b>29</b>
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

As shown in the table, performance on this item differed across sites. The item was rated as a Strength in 82 percent of Comanche County cases and 76 percent of Muskogee County cases, as compared with 61 percent of Oklahoma County cases. Item 4 was rated as a Strength in the following events: when reviewers determined that the risk of harm to children was appropriately addressed by the agency through (1) conducting initial and ongoing assessments of risk and safety either in the children’s home or in children’s foster home and (2) addressing all safety-related concerns identified through the assessment.

Item 4 was rated a Strength when reviewers determined the following:

- The risk of harm to children was appropriately managed by removing the children from the home either prior to or during the period under review and providing services to the parents to reduce risk of harm (22 cases).
- The risk of harm to children was appropriately addressed by removing the children from the home either prior to or during the period under review and seeking TPR (five cases).
- The risk of harm to children was appropriately managed by providing services to families to address risk concerns while the children remain in the home (18 cases).

Item 4 was rated as an Area Needing Improvement when reviewers determined the following:

- There was risk of harm to the children when they were in their homes and the services necessary to reduce that risk were not provided, or the safety plan that was established was not sufficient to address the risk (seven cases).
- There was insufficient ongoing risk assessment in the foster home or non-foster care (relative or fictive kin) placement setting (six cases).
- There was risk of harm to the child due to continual running away (one case).
- Risk of harm was present during visitation with parents, particularly trial home visits (five cases).

### **Rating Determination**

Item 4 was assigned an overall rating of Area Needing Improvement. In 71 percent of the applicable cases, reviewers determined that the agency had appropriately addressed the risk of harm to the children. This percentage is less than the 90 percent or higher required for an overall rating of Strength on this item. Item 4 was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholder comments on this item offered conflicting opinions. Several stakeholders suggested that the agency is effective in this area. They noted safety is assessed at the opening of the case; however, there was no report that risk and safety is continually assessed throughout the life of the case or that safety planning is comprehensive or effective. Several stakeholders in Muskogee County report that OKDHS is doing an adequate job assessing risk and safety. Stakeholders report the timeframe in which risk and safety assessments are completed varies from county to county; however, the expectation is that it will be complete within 30 days. Stakeholders describe the use of contractors to provide services to families based on the risk and safety assessments. There is an intake meeting with the service provider and the family, and OKDHS staff is required to attend. However, some stakeholders state that the OKDHS caseworkers do not consistently keep these appointments, resulting in rescheduling and delays in services to the families.

Some stakeholders expressed concerns around safety in foster homes and safety in kinship homes, specifically related to staff turnover, new staff not having adequate history on a case, substance abuse and domestic violence, and parents having unsupervised visits in kinship homes. Other stakeholders suggested that because staff response is incident based and does not always consider the entire family and their history, core risk and safety issues may not be adequately addressed.

### Statewide Assessment Information

According to the Statewide Assessment, completion of a safety assessment is required on every CPS investigation and CPS assessment. Risk factors are identified and determination made as to the level of risk in the home using the Risk Factor Matrix. In circumstances where the risk level is moderate or high, it is required that a safety plan be developed with the family when the plan is for the child to remain in the home.

According to the Statewide Assessment, there are several challenges regarding risk assessment and safety management:

- Lack of knowledge and experience may impact the ability of CW staff to determine the most appropriate services and interventions to keep a child safe and to monitor a safety plan.
- There may be insufficient safety monitoring before families actually receive services. CW staff cite excessive workload as a reason when there has not been sufficient contact with a family while arranging referrals for service.

## II. PERMANENCY

### Permanency Outcome 1

<b>Outcome P1: Children have permanency and stability in their living situations</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Substantially Achieved	3	4	7	14	<b>35.0</b>
Partially Achieved	6	6	11	23	<b>57.5</b>
Not Achieved or Addressed	1	0	2	3	<b>7.5</b>
<b>Total Applicable Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	
Not Applicable Foster Care Cases	0	0	0		
<b>Conformity of statewide data indicators with national standards</b>					
	<b>National Standard (Scaled Score)</b>		<b>State's Composite Score</b>		<b>Meets Standard (Yes/No)</b>
Composite 1: Timeliness and permanency of re-unification	122.6 +		119.8		NO
Composite 2: Timeliness of adoptions	106.4 +		103.8		NO
Composite 3: Permanency for children in foster care for extended time periods	121.7 +		116		NO
Composite 4: Placement stability	101.5 +		74.1		NO

## **Status of Permanency Outcome 1**

Oklahoma did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 35.0 percent of the cases, which is less than the 95 percent required for an overall rating of substantial conformity.
- The State Data Profile indicates that for the CFSR 12-month target period, the State did not meet the national standards for Permanency Composite 1: Timeliness and permanency of re-unification, Permanency Composite 2: Timeliness of Adoptions, Permanency Composite 3: Permanency for children in foster care for extended time periods, and Permanency Composite 4: Placement stability.

The outcome was found to be substantially achieved in 30 percent of Comanche County cases, 40 percent of Muskogee County cases, and 35 percent of Oklahoma County cases.

## **Key Concerns From the 2002 CFSR**

Oklahoma did not achieve conformity with this outcome in the 2002 CFSR. Items 5, 6, 7, and 9 were rated Areas Needing Improvement, while item 8, re-unification, and item 10, OPPLA, were rated as Strengths. Key concerns from the 2002 CFSR relevant to this outcome were the following:

- Children experienced multiple placements, and most placement changes were not intended to promote goal attainment or meet service needs.
- The agency was placing children in emergency shelters without attempting to find more appropriate alternative placements, such as relatives or a foster home.
- There was no indication that caseworkers made efforts to address the needs of foster parents who were experiencing problems with a child in their care in order to prevent placement disruptions.
- Caseworker turnover causes delays in making appropriate changes in goals when a new caseworker is assigned to a case. This is a particular problem with regard to changing a child's goal from re-unification to adoption.
- The goal of re-unification is maintained for too long a period of time without evidence that parents are working on their treatment plans or fully cooperating with the agency.
- Concurrent planning is not being consistently implemented across the State. It was suggested that there is no structure and set of procedures in place to assist or guide caseworkers in the concurrent planning process and that if this were established, the use of concurrent planning might expand.

- Oklahoma statute allows parents to have a jury trial at both the adjudication and at the TPR hearing. This causes significant delays because the dockets for jury trials are generally lengthy. At present, there is pending legislation to eliminate the right to a jury trial at the point of adjudication.
- As a practice of law in an ongoing criminal case, Oklahoma district attorneys may make a decision that requires that the adjudication hearing cannot be held until the criminal case is heard and the outcome is decided.
- Case goals were not being reviewed on an ongoing basis to assess whether they continued to be appropriate for the child. This included not having all parties involved in the development and implementation of the most appropriate permanency goal for the child.
- A barrier to timely adoptions was that parents have a right to a jury trial in both adjudication hearings and TPR hearings.
- Caseworkers do not identify and locate fathers early on in a case so that the father's whereabouts and intentions with respect to the child are known prior to filing for TPR, and there is inconsistency in the efforts made by OKDHS caseworkers to contact and involve fathers early in the case process.

To address these concerns, the agency implemented the following strategies in its PIP:

- Improved re-unification protocol to include risk and safety assessment, provision of services, and monitoring
- Refined contractual expectations and guidance for non-voluntary OCS re-unification services
- Initiated strategies to improve partnerships with local courts and district attorneys to promote permanency
- Established policy timeframes for initial consultation for adoption cases
- Established training for staff on timely TPR and adoption finalization

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

### **Key Findings of the 2007 CFSR**

Similar to the 2002 CFSR, in the State's 2007 CFSR, items 6, 7, and 9 were rated as Areas Needing Improvement. In the 2002 CFSR, item 5 was rated an Area Needing Improvement and is now rated a Strength in the 2007 review. Item 8 and item 10 were found to be Strengths in the 2002 review and are now Areas Needing Improvement in the 2007 review.

Additional findings of the 2007 CFSR case reviews include the following:

- Placement stability continues to be a challenge for the State, with 41 percent of children having two or more placements during the period under review (item 6).
- The agency was not consistent with regard to establishing a child's permanency goal in a timely manner, and the goal of re-unification was maintained for an excessive period of time (item 7).

- The agency was not consistent with regard to attaining the goals of re-unification, permanent placement with relatives, or guardianship in a timely manner (item 8).
- The agency was not consistent with regard to achieving adoptions in a timely manner. Barriers to timely adoptions were both court related (i.e., scheduling, continuances, appeals) and agency related (i.e., delayed TPR filing and requests for court hearings and insufficient efforts to find adoptive homes) (item 9).
- The agency did not make concerted efforts to ensure a long-term placement for the child and provide necessary services to prepare for independent living (item 10).

Key concerns expressed by stakeholders with regard to permanency were the following:

- Foster parents do not receive adequate information about child’s behavioral needs.
- Substance abuse and domestic violence are not adequately addressed before re-unification occurs.
- Children are not being placed initially in the appropriate placements that meet their needs, and there are not enough adoptive homes for the children in foster care.
- Although concurrent planning has been defined in policy, it continues to be an informal process in practice.
- Permanency goals are not consistently changed when they are no longer appropriate.
- The agency does not search for relatives in a timely manner.
- Adoptions are not finalized in a timely manner that is consistent with the needs of children.
- Although independent living services (IL services) have improved since the 2002 CFSR, they are still not sufficient to meet the needs of the older children.

Findings pertaining to the specific items assessed under Permanency Outcome 1 are presented below.

**Item 5: Foster care reentries**

Strength       Area Needing Improvement

**Case Review Findings**

An assessment of item 5 was applicable for 14 (35 percent) of the 40 foster care cases. Cases were not applicable for assessment if the child did not enter foster care during the period under review. In assessing this item, reviewers determined whether the entry into foster care during the period under review occurred within 12 months of discharge from a prior foster care episode. The results of this assessment are presented in the table below.

<b>Item 5</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	3	4	7	14	<b>100</b>
Area Needing Improvement	0	0	0	0	
<b>Total Applicable Foster Care Cases</b>	<b>3</b>	<b>4</b>	<b>7</b>	<b>14</b>	
Not Applicable Foster Care Cases	7	6	13	26	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

State performance for the 12-month CFSR period ending March 31, 2006, on the individual measure of foster care re-entry (Measure C1.4) included in Composite 1: Timeliness and permanency of re-unification was as follows: 9.3 percent of the children exiting foster care reentered foster care in less than 12 months. For the data set used to establish the national standards for the data composites, the median performance on this measure was 15 percent, and the 25th percentile was 9.9 percent. For this measure, lower percentages are associated with higher levels of performance. These data indicate that Oklahoma performed above the median performance for the data used to establish the national standards. This is consistent with the findings of the onsite case reviews. Item 5 was rated as a Strength in 14 cases (100 percent) in which the child's entry into foster care during the period under review did not take place within 12 months of discharge from a prior episode

#### **Rating Determination**

Item 5 was assigned an overall rating of Strength. The item was rated as a Strength in 100 percent of the cases, which exceeds the 90 percent or higher required for a rating of Strength. This item was rated as an Area Needing Improvement in the State's 2002 CFSR.

#### **Stakeholder Interview Information**

Few stakeholders commented on this item during the onsite CFSR. Some stakeholders suggested that the agency is effective in preventing re-entry. Other stakeholders, however, said that the agency does not do enough to prevent multiple entries into foster care, including reunifying prematurely before parents have had a chance to actually practice new skills with the child in the home. Stakeholders also reported in cases involving parental substance abuse and domestic violence that it is difficult to ensure children's safety.

#### **Statewide Assessment Information**

According to the Statewide Assessment, policy provides guidance to CW staff in assessing when the family and child are ready for the child's return home and activities that should occur prior to re-unification in order to more effectively prevent re-entry into foster care. Oklahoma statute and policy require that in most instances, a 6-month period of supervision is required before recommending case closure upon the child's return home. In addition, new policy effective June 2007 requires that prior to closure of the case, CW staff will complete a safety assessment and determine how to ensure continued safety of the children after case closure.

The percentages of children who have not reentered out-of-home care in the last 12 months as evaluated through the State CFSR process resulted in the following: 78 percent in calendar year (CY) 2003, 88 percent in CY 2004, 85 percent in CY2005, and 98 percent in CY 2006. Performance on Web FOCUS reports for Oklahoma indicates a significant increase in performance in Federal fiscal year (FFY) 2004 after the change in the way trial re-unification is documented. The performance improved as follows: 14.9 percent in FFY 2002, 14.1 percent in FFY 2003, 6.1 percent in FFY 2004, 5.4 percent in FFY2005, and 6 percent in FFY 2006.

**Item 6: Stability of foster care placement**

Strength       Area Needing Improvement

**Case Review Findings**

All 40 foster care cases were applicable for an assessment of item 6. In assessing this item, reviewers were to determine whether the child experienced multiple placement settings during the period under review and, if so, whether the changes in placement settings were necessary to achieve the child’s permanency goal or meet the child’s service needs. Reviewers also assessed the stability of the child’s current placement setting. The findings of this assessment are presented in the table below.

<b>Item 6</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	4	8	15	27	<b>68</b>
Area Needing Improvement	6	2	5	13	<b>33</b>
<b>Total Applicable Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	
Not Applicable Foster Care Cases	0	0	0	0	

As shown in the table, performance on this item differed across sites. The item was rated as a Strength in 40 percent of Comanche County cases, compared to 80 percent of Muskogee County cases and 75 percent of Oklahoma County cases.

Oklahoma’s performance for the 12-month CFSR period ending March 31, 2006, was below the national performance standards on all three individual measures of placement stability included in Composite 4: Placement stability, as presented below.

- 68.8 percent of the children in foster care for less than 12 months experienced two or fewer placement settings. The State scored below the national median (83.3 percent) for the data set used to establish the national standards for the data composites.
- 47.6 percent of the children in foster care for at least 12 months but less than 24 months experienced two or fewer placement settings. The State scored below the national median (59.9 percent) for the data set used to establish the national standards for the data composites.
- 26.4 percent of the children in foster care for at least 24 months experienced two or fewer placement settings. The State scored below the national median (33.9 percent) for the data set used to establish the national standards for the data composites.

Item 6 was rated as a Strength when reviewers determined the following:

- The child did not experience a placement change during the period under review, and either the current placement was stable or the child was discharged from foster care during the period under review (24 cases).
- The placement changes experienced were in the child’s best interest and were intended either to achieve the child’s permanency goal or to provide specialized services to the child (four cases).

Item 6 was rated as an Area Needing Improvement when reviewers determined one or both of the following:

- The child was in multiple placement settings during the period under review or placement change was not planned by the agency to achieve the child’s permanency goal (11 cases).
- The child’s current placement setting (at the time of the onsite CFSR) was not stable (two cases).

Additional findings of the case review were the following:

<b>Placement Stability Summary</b>	
<b>Placements During PUR</b>	<b>Number of Children</b>
<b>1 Placement</b>	24 (60%)
<b>2 Placements</b>	9 (23%)
<b>3 or More Placements</b>	7 (18%)
<b>Total Applicable</b>	40

**Rating Determination**

Item 6 was assigned an overall rating of Area Needing Improvement. In 68 percent of the applicable cases, reviewers determined that children experienced placement stability or that changes in placements were in the best interest of the child. This percentage is less than the 90 percent or higher required for a rating of Strength. Item 6 was rated as an Area Needing Improvement in the State’s 2002 CFSR.

**Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR were in general agreement that placement stability for children in foster care could be improved and that it is a significant challenge for Oklahoma. The key concerns noted by stakeholders were the following:

- Children are not being placed in appropriate placements that match their needs at the onset of placement, including the use of shelter care for all children coming into care. This includes shelter care for infants and toddlers in Oklahoma City.

- There is a scarcity of foster families and lack of evaluation of children’s needs.
- Foster parents’ needs are not consistently addressed by the agency and staff is not always available.
- Foster parents do not have sufficient information and support to deal with children with behavior problems.
- OKDHS staff does not always fully disclose information on the child’s behavior to the foster parents.
- Children are placed in foster care while the agency is exploring kinship/relative placement options.

**Statewide Assessment Information**

According to the Statewide Assessment, OKDHS policy and State statute clearly support the stability of placement for children in out-of-home care and they address provisions of the Multiethnic Placement Act of 1994, the Interethnic Adoption Provisions of 1996, and the Indian CW Act (ICWA). The Statewide Assessment reports that policy has been modified since the last Federal CFSR to clarify placement priorities, including search and decision-making regarding noncustodial parents and placement preferences with kin. If a kinship placement is not identified, every effort is made to place a child with a foster family who can best meet the child’s needs and who resides in close proximity to the child’s birth family to support ongoing connections.

The Statewide Assessment reports that data gathered via surveys conducted during FY 2006 and FY 2007 indicate that 95.1 percent of CW staff reported that there are not enough foster home placements, 44.9 percent of CW staff reported they are not able to find placements in close proximity, 69 percent of CW staff reported they are not able to match the child’s characteristics with the foster home placement, and 59 percent of CW staff reported they do not have services available to minimize placement disruptions. According to the Statewide Assessment, 72 percent of foster parents surveyed during focus group meetings state that they believed services are provided to prevent disruptions.

**Item 7: Permanency goal for child**

Strength  Area Needing Improvement

**Case Review Findings**

All 40 foster care cases were applicable for an assessment of item 7. In assessing this item, reviewers were to determine whether the agency had established a permanency goal for the child in a timely manner and whether the most current permanency goal was appropriate. The results of this assessment are shown below.

<b>Item 7</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	6	4	12	22	<b>58</b>
Area Needing Improvement	4	5	7	16	<b>42</b>
<b>Total Applicable Foster Care Cases</b>	<b>10</b>	<b>9</b>	<b>19</b>	<b>38</b>	
Not Applicable Foster Care Cases	0	1	1	2	

Oklahoma did not meet the national standard for Permanency Composite 3: Achieving permanency for children in foster care for extended time periods. The Federal standard in this area is 122.6 or higher. Oklahoma’s score in this area was 116.0. Performance on the individual measures included in this composite was as follows:

- 30.5 percent of the children in foster care for 24 months or longer at the start of the 12-month CFSR target period were discharged from foster care to a permanent home (i.e., adoption, re-unification with parents or other relatives, or guardianship) by the end of the target period. This percentage exceeds the 75th percentile (29.1 percent) for this measure for the data set used to establish the national standards.
- 88.5 percent of the children exiting foster care by March 31, 2006, who were legally free for adoption at the time of exit were discharged to a permanent home. This percentage is less than the national median for this measure (96.8 percent) for the data set used to establish the national standards.
- 48.9 percent of the children who were discharged from foster care during the 12-month target period with a discharge reason of emancipation had been in foster care for 3 years or longer at the time of discharge. This percentage is slightly higher than the national median of 47.8 percent for the data set used to establish the national standards. For this measure, lower scores indicate more positive performance.

These data suggest that Oklahoma’s strength with regard to this data composite relates to the percentage of children in foster care for 24 months or longer on the first day of the 12-month target period that were discharged to a permanent home by the end of the 12-month target period.

Performance on this item varied somewhat across sites based on case review findings. The item was rated as a Strength in 60 percent of Comanche County cases and 63 percent of Oklahoma County cases, as compared to 44 percent of Muskogee County cases. Item 7 was rated as a Strength when reviewers determined that the child’s permanency goal was appropriate and had been established in a timely manner.

The case was rated as an Area Needing Improvement when reviewers determined any of the following:

- The child’s current permanency goal was not appropriate given the case situation and the needs of the child (three cases).
- The child’s permanency goal was not established in a timely manner (six cases).

- The goal of long-term foster care was in place for several years without any effort to explore alternative goals (one case).
- The goals in the case plan are not appropriate because they have not been updated/revised (one case).
- The goal of re-unification was maintained for an excessive period of time (one case).
- TPR was not sought in accordance with ASFA timelines (five cases).

Case review findings pertaining to case goals were as follows:

- Fifteen children had a goal of adoption.
- Six children had a goal of re-unification with parents.
- Five children had a goal of OPPLA.
- Two children had concurrent goals of guardianship and OPPLA.
- One child had concurrent goals of adoption and guardianship.
- Seven children had concurrent goals of re-unification and adoption.
- One child had concurrent goals of re-unification and OPPLA.
- One child had concurrent goals of adoption and OPPLA.

### **Rating Determination**

Item 7 was assigned an overall rating of Area Needing Improvement. In 58 percent of the applicable cases, reviewers determined that the agency had established an appropriate permanency goal for the child in a timely manner. This percentage is less than the 90 percent or higher required for a rating of Strength. This item also was rated as an Area Needing Improvement in the State's 2002 CFSR. Establishing appropriate goals for children in foster care in a timely manner appears to be a greater challenge in Muskogee County than in Comanche or Oklahoma Counties.

### **Stakeholder Interview Information**

Several stakeholders commenting on this item during the onsite CFSR expressed varying opinions regarding OKDHS's effectiveness in identifying appropriate permanency goals in a timely manner. The key concerns noted by stakeholders were the following:

- Permanency goals are not changed when they are no longer appropriate.
- Concurrent planning is sometimes being done, but not always in a formal manner, or when there is a formal concurrent plan, staff are often only "working" one of the goals.
- The agency does not start looking for extended family members early enough in the case, and in general, OKDHS does not do a thorough job with relative searches.
- There are delays in filing TPR when children are in kinship care and parents are allowed to visit frequently; OKDHS sees the situation as stable, so they do not move to TPR.
- The agency is filing TPR in 15 out of 22 months, but it is difficult to get the case on the court docket. Parents have the right to a jury trial, and it can take years for a jury trial to occur.

- OKDHS staff is overworked, and they do not have the time to engage the family and do a thorough assessment that would lead to a well thought out permanency plan.
- Staff turnover has a negative effect on timely permanency planning.
- District attorneys do not file TPR as requested by OKDHS staff.

Despite these concerns, several stakeholders reported that the State is making concerted efforts to improve placement stability and that concurrent planning is being done. The Bridge Project, designed to keep children connected to birth families while moving forward to permanency, was described by several stakeholders as a positive effort by the agency to address permanency issues. Family group and team decision-making is also in the process of being actively utilized to promote permanency.

In terms of working with Tribes, stakeholders describe that collaboration is not consistent. In instances when the agency works together with the Tribe, the permanency plan is achieved. However, other stakeholders report that Tribes are not getting copies of the permanency plan or being given the plan after it has been completed and that Tribes are not part of the process.

**Statewide Assessment Information**

According to the Statewide Assessment, OKDHS requires that a Family/Child Strengths and Needs Assessment be conducted and a permanency plan determined for children no later than 60 days after removal from the home and the permanency plan be updated a minimum of every six months. If the child is removed from the parent(s)’ custody, the court or OKDHS, as applicable, immediately considers concurrent permanency planning to ensure permanency for the child at the earliest opportunity. The percentages where the determination of the appropriate permanency goal was achieved on a timely basis as evaluated through the State CFSR process varied little in the last 4 years: 81 percent in CY 2003, 83 percent in CY 2004, 80 percent in CY 2005, and 83 percent in CY 2006.

The Statewide Assessment reports that permanency field liaisons (PFLs) were hired for each area of the State and are responsible for reviewing the cases of children who have been in out-of-home care for 24 months or longer to ensure that the permanency plan is current and accurate and that progressive casework is occurring toward the achievement of the plan.

The Statewide Assessment indicates reasons for delays, including pending criminal matters, the inclusion of a request for termination within the petition for adjudication, and continuances requested to allow time for attorney preparation.

**Item 8: Re-unification, guardianship, or permanent placement with relatives**

\_\_\_ Strength  Area Needing Improvement

### Case Review Findings

Item 8 was applicable for 17 (43 percent) of the 40 foster care cases. In assessing these cases, reviewers were to determine whether the agency had achieved the permanency goals of re-unification, guardianship, or permanent placement with relatives in a timely manner or, if the goals had not been achieved, reviewers were to determine whether the agency had made, or was in the process of making, diligent efforts to achieve the goals.

The results of this assessment are shown in the table below.

<b>Item 8</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	5	4	3	12	<b>71</b>
Area Needing Improvement	1	0	4	5	<b>29</b>
<b>Total Applicable Foster Care Cases</b>	<b>6</b>	<b>4</b>	<b>7</b>	<b>17</b>	
Not Applicable Foster Care Cases	4	6	13	23	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Oklahoma did not meet the national standard for Permanency Composite 1: Timeliness and permanency of re-unification. Oklahoma's composite score for the CFSR period ending March 31, 2006, was 119.8, and the State did not meet the national standard of 122.6.

Performance on the individual measures included in this composite was as follows:

- 66.3 percent of the re-unifications occurred in less than 12 months of the child's entry into foster care. This percentage is lower than the median of 69.9 percent for State performance on this measure for the data set used to establish the national standards.
- The median length of stay in foster care for children discharged to re-unification was 8.0 months. This length of stay does not meet the national median of 6.5 months for the data set used to establish the national standards for Permanency Composite 1. (Note that a lower number of months means higher performance.)
- 32.2 percent of children entering foster care in the last 6 months prior to the 12-month target period were discharged from foster care to re-unification in less than 12 months of entry into foster care. This percentage is lower than the national median of 39.4 percent for the data set used to establish the national standards.

Performance on the fourth measure included in this composite pertains to foster care re-entry and is provided in the discussion of item 5.

Item 8 was rated as a Strength when reviewers determined that the goal had been achieved in a timely manner or that the agency was making concerted efforts to achieve the goal in a timely manner. Item 8 was rated as an Area Needing Improvement when reviewers determined that the agency had not made diligent efforts to achieve the goal in a timely manner. Performance on this item varied

somewhat across sites based on case review findings. The item was rated as a Strength in 83 percent of Comanche County cases and 100 percent of Muskogee County cases, as compared to 43 percent of Oklahoma County cases. In one case, reviewers noted that services necessary to support the goal of re-unification were not provided. In the three Oklahoma cases, reviewers noted that the child had a goal of guardianship, but there was no evidence of efforts to achieve that goal. In the Comanche County case, the child had been in foster care 164 months, and there was not consistent evidence that diligent efforts were made by the agency to achieve permanency.

### **Rating Determination**

Item 8 was assigned an overall rating of Area Needing Improvement. In 71 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to attain the goals of re-unification, permanent placement with relatives, or guardianship in a timely manner. This percentage is less than the 90 percent or higher required for a rating of Strength. In the State's 2002 CFSR, this item was rated a Strength.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR identified the following barriers to timely re-unification, guardianship, and/or permanent placement with relatives:

- Re-unification as a goal is not always appropriate, yet the goal is not changed.
- Prevalence of substance abuse impedes re-unification timeframes.
- There is a lack of State funds for subsidizing guardianship and clarity over who files for guardianship.
- Agency staff do not work diligently to locate relatives and parents.
- Staff turnover is a barrier to timely permanency.
- Re-unification is hindered due to a lack of documents in Spanish; parents miss court hearings because they cannot read the documents.

### **Statewide Assessment Information**

According to the Statewide Assessment, in most situations, the initial permanency plan is to reunite the child with the family. The Statewide Assessment reports that a primary factor affecting timely and safe re-unification of children is the prevalence of substance abuse as a contributing factor to abuse and/or neglect in a high number of cases. CW staff often report feeling hindered by a lack of effective services available statewide to address substance abuse within families and help facilitate the child's safe return home.

The Statewide Assessment describes CW staff having access to an array of services from private providers in the State in order to facilitate re-unification with family. These services include substance abuse assessment and intervention, family/domestic violence services, individual and family therapy, and parenting skills instruction. Contracted providers offer CHBS, an intensive, short-term service provided in the home, to assist families with the goal of re-unification.

According to the Statewide Assessment, the percentages of children who have exited care to re-unification have increased over time: 68.9 percent in FFY 2002, 63.6 percent in FFY 2003, 67 percent in FFY 2004, and 74.4 percent in FFY 2005. The percentages where helping children in out-of-home care return safely to families was achieved as evaluated through the State CFSR process maintained fairly high scores in the last 4 years: 94 percent in CY 2003, 91 percent in CY 2004, 94 percent in CY 2005, and 92 percent in CY 2006. These scores reflect re-unification, guardianship, and permanent placement with a relative.

**Item 9: Adoption**

\_\_\_ Strength \_\_X\_\_ Area Needing Improvement

**Case Review Findings**

Item 9 was applicable for 14 (35 percent) of the 40 foster care cases. In assessing this item, reviewers were to determine whether diligent efforts had been, or were being, made to achieve finalized adoptions in a timely manner. The results are shown in the table below.

<b>Item 9</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	2	1	3	6	<b>25</b>
Area Needing Improvement	2	6	10	18	<b>75</b>
<b>Total Applicable Foster Care Cases</b>	<b>4</b>	<b>7</b>	<b>13</b>	<b>24</b>	
Not Applicable Foster Care Cases	6	3	7	16	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

The following information describes Oklahoma’s performance on the individual measures included in the CFSR Data Composite 2: Timeliness of adoptions:

- 27.4 percent of the children exiting to adoption were discharged in less than 24 months from the time of entry into foster care. This percentage exceeds the national median (26.8 percent) but is less than the 75th percentile (36.6 percent) for this measure for the data set used to establish the national standards for the composite.
- The median length of stay in foster care for children adopted was 32.2 months. This length of stay is less than the national median (32.4 months) but exceeds the 25th percentile (27.3 months) for this measure for the data set used to establish the national standard for the composite. (Note a lower number of months equates to a higher level of performance.)
- 20.7 percent of children in foster care for 17 months or longer on the first day of the CFSR 12-month target period were discharged to a final adoption by the last day of the target period. This percentage does not meet the 75th percentile (22.7 percent) for this measure for the data set used to establish the national standard for the composite.

- 15.8 percent of children in foster care for 17 months or longer on the first day of the CFSR 12-month target period became legally free for adoption (i.e., there was a TPR for both mother and father) within 6 months. This percentage exceeds the 75th percentile (10.9 percent) for this measure for the data set used to establish the national standard for the composite.
- 47.1 percent of children who were legally free for adoption were adopted within 12 months of becoming legally free. This percentage exceeds the national median (45.8) but is less than the 75th percentile (53.7 percent) for the data set used to establish the national standard for the composite.

Item 9 was rated as a Strength when reviewers determined that the State had made diligent efforts to achieve finalized adoptions in a timely manner. Item 9 was rated as an Area Needing Improvement in 18 cases due to one or more of the following concerns:

- Delays in scheduling court hearings or court delays related to continuances or postponements (one case)
- Delays due to the agency not filing for TPR in a timely manner or not requesting a court hearing for a finalized adoption (eight cases)
- Lack of concerted efforts on the part of the agency to seek an adoptive family for a child (two cases)
- Agency staff's incompleteness of necessary paperwork for adoption (seven cases)
- Delays caused by other legal issues (two cases)
- Goal no longer appropriate and remained adoption (three cases)

Fourteen of the 24 children with a goal of adoption were in foster care for longer than 24 months without achieving permanency. In six cases, the children had been in foster care for longer than 3 years, and in one case, longer than 6 years. In five cases, the adoption was finalized during the period under review. One child was determined to be in a pre-adoptive placement. In one case the concurrent goal of adoption was in place for 14 months and was never addressed in the life of the case.

### **Rating Determination**

Item 9 was assigned a rating of Area Needing Improvement. In 25 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to achieve finalized adoptions in a timely manner. This percentage is less than the 90 percent or higher required for a rating of Strength. This item also was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR expressed differing opinions regarding adoptions and diligent efforts. One of the key barriers described by stakeholders is the length of time it takes once an application for adoption is submitted by the adoptive parents. Stakeholders from the State identified several barriers, including the time it takes to complete the TPR process, prospective adoptive parents not being adequately informed of the child's behavioral issues (thereby causing placement disruption), the need to obtain birth certificates from other States or jurisdictions, and intervention by relatives that slows down the adoption process.

However, stakeholders also noted that there are more children in Oklahoma with a plan of adoption, and 2007 was the State's "best year" in terms of the number of adoptions, with 1,579 adoptive placements in 2007. They report that adding the position of PFL has helped with getting children identified for adoption more quickly. In addition, they report that QA review of cases in foster care 24 months or longer have helped to determine what the problems are and then they can be addressed. One stakeholder commented that in rural counties they are doing a good job searching for relatives to adopt.

### **Statewide Assessment Information**

According to the Statewide Assessment, when a child cannot return safely to his or her own home, adoption is the preferred permanency plan in most cases and is usually possible regardless of the child's age or special needs. Data profile reports indicate that from FFY 2004 to March 31, 2006, OKDHS continues to be at 27 percent for children in foster care who exit to adoption in less than 24 months. State CFSR data have also remained consistent for this item, with 85 percent of cases achieving the item in 2003, 86 percent in 2004, 81 percent in 2005, and 85 percent in 2006. A challenge noted in the Statewide Assessment is that permanency planning staff sometimes wait to change a child's permanency goal to adoption until all parental rights are terminated, and some areas of the State struggle with the length of time it takes to get TPR for both parents.

The Statewide Assessment notes that improvements have been made in achieving adoptions in a timely manner and describes several factors that the State feels contributed to this improvement:

- In 2005, six new positions were created across the State to serve as PFLs in each of the areas. The main focus of these positions is to review cases of children in out-of-home care over 12 months to ensure that all necessary work is being done in order to achieve permanency.
- The Statewide Automated CW Information System (SACWIS) system allows staff to utilize reports to guide the workflow, and in FY 2007, there was a 10 percent increase in adoption workers due to the growing number of children with the goal of adoption.
- OKDHS continues to enhance and expand the Statewide Recruitment and Retention Committee for foster and adoptive resources. There is a diverse group of team members representing the children waiting in the OKDHS system.
- The "Waiting Child" television segment has a 20+ year history of providing a public service to promote children waiting for adoption. This year "Waiting Child" has added a website and video feed for individuals who are not located in the viewing area but who are interested in learning about children available for adoption.
- OKDHS also utilizes the "Heart Gallery" photo exhibit and the AdoptUsKids Internet site to assist in identifying potential adoptive families.
- Tribal partners assist OKDHS in identifying Tribal homes for Tribal children waiting for adoption.
- Heritage Family Services is the contracted agency that processes all Interstate Compact on the Placement of Children (ICPC) adoptive home requests outside of the State of Oklahoma.

- Oklahoma Health Care Authority is the State Medicaid agency and has partnered with OKDHS to provide a detailed list of medical and psychological services provided to the children while in custody, which greatly expedites the preparation of the medical and social histories, which is required for full disclosure to potential adoptive families.

**Item 10: Permanency goal of OPPLA**

\_\_\_ Strength X Area Needing Improvement

**Case Review Findings**

Item 10 was applicable for 9 (23 percent) of the 40 foster care cases. In assessing these cases, reviewers were to determine if the agency had made, or was making, diligent efforts to assist children in attaining their goals related to OPPLA. The results are presented in the table below.

<b>Item 10</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	3	0	3	6	<b>67</b>
Area Needing Improvement	1	1	1	3	<b>33</b>
<b>Total Applicable Foster Care Cases</b>	<b>4</b>	<b>1</b>	<b>4</b>	<b>9</b>	
Not Applicable Foster Care Case	6	9	16	31	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Item 10 was rated as a Strength when reviewers determined that the agency had made concerted efforts to ensure a long-term placement for the child and to provide the necessary service to prepare the child for independent living.

Item 10 was rated as a Strength when reviewers determined the following:

- Child was receiving the necessary services and supports to promote a successful transition from foster care to independent living once the child reaches the age of emancipation (five cases)
- Child was in a group home placement and made a successful transition to independent living (one case)

Item 10 was rated as an Area Needing Improvement in two cases because the agency was not providing the child with IL services to assist in transitioning to independent living, even though it was in the case plan. In the third case, the child was not in a long-term placement and the current placement was unstable.

**Rating Determination**

Item 10 was assigned an overall rating of Area Needing Improvement. In 67 percent of the applicable cases, reviewers determined that

the goal of OPPLA was being addressed in an appropriate way. This percentage is less than the 90 percent or higher required for a rating of Strength. The item was rated as a Strength in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Several stakeholders noted that independent living (IL) services are more available in the State, and they have improved over the past year. Stakeholders' comments are not consistent with case review findings during the CFSR.

Strengths noted by stakeholders include:

- There are increasing resources, including resolved Medicaid issues, tuition waivers, and housing for youth in the IL program.
- The IL program offers easy to access services and responds to requests for needed items.
- There are wraparound services for youth funded from the Youth Development Funds.
- Eighty-four IL coordinators were hired for 77 counties.
- The Ansell Casey Lifeskills Assessment is used to determine what services are needed for youth to prepare for independent living.
- IL transitional case plans include education, employment, permanent connections, mental and/or physical health, and information on housing.
- There are services for youth after they leave foster care, in particular the "Yes I Can" Network that provides toll-free access to youth development funds and case management.
- Exit interviews with youth are used to modify protocols and policies.
- A tutoring initiative through the Oklahoma Higher Access Learning Program (OLAP) is available to pay for tutoring and tuition to a State university or college.

### **Statewide Assessment Information**

According to the Statewide Assessment, OKDHS policy allows for planned alternative permanent placement to be considered for a child when staff document a compelling reason for the court to determine that return home, placement for adoption, or guardianship is not in the child's best interests, and (1) all other permanency plans have been explored and are not feasible or in the child's best interests, or (2) the child chooses not to be adopted after adoption has been thoroughly explored, explained, and the opportunities demonstrated.

An internal Oklahoma SACWIS report reflects that on March 1, 2007, there were 1,055 youth 16 years of age or older eligible for IL services and 682 had completed life skills assessments for a total of 65 percent with assessments. The number of youth who are accessing youth development funds and the "Yes I Can" Network for aftercare services continue to increase. The number of youth attending college is also increasing. Four hundred and eighteen youth have started college since 2003.

## Permanency Outcome 2

<b>Outcome P2: The continuity of family relationships and connections is preserved for children</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Substantially Achieved	6	6	12	24	<b>60</b>
Partially Achieved	4	4	7	15	<b>38</b>
Not Achieved	0	0	1	1	<b>3</b>
<b>Total Applicable Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	
Not Applicable Foster Care Cases	0	0	0	0	

### Status of Permanency Outcome 2

Oklahoma did not achieve substantial conformity with Permanency Outcome 2. The outcome was rated as substantially achieved in 60 percent of the cases, which is less than the 95 percent or higher required for substantial conformity. Performance on this outcome did not vary across sites. The outcome was determined to be substantially achieved in 60 percent of Comanche, Muskogee, and Oklahoma County cases.

### Key Concerns From the 2002 CFSR

Oklahoma did not achieve substantial conformity with this outcome in its 2002 CFSR. In the 2002 CFSR, items 11,12, 13, and 16 were rated as Strengths, and items 14 (preserving connections) and 15 (relative placement) were rated as Areas Needing Improvement. Key concerns identified in the 2002 review relevant to Permanency Outcome 2 were the following:

- Non-Native American children’s connections to family, community, culture, faith, and friends had not been preserved while the child was in foster care.
- In several instances the agency had made no efforts to explore the possibility of relative placements.
- The agency had conducted only a limited exploration of potential relative placements, such as exploring maternal relatives but not paternal relatives for several cases.

To address these concerns, the agency implemented the following strategies in its PIP:

- Improved connections and relationships for children through increased involvement of relatives, especially fathers and paternal relatives, and Tribes
- Developed and improved diligent search capacity and procedures to promote and improve family and Tribal connections for children

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

### **Key Findings From the 2007 CFSR**

The 2007 CFSR found that there continues to be a lack of consistency with preserving connections, particularly with the child's extended family. Consequently item 15, relative placement, was rated as an Area Needing Improvement; the agency did not make diligent efforts to search for maternal or paternal relatives. Item 13 was not identified as a concern in the CFSR 2002, yet reviewers identified the concern that the agency did not make concerted efforts to promote visitation with parents and siblings in foster care.

The primary concerns identified in the 2007 CFSR were the following:

- A lack of children placed with siblings (item 12)
- A lack of consistency in promoting visitation between or among siblings in foster care (item 13)
- A lack of consistency with regard to efforts to maintain and strengthen the parent-child relationship while children are in foster care (item 16)

Despite these concerns, the case reviewers found the following strength:

- Children were routinely and consistently placed in close proximity to parents or potential permanent caregivers (item 11).

The findings pertaining to the specific items assessed under Permanency Outcome 2 are presented and discussed below.

### **Item 11: Proximity of foster care placement**

Strength                       Area Needing Improvement

#### **Case Review Findings**

Item 11 was applicable for 30 (75 percent) of the 40 foster care cases. Cases determined to be not applicable were those in which (1) TPR had been attained prior to the period under review, (2) contact with parents was not considered to be in the child's best interest, and/or (3) parents were deceased or whereabouts were unknown. In assessing item 11, reviewers were to determine whether the child's most current foster care setting was in close proximity to the child's parents or close relatives. The results of this assessment are presented in the table below:

<b>Item 11</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	6	8	15	29	<b>97</b>
Area Needing Improvement	0	0	1	1	<b>3</b>
<b>Total Applicable Foster Care Cases</b>	<b>6</b>	<b>8</b>	<b>16</b>	<b>30</b>	
Not Applicable Foster Care Cases	0	0	0	0	
<b>Total Foster Care Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>30</b>	

Item 11 was rated as a Strength when reviewers determined the child was placed in the same community or county as parents or relatives; the child’s placement was not in the same community or county as parents or relatives, but the placement was necessary to meet the child’s needs; or the child’s placement was not in the same community or county as parents or relatives but was in close proximity to them. In one instance the child’s proximity was considered to be inadequate to facilitate a relationship with her father.

**Rating Determination**

Item 11 was assigned an overall rating of Strength. In 97 percent of the cases, reviewers determined that OKDHS had made diligent efforts to ensure that children were placed in foster care placements that were in close proximity to their parents or relatives or that were necessary to meet special needs.

This percentage exceeds the 90 percent required for a rating of Strength. This item also was rated as a Strength in the State’s 2002 CFSR.

**Stakeholder Interview Information**

Several stakeholders expressed the opinion that OKDHS makes efforts to place children in their own communities, and kinship placement helps support this item. Barriers to placing children in their own communities include lack of placements in general.

**Statewide Assessment Information**

According to the Statewide Assessment, it is Oklahoma’s policy that every effort is made to place a child with a foster family who can best meet the child’s needs and who resides in close proximity to the child’s birth family to support ongoing connections. The Statewide Assessment reports that locating appropriate placements for children in out-of-home care continues as a significant challenge throughout the State. Surveys completed by CW staff during FY 2006 and FY 2007 indicate that many staff see placement unavailability as problematic: 95.1 percent (n=476) of workers reported that there are not a sufficient number of foster homes in their county to meet placement demands, 44.9 percent (n=437) of workers reported that they are unable to find placements for children in close proximity, and 35.8 percent (n=53) of Tribal caseworkers report that they were unable to find placement for Tribal children in close proximity.

**Item 12: Placement with siblings**

\_\_\_ Strength  Area Needing Improvement

**Case Review Findings**

Item 12 was applicable for 31 (78 percent) of the 40 foster care cases. Cases were not applicable if the child did not have a sibling in foster care at any time during the period under review. In assessing item 12, reviewers were to determine whether siblings were, or had been, placed together and, if not, whether the separation was necessary to meet the needs (service or safety needs) of one or more of the children. The results of this assessment are presented in the table below:

<b>Item 12</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	7	4	11	22	<b>85</b>
Area Needing Improvement	1	0	3	4	<b>15</b>
<b>Total Applicable Foster Care Cases</b>	<b>8</b>	<b>4</b>	<b>14</b>	<b>26</b>	
Not Applicable Foster Care Cases	2	6	6	14	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Item 12 was rated as a Strength when reviewers determined that the child was placed with all siblings, or if siblings were separated, the separation was due to the special needs of one of the siblings or to the fact that placement with siblings was not in the child’s best interest.

Item 12 was rated as a Strength when reviewers determined the following:

- The child was in a placement with all siblings (13 cases).
- The child was in a placement with some siblings, and the separation from other siblings was determined to be in the best interests of one of the siblings (two cases).
- The child was not placed with any siblings, but the siblings were separated due to the special needs of one of the siblings (seven cases).
- The child was not placed with siblings because the size of the sibling group made it difficult to place children together; the target child and one other sibling were placed together and three siblings were placed together (one case).

Item 12 was rated as an Area Needing Improvement when reviewers determined the following:

- Children were not placed with siblings and the separation was not deemed to be in the best interests of the one of the siblings (two cases).

- There was a shortage of placements for sibling groups (one case).
- There was not sufficient inquiry into the potential of placing the siblings together (one case).
- There were not sufficient efforts to locate a placement for a sibling group (four cases).

### **Rating Determination**

Item 12 was assigned an overall rating of Area Needing Improvement. In 85 percent of the applicable cases, reviewers determined that the agency placed siblings together in foster care whenever possible and appropriate.

This is less than the 90 percent or higher required for a rating of Strength. This item was rated as a Strength in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Several stakeholders expressed the opinion that OKDHS makes concerted efforts to place siblings together. Stakeholders reported that because therapeutic foster homes can be approved as both therapeutic and regular foster homes, this supports siblings staying together in instances when they require different levels of care. Stakeholders also reported success with siblings being placed together with kinship providers. Stakeholders indicated that there are quarterly foster care meetings statewide that help staff look at how to keep siblings together (e.g., If a bed becomes available in a home, can the county move a sibling into the home?). However, stakeholders also noted that there are not enough foster family homes to ensure that siblings remain together, particularly if there is a large sibling group or a sibling who has a significant need.

### **Statewide Assessment Information**

According to the Statewide Assessment, OKDHS policy requires that every reasonable attempt to place siblings together is made, unless there is documented evidence that such a placement is not in the children's best interest. If siblings are separated, contact and visitation is required. However, the Statewide Assessment reports that the lack of resources available for sibling groups impacts this practice. This frequently results in the separation of at least one sibling from the others. Over the past 4 years, the State CFSR process has determined that siblings were placed together, or there was a justified reason for separation as follows: 95 percent in 2003, 89 percent in 2004, 92 percent in 2005, and 91 percent in 2006.

As part of the Statewide Assessment, surveys were completed throughout 2006 and 2007 with youth in OKDHS custody who were surveyed. As part of the survey, participants were asked if they were able to visit with their siblings when they wanted to. Of the youth who participated in this particular question (n=127), 65 percent responded "yes," 20 percent responded "no," and 15 percent responded "sometimes."

Strengths outlined in the Statewide Assessment include:

- OKDHS has designated a staff member to track sibling placements, including the number and percentage of siblings who are all placed together. When sibling separation occurs, they communicate with field staff to remind them of the need to place siblings together and offer assistance.
- Diligent search training has been developed and is available to help caseworkers locate relatives who may be able to provide a home for siblings. The training reiterates the importance of siblings being together and outlines the benefits to the children, their family, and to the caseworker.
- There is a resource recruitment and retention committee that meets each month and works to develop ideas and tools to recruit more resource homes for sibling groups.

**Item 13: Visiting with parents and siblings in foster care**

\_\_\_ Strength  Area Needing Improvement

**Case Review Findings**

Item 13 was applicable for 37 (93 percent) of the 40 foster care cases. Cases were not applicable for an assessment of this item if the child had no siblings in foster care and if one of the following conditions was met with regard to the parents: (1) TPR was established prior to the period under review and parents were no longer involved in the child’s life (or parents were deceased), or (2) visitation with a parent was considered not to be in the best interests of the child. In assessing this item, reviewers were to determine (1) whether the agency had made, or was making, diligent efforts to facilitate visitation between children in foster care and their parents and siblings in foster care and (2) whether these visits occurred with sufficient frequency to meet the needs of children and parents. The findings of this assessment are presented in the table below:

<b>Item 13</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	7	4	10	21	<b>60</b>
Area Needing Improvement	2	4	8	14	<b>40</b>
<b>Total Applicable Foster Care Cases</b>	<b>9</b>	<b>8</b>	<b>18</b>	<b>35</b>	
Not Applicable Foster Care Cases	1	2	2	5	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Performance on this item varied slightly across sites. The item was rated as a Strength in 78 percent of Comanche County cases, as compared to 50 percent of Muskogee County cases and 55 percent of Oklahoma County cases.

Item 13 was rated as a Strength when reviewers determined that the frequency and quality of visitation with parents and siblings met the needs of the children or when visitation did not meet the child's needs, but the agency made concerted efforts to promote visitation. Item 13 was rated as a Strength when reviewers determined the following:

- The frequency of visitation met the needs of the child (16 cases).
- The frequency of visitation did not meet the needs of the child, but the agency had made concerted efforts to promote more frequent visitation (two cases).
- The frequency of visitation did not meet the child's needs despite agency efforts, and the agency provided alternative forms of contact, such as telephone or e-mail (two cases).
- Visitation was not in the child's best interest, but the agency made efforts to make it work (one case).

Item 13 was rated as an Area Needing Improvement when reviewers determined one or more of the following:

- The agency did not make concerted efforts to promote visitation with the mother (eight cases).
- The agency did not make concerted efforts to promote visitation with siblings (five cases).
- The agency did not make concerted efforts to promote visitation with the father (five cases).

### **Rating Determination**

Item 13 was assigned an overall rating of Area Needing Improvement. In 60 percent of the applicable cases, reviewers determined that the agency made concerted efforts to ensure that visitation was of sufficient frequency to meet the needs of the family. This percentage is less than the 90 percent required for a rating of Strength. This item was rated a Strength in the 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR expressed differing opinions regarding OKDHS making concerted efforts to ensure frequent visitation of children in foster care with their parents when re-unification is the goal. Stakeholders from the State expressed concern that visitation is not started soon enough after removal and that visits are not often enough to expedite re-unification efforts. Stakeholders report that Tribes could help supervise visits, but OKDHS does not notify Tribes in a timely manner. Caseload size, logistical issues, and inexperienced staff are also noted as barriers to ensuring visits with parents and siblings. Several stakeholders from Muskogee County commented that visits are not frequent enough. Stakeholders in Oklahoma County report that the quality of sibling visits is not addressed, and parents are confused about their rights and visitation.

Stakeholders noted that the Bridge Home Project engages foster parents and helps to improve the amount of contact between children in foster care and their parents/siblings. They also report that visits do occur if children are in the same county as their parents and siblings.

### Statewide Assessment Information

According to the Statewide Assessment, family visitation begins no later than two weeks after the child’s removal and is arranged a minimum of every four weeks thereafter until the child is returned or the permanency plan is no longer re-unification. Policy specifies that frequent visitation should occur between children and their parents and that visitation is a right. Exceptions are made only when the parent(s) fails to cooperate with visitation arrangements; the court orders no visitation; whereabouts of the parent(s) are unknown; or visitation, even supervised, endangers or submits the child to highly damaging psychological stress. Face-to-face, phone, letter, or email contact among all siblings is arranged a minimum of once every 4 weeks until the siblings are reunited in out-of-home placement or the permanency plan is achieved.

The Statewide Assessment revealed many occasions in which family visitation had been limited to monthly supervised contacts as a result of workload constraints rather than family need. Oklahoma continues to struggle regarding this measure in regard to visitation with parents. The percentages where visitation was achieved as evaluated through the State CFSR process varied in the last 4 years: 72 percent in CY 2003, 77 percent in CY 2004, 68 percent in CY 2005, and 75 percent in CY 2006. Achievement is greater with mothers as compared to fathers: 91 percent vs. 64 percent in CY 2003, 91 percent vs. 75 percent in CY 2004, 88 percent vs. 61 percent in CY 2005, and 93 percent vs. 71 percent in CY 2006.

### Item 14: Preserving connections

\_\_\_ Strength \_\_X\_\_ Area Needing Improvement

### Case Review Findings

Item 14 was applicable for 39 (98 percent) of the 40 foster care cases. In assessing item 14, reviewers were to determine whether the agency had made, or was making, diligent efforts to preserve the child’s connections to neighborhood, community, heritage, extended family, faith, and friends while the child was in foster care. This item is not rated on the basis of visits or contacts with parents or siblings in foster care. The results of the assessment are provided in the table below.

Item 14	Comanche County	Muskogee County	Oklahoma County	Total Number	Percent
Strength	8	9	13	30	77
Area Needing Improvement	2	1	6	9	23
<b>Total Applicable Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>19</b>	<b>39</b>	
Not Applicable Foster Care Cases	0	0	1	1	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Performance on this item varied slightly across sites. The item was rated as a Strength in 80 percent of Comanche County cases, 90 percent of Muskogee County cases, and 68 percent of Oklahoma County cases.

Item 14 was rated as a Strength when reviewers determined one or more of the following:

- The agency made concerted efforts to preserve the child's connections with extended family members (e.g., through phone contact and visits) (25 cases).
- The agency made concerted efforts to preserve the child's connections with the child's religious or cultural heritage (six cases).
- The agency made concerted efforts to preserve the child's connections with the school and community (e.g., selecting placements that do not require a change of school, jobs, friends) (11 cases).
- The agency made concerted efforts to explore connections, but none were found (one case).

Item 14 was rated as an Area Needing Improvement when reviewers determined one or more of the following:

- The agency did not make concerted efforts to maintain the child's connections to extended family (five cases).
- The agency did not make concerted efforts to preserve the child's connections with the child's religious or cultural heritage (two cases).
- The agency did not explore child's connections (two cases).

### **Rating Determination**

Item 14 was rated as an Area Needing Improvement. In 77 percent of the cases, reviewers determined that the agency had made concerted efforts to maintain the child's connections with extended family, culture, religion, community, and school. This is less than the 90 percent required for a rating of Strength. This item was rated as an Area Needing Improvement in Oklahoma's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR report that while efforts are made to keep children connected with extended family, culture, religion, community, and school, this is not consistently occurring, especially when children are placed outside of their communities. Stakeholders in Oklahoma County noted that there is a need for more culturally competent services, particularly with Hispanic, Vietnamese, Native American and African-American families. They also described having difficulty engaging foster parents in helping to maintain important connections and that often children have to be placed in a different school district.

Stakeholder comments varied in terms of OKDHS inquiring about Indian heritage. In Oklahoma County, several stakeholders report that they are getting initial notification regarding children in custody; however, there is concern that new caseworkers do not understand the Tribal role and the specifics of ICWA requirements. Stakeholders also report inconsistencies in terms of OKDHS notification to Tribes. When Tribes do receive notice, it is often not enough information to determine the child's eligibility for enrollment. When Tribes request more information, they generally do not get a response back from OKDHS. In Muskogee and

Comanche Counties, several stakeholders report that the agency does a good job notifying Tribes and attempts to place children appropriately within the ICWA guidelines.

Stakeholders from the State described a project that recruits families to help maintain connections, including people who have been involved in the child's life such as teachers. Stakeholders described an emphasis on maintaining connections in the practice standards that are being incorporated throughout the State.

### **Statewide Assessment Information**

According to the Statewide Assessment, every effort is made to place the child within his or her own community, school district, or both in order to minimize the disruption for the child and ensure consistency with education. When a child is in emergency or temporary OKDHS custody, the caseworker evaluates requests for visitation or contact from relatives or extended family members based on information from the child's parent(s) and the significance of the relationship to the child's well-being.

The Statewide Assessment reports that when a child is identified in the SACWIS system as a member of a specific Native American Tribe, this child's information is accessible to the applicable Tribe through the external interface. In preparation for the Statewide Assessment, a focus group meeting was held with Tribal caseworkers. Of the 66 participants, 21 reported that they currently use the program, and several indicated they would like to have access; however, they cannot as they do not have secure Internet access through their agency.

The Statewide Assessment reports that the percentages in which preservation of connections was achieved as evaluated through the State CFSR process varied little in the last 4 years: 90 percent in CY 2003, 91 percent in CY 2004, 91 percent in CY 2005, and 90 percent in CY 2006. The component that impacted the measure was whether the needs of Native American children were being addressed by notifying and coordinating with the Tribe as required by statute and giving preference to placement in the order prescribed by the Tribe pursuant to a Tribal/State agreement. However, improvement has been observed in this component as evidenced by the following percentages of achievement: 84 percent in CY 2003, 89 percent in CY 2004, 93 percent in CY 2005, and 94 percent in CY 2006.

Some promising practices described in the Statewide Assessment include:

- Oklahoma County has created a Family Group Conferencing unit. This unit focused on cases after removal of children and placement in foster care. The unit does plan to assess how to begin Family Group Conferencing before a removal. A large 16 county area of the State has also implemented this approach.
- Training has been provided to supervisors on "family finding" for youth who are likely to age out in foster care. Family finding engages youth and families in a process of diligent search to locate important connections.

**Item 15: Relative placement**

\_\_\_ Strength X Area Needing Improvement

**Case Review Findings**

Item 15 was applicable for 35 (88 percent) of the 40 foster care cases. Cases were not applicable if relative placement was not an option during the period under review because (1) the child was in an adoptive placement at the start of the time period, or (2) the child entered foster care needing specialized services that could not be provided in a relative placement. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to locate and assess relatives (both maternal and paternal relatives) as potential placement resources for children in foster care. The results of this assessment are presented in the table below.

<b>Item 15</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	5	8	12	25	<b>71</b>
Area Needing Improvement	3	1	6	10	<b>29</b>
<b>Total Applicable Foster Care Cases</b>	<b>8</b>	<b>9</b>	<b>18</b>	<b>35</b>	
Not Applicable Foster Care Case	2	1	2	5	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Performance on this measure varied somewhat across sites. Sixty-three percent of the cases in Comanche County were rated as a Strength for this item, compared to 89 percent of Muskogee County cases and 63 percent of Oklahoma County cases.

Item 15 was rated as a Strength when reviewers determined the following:

- The child was placed with relatives (17 cases).
- The child was not placed with relatives, but the agency made diligent efforts to search for both maternal and paternal relatives (eight cases).

Item 15 was rated as an Area Needing Improvement when reviewers determined the following:

- The agency had not made diligent efforts to search for either maternal or paternal relatives during the period under review (five cases).
- The agency had made efforts to search for maternal relatives, but not paternal relatives (two cases).
- The agency had made efforts to search for paternal relatives, but not maternal relatives (one case).
- The agency located relatives but made no efforts to place the child with them (two cases).

### **Rating Determination**

Item 15 was assigned an overall rating of Area Needing Improvement. In 71 percent of cases, reviewers determined that the agency had made diligent efforts to locate and assess relatives as potential placement resources. This percentage is less than the 90 percent or higher required for a rating of Strength. This item was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Most stakeholders commenting on this item during the onsite CFSR expressed the opinion that the agency has made improvements with making concerted efforts to search for relatives, in particular paternal relatives, and they are evaluating relatives as placement resources for the child. Several also report that searches begin immediately, and they have streamlined the diligent search process, thereby making it more effective.

### **Statewide Assessment Information**

According to the Statewide Assessment, OKDHS kinship policy considers kinship care as the first option in providing care for children who require out-of-home placement, provided the child's needs are met and safety is reasonably assured in the kinship placement. Kinship placement is assessed as a potential permanent placement for the child as a component of concurrent planning. All kinship foster homes, paid or nonpaid, must meet the same requirements as all other CW foster homes.

Some challenges outlined in the Statewide Assessment include:

- Judges ordering specific placements that may not always include relatives or kin
- Caseworkers neglecting to document their efforts to locate relatives or kin and relatives who have made contact with the agency

The percentages where relative placement was achieved as evaluated through the State CFSR process varied in the last 4 years: 81 percent in CY 2003, 83 percent in CY 2004, 78 percent in CY 2005, and 81 percent in CY 2006. These results do not indicate a marked improvement in achievement of this item; however, 63 percent of all children in foster care are currently in kinship (relative or nonrelative) and Tribal placements.

### **Item 16: Relationship of child in foster care with parents**

\_\_\_ Strength  Area Needing Improvement

### **Case Review Findings**

Item 16 was applicable for 29 (73 percent) of the 40 foster care cases. In Oklahoma, several cases were not applicable for this item because the child was in foster care on a 48-hour hold and, therefore, issues pertaining to maintaining the bond between children and

parents while the child is in foster care were not relevant. Other cases were not applicable if (1) parental rights had been terminated prior to the period under review and parents were no longer involved with the child, or (2) a relationship with the parents was considered not to be in the child’s best interests throughout the period under review. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to support or maintain the bond between children in foster care and their mothers and fathers through efforts other than arranging visitation. The results of this assessment are provided in the table below:

<b>Item 16</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	6	2	7	15	<b>52</b>
Area Needing Improvement	1	6	7	14	<b>48</b>
<b>Total Applicable Foster Care Cases</b>	<b>7</b>	<b>8</b>	<b>14</b>	<b>29</b>	
Not Applicable Foster Care Cases	3	2	6	11	
<b>Total Foster Care Cases</b>	<b>10</b>	<b>10</b>	<b>20</b>	<b>40</b>	

Performance on this measure varied somewhat across sites. Eighty-six percent of the cases in Comanche County were rated as a Strength for this item, compared to 25 percent of Muskogee County cases and 50 percent of Oklahoma County cases.

Item 16 was rated as a Strength when reviewers determined that the agency made concerted efforts to support and/or strengthen the bond between parents and children through one or more of the following activities:

- Encouraging the parents’ participation in school or afterschool activities and attendance at medical appointments and special events (10 cases)
- Providing transportation so that parents can participate in these events (five cases)
- Providing opportunities for family therapeutic situations (five cases)
- Encouraging foster parents to mentor biological parents and serve as parenting role models for them (five cases)
- Encouraging parents’ participation in parenting classes to enhance parent child interaction and bonding (one case)
- Encouraging other types of contact with the parent (one case)

Item 16 was rated as an Area Needing Improvement when reviewers determined the following:

- The agency did not make concerted efforts to support the relationship with the father (four cases).
- The agency did not make concerted efforts to support the relationship with the mother (six cases).
- The agency did not make concerted efforts to support positive relationships with the mother or father (three cases).
- The agency did not make concerted efforts to support relationships with parent figure (one case). (Parents were deceased and maternal grandmother assumed the role of parent.)

**Rating Determination**

Item 16 was assigned an overall rating of Area Needing Improvement. In 52 percent of the cases, reviewers determined that the agency had made concerted efforts to support the parent-child relationships of children in foster care. This percentage is less than the 90 percent or higher required for a rating of Strength. This item also was rated as a Strength in the State's 2002 CFSR.

**Stakeholder Interview Information**

Stakeholders expressed concern that diligent search is not always done on fathers or the fathers aren't notified or involved until late in the case. As a result, this creates barriers to timely termination and/or adoption. Stakeholders also describe a lack of engagement of noncustodial parents, usually fathers.

The Fostering Hope clinic encourages parental involvement for medical care when both foster and biological parents are collaborating for the child's needs. This has resulted in some foster parents continuing with the Fostering Hope clinic after the child leaves the shelter and some biological parents continuing to receive their child's care through the clinic after re-unification.

**Statewide Assessment Information**

According to the Statewide Assessment, the Family/Child Strengths and Needs Assessment is the initial and most important step in the permanency planning process and builds upon the information obtained during the assessment or investigation of the report of abuse and neglect. Assessment is an ongoing process and as information is gathered, it is added to the assessment document, which results in a list of all the child's needs. The Statewide Assessment reports that visitation is implemented in every case unless an exception applies. However, other methods of contact, including mail, telephone, and e-mail, are utilized sporadically. If a child is in a kinship placement, the amount of contact and visitation increases and there is less structure to the requirements around contact when safety allows. However, the Statewide Assessment also reports that lack of efforts to provide visitation and other forms of contact with incarcerated and noncustodial parents continues to be an issue.

The percentages where relationship of child in foster care with parents was achieved as evaluated through the State CFSR were 85 percent in CY 2003, 86 percent in CY 2004, 78 percent in CY 2005, and 81 percent in CY 2006. A possible contributing factor for this trend is that the State's scoring of this item may have become more critical over time, as expectations for evidence of parent-child relationship increased.

### III. CHILD AND FAMILY WELL-BEING

#### Well-Being Outcome 1

<b>Outcome WB1: Families have enhanced capacity to provide for their children’s needs</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total</b>	<b>Percent</b>
Substantially Achieved	10	5	16	31	<b>48</b>
Partially Achieved	4	8	12	24	<b>37</b>
Not Achieved or Addressed	3	4	3	10	<b>15</b>
<b>Total Applicable Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

#### Status of Well-Being Outcome 1

Oklahoma did not achieve substantial conformity with Well-Being Outcome 1. The outcome was rated as substantially achieved in 48 percent of the cases reviewed, which is less than the 95 percent required for a determination of substantial conformity. Performance on this outcome varied across sites. The outcome was determined to be substantially achieved in 59 percent of Comanche County cases and 52 percent in Oklahoma County cases, compared to 29 percent in Muskogee County. Performance did vary based on the type of case. The outcome was found to be substantially achieved in 58 percent (23 cases) of the 40 foster care cases, compared to 32 percent (8 cases) of the 25 in-home services cases.

#### Key Concerns From the 2002 CFSR

Oklahoma did not achieve substantial conformity with this outcome during its 2002 CFSR. For the 2002 CFSR, all four items incorporated in the outcome were rated as Areas Needing Improvement.

Some key concerns identified in the 2002 review were the following:

##### Item 17 Areas Needing Improvement

- The needs and services of children, parents, and/or foster parents had not been, or were not being, adequately addressed by OKDHS. The primary concern identified by reviewers, however, was that OKDHS is not being consistent in providing fathers with adequate attention with respect to their services needs.

##### Item 18 Areas Needing Improvement

- There was a lack of consistency among OKDHS caseworkers with regard to involving families in developing case plans.
- Case plans were developed for families without their input and then presented to the families for signature.

- Children were not involved, although reviewers determined that they were old enough to have been involved.

Item 19 Areas Needing Improvement

- Problems with visitation occurred as a result of caseworker turnover and increased caseload demands.
- Reviewers determined that caseworker visits with children were not sufficiently frequent or did not sufficiently address the child's safety and well-being.

Item 20 Areas Needing Improvement

- The lack of visitation was attributed to excessive caseloads or a case that was not fully assigned to a new caseworker because of caseworker turnover.
- Reviewers determined that visits were not sufficiently frequent to meet the needs of parents and children or did not focus on substantive issues pertaining to the case.

To address these concerns, the agency implemented the following strategies in its PIP:

- Increased involvement of relatives, especially fathers, paternal relatives, and Tribes
- Developed and implemented a diligent search capacity to locate relatives, especially fathers
- Simplified Individual Service Plan to focus on identification, assessment, and meeting needs of families
- Developed and introduced contact guides for use in the field by staff
- Implemented State CFSR case reviews

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

**Key Findings of the 2007 CFSR**

Despite efforts of the PIP, in the 2007 CFSR, all of the items included under Well-Being Outcome 1 were rated as Areas Needing Improvement as they were in the 2002 CFSR. However, some of the concerns identified during the 2002 CFSR were not noted during the 2007 review, suggesting that the issues identified in 2002 may have been resolved.

The findings pertaining to the specific items assessed under Well-Being Outcome 1 are presented and discussed below.

**Item 17: Needs and services of child, parents, and foster parents**

\_\_\_ Strength \_\_X\_\_ Area Needing Improvement

### Case Review Findings

Item 17 was applicable for all 65 cases. In assessing this item, reviewers were to determine whether the agency had (1) adequately assessed the needs of children, parents, and foster parents and (2) provided the services necessary to meet those needs. This item excludes the assessment of children’s (but not parents’) needs pertaining to educational, physical health, and mental health needs. These are addressed in later items. The case review results were the following:

<b>Item 17</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total Number</b>	<b>Percent</b>
Strength	11	6	16	33	<b>51</b>
Area Needing Improvement	6	11	15	32	<b>49</b>
Not applicable	0	0	0	0	0
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Performance on this item did vary somewhat across sites. The item was rated as a Strength in 65 percent of Comanche County cases and 52 percent of Oklahoma County cases, compared to only 35 percent in Muskogee County cases. The item was rated as a Strength in 58 percent (23 cases) of the 40 foster care cases compared to 40 percent (10 cases) of the 25 in-home services cases.

Item 17 was rated as a Strength when reviewers determined that the needs of children, parents, and foster parents had been adequately assessed and that identified service needs had been met. Item 17 was rated as an Area Needing Improvement when reviewers determined that there was either inadequate assessment of needs or inadequate services to meet identified needs.

Specific case review findings for item 17 are shown in the table below. The data in the table suggest that the agency is less effective in in-home cases with assessing and meeting service needs for fathers than it is for children and mothers. In terms of foster care, the data suggest that the agency is more effective with children and foster parents than with mothers’ and fathers’ needs.

<b>Item 17: In-Home Services Summary</b>			
<b>Needs Assessment and Services Evaluations</b>	<b>Yes</b>	<b>No</b>	<b>Number of Applicable Cases</b>
Child’s needs assessed and met	21 (84%)	4 (16%)	25
Mother’s needs assessed and met	18 (72%)	7 (28%)	25
Father’s needs assessed and met	8 (38%)	13 (62%)	21

<b>Item 17: Foster Care Summary</b>			
<b>Needs Assessment and Services Evaluations</b>	<b>Yes</b>	<b>No</b>	<b>Number of Applicable Cases</b>
Child's needs assessed and met	35 (88%)	5 (12%)	40
Mother's needs assessed and met	16 (64%)	9 (36%)	25
Father's needs assessed and met	14 (67%)	7 (33%)	21
Foster parent's needs assessed and met	31 (91%)	3 (9%)	34

### **Rating Determination**

Item 17 was assigned an overall rating of Area Needing Improvement. In 51 percent of the cases, reviewers determined that the State had adequately assessed and addressed the service needs of children and parents. This percentage is less than the 90 percent or higher required for a rating of Strength. This item also was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders across the sites were of mixed opinion regarding the effectiveness of the State in assessing and meeting service needs for parents, children, and foster parents. Stakeholders from the State describe a variety of assessments that are completed in the first 30 days that are designed to determine the needs of the parents. Stakeholders report that the agency has developed a 2-day assessment training and a booklet called the "Art of Assessment" aimed at helping staff better assess family's needs. In addition, stakeholders describe being able to tailor services to meet the needs of the family and being able to access \$600 in discretionary funds.

Stakeholders noted that the Bridge program, the CHBS program, and the system of care have had a positive impact in terms of assessing and addressing the needs of children, parents, and foster families. Families receiving services from SoonerStart and the Care Center (Child Advocacy Center) also report these services as having a positive impact on them. In terms of identifying the needs of children, stakeholders in Oklahoma County report that while contact guides do help them to collect some important information about the child, staff does not have a tool that assesses the ongoing needs of children. There is a common theme between sites that there is a lack of ongoing assessments of children, parents, and foster parents throughout the life of the case. The skill level of the caseworker often dictates the frequency of ongoing assessments for children and families.

Although stakeholders identified some effective practices in this regard, they also identified inhibiting factors. For example, there was some agreement amongst stakeholders that there are waiting lists for many services and that assessing needs continues to be a struggle for staff. High staff turnover and staff skills in doing needs assessment were cited as concerns by stakeholders. In addition, stakeholders indicated that foster parents are of mixed opinions about the adequacy of the services available to them. While a few report that foster parents receive adequate assistance, others report that foster parents are not asked what they need and that respite care is not offered to foster families. In addition, staff hired to work with foster parents are sometimes overburdened, and they do not consistently respond to the needs of foster parents.

**Statewide Assessment Information**

According to the Statewide Assessment, the caseworker and family develop the initial Individualized Service Plan (ISP) with participation or input from the placement provider, child’s attorney, Tribe, and guardian *ad litem* (GAL), if applicable. An age-appropriate child, regardless of legal status, participates, if feasible. Oklahoma has a process referred to as the Permanency Planning Review (PPR). This is a case specific multidisciplinary team and may include the child, if appropriate, and the child’s birth parent(s), caseworker and supervisor, adoption specialist, foster or adoptive parent, GAL, attorney, service providers, court-appointed special advocate (CASA), post-adjudication review board (PARB) member, Tribal representative, and district attorney.

However, the Statewide Assessment reports that the quality of assessments continues to be a concern. Many CW staff complete an assessment with the custodial parent; however, the noncustodial parent’s assessment is often not completed. The data from the Statewide Assessment on item 17 show that the percentage of families that have enhanced capacity to provide for their children’s needs as evaluated through the State CFSR process has decreased over the last 4 years: 86 percent in CY 2003, 84 percent in CY 2004, 74 percent in CY 2005, and 79 percent in CY 2006. The CFSR scores related to assessing and meeting foster parent needs indicate a strength, with this question scoring 94 percent in CY 2003, 93 percent in CY 2004, 95 percent in CY 2005, and 96 percent in CY 2006.

**Item 18. Child and family involvement in case planning**

Strength       Area Needing Improvement

**Case Review Findings**

Item 18 was applicable for 59 (91 percent) of the 65 cases. A case was not applicable if parental rights had been terminated prior to the period under review, parents were not involved with the child in any way, and the child was too young or had cognitive delays or other conditions that were barriers to participation in case planning. In assessing this item, reviewers were to determine whether parents and children (when age appropriate) had been involved in the case-planning process, and if not, whether their involvement was contrary to the child's best interest. A determination of involvement in case planning required that a parent or child had actively participated in identifying the services and goals included in the case plan. This assessment produced the following findings:

<b>Item 18</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total N</b>	<b>Percent</b>
Strength	10	4	17	31	<b>53</b>
Area Needing Improvement	6	10	12	28	<b>47</b>
<b>Total Applicable Cases</b>	<b>16</b>	<b>14</b>	<b>29</b>	<b>59</b>	
Not Applicable Cases	1	3	2	6	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Performance on this item varied across sites. The item was rated as a Strength in 63 percent of Comanche County cases, 59 percent of Oklahoma County cases, and 29 percent of Muskogee County cases. Performance did vary substantively based on the type of case. The item was rated as a Strength in 68 percent (21 cases) of the applicable foster care cases and 32 percent (10 cases) of the in-home services cases.

Item 18 was rated as a Strength when reviewers determined that all appropriate parties had actively participated in the case-planning process or that the agency had made concerted efforts to involve them in the case-planning process.

Key findings with regard to this item were the following:

- There were 32 cases in which involvement of the mothers in the case-planning process was applicable for assessment. Reviewers determined that the agency made concerted efforts to involve mothers in case planning in 21 (66 percent) of these cases.
- There were 37 cases in which involvement of the fathers in the case-planning process was applicable for assessment. Reviewers determined that the agency made concerted efforts to involve fathers in case planning in 15 (41 percent) of these cases.
- There were 26 cases in which involvement of the children in the case-planning process was applicable for assessment. Reviewers determined that the agency made concerted efforts to involve children in case planning in 16 (62 percent) of these cases.

The item was rated as an Area Needing Improvement when reviewers determined that the agency had not made concerted efforts to involve the mother, father, and/or child (when age appropriate) in the case-planning process. Key findings with regard to this item were the following:

- Of the cases in which involvement of the mothers in the case-planning process was applicable for assessment, reviewers determined that the agency did not make concerted efforts to involve mothers in case planning in 11 (44 percent) of these cases.
- Of the cases in which involvement of the fathers in the case-planning process was applicable for assessment, reviewers determined that the agency did not make concerted efforts to involve fathers in case planning in 22 (59 percent) of these cases.
- Of the cases in which involvement of the children in the case-planning process was applicable for assessment, reviewers determined that the agency did not make concerted efforts to involve children in case planning in 10 (38 percent) of these cases.

### **Rating Determination**

Item 18 was assigned an overall rating of Area Needing Improvement. In 53 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to involve parents and/or children in the case-planning process. This is less than the 90 percent or higher required for a rating of Strength. This item was rated as an Area Needing Improvement in the 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR expressed the opinion that involving parents and children in case planning has improved when Family Group Decision-Making and Team Decision-Making are used; however, this practice is relatively new, and it is not yet being used with all families. The consensus from stakeholders is that parents and children are often not

engaged or involved in case planning. Stakeholders also indicated that Family Group Decision-Making is on a request only basis and not implemented in every case. The extent of engagement of parents and children in case planning varies depending on the skills of the individual caseworkers and staff carrying high caseloads. When families receive services from CHBS, only the parties identified on the referral receive case planning services. The practice eliminates other members involved with the family or child in case planning, including noncustodial parents.

### Statewide Assessment Information

According to the Statewide Assessment, input into case planning is usually obtained from the parent; however, formalized involvement of the child, placement provider, child’s attorney, Tribe, and GAL (when applicable) may not always be occurring. Informal involvement often occurs at different stages in the process. The Statewide Assessment reports that more effort is needed to engage noncustodial parents in the case-planning process, and staff have difficulty in determining how to involve incarcerated parents.

Information in the Statewide Assessment reports the percentages where family and child involvement in case planning was achieved varied in the last 4 years: 73 percent in CY 2003, 75 percent in CY 2004, 67 percent in CY 2005, and 74 percent in CY 2006. Achievement continues to be greater with mothers as compared to fathers; 92 percent vs. 69 percent in CY 2003, 91 percent vs. 71 percent in CY 2004, 85 percent vs. 65 percent in CY 2005, and 92 percent vs. 74 percent in CY 2006. However, greater success was achieved in the involvement of children. The percentages of achievement were as follows: 94 percent in CY 2003, 93 percent in CY 2004, 95 percent in CY 2005, and 94 percent in CY 2006.

### Item 19. Worker visits with child

Strength       Area Needing Improvement

### Case Review Findings

Item 19 was applicable for all 65 cases. In conducting the assessment of this item, reviewers were to determine whether the frequency of visits between the caseworkers and children was sufficient to ensure adequate monitoring of the child's safety and well-being and whether visits focused on issues pertinent to case planning, service delivery, and goal attainment. The results of the assessment are presented in the table below:

Item 19	Comanche County	Muskogee County	Oklahoma County	Total N	Percent
Strength	13	12	27	52	<b>80</b>
Area Needing Improvement	4	5	4	13	<b>20</b>
Not applicable	0	0	0	0	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Performance on this item varied slightly across sites. The item was rated as a Strength in 76 percent of Comanche County cases, 71 percent of Muskogee County cases, and 87 percent of Oklahoma County cases. Performance on the item did vary substantially based on the type of case. The item was rated as a Strength in 69 percent (36 cases) of the 40 foster care cases and 31 percent (16 cases) of the 25 in-home services cases.

Item 19 was rated as a Strength when reviewers determined that the frequency and quality of visits between caseworkers and children were sufficient to ensure adequate monitoring of the child's safety and well-being and to promote attainment of case goals.

Item 19 was rated as an Area Needing Improvement when reviewers determined the following:

- The frequency of caseworker visits was not sufficient to meet the needs of the child, and the visits did not focus on issues pertinent to case planning, service delivery, and goal attainment (one case).
- The frequency of caseworker visits was sufficient, but the visits did not focus on issues pertinent to case planning, service delivery, and goal attainment (eight cases). Specifically, safety was a concern in five of these cases.
- There were long periods of time in which the agency caseworker did not visit the child (four cases).

<b>Item 19 Summary</b>			
<b>Visitation Pattern</b>	<b>Foster Care</b>	<b>In-home Services</b>	<b>Total</b>
More than once a week	2 (5%)	1 (4%)	3 (5%)
Once a week	1 (3%)	9 (36%)	10 (15%)
Less than once a week, but at least twice a month	8 (20%)	4 (16%)	12 (18%)
Less than twice a month, but at least once a month	27 (68%)	9 (36%)	36 (55%)
Less than once a month	1 (3%)	2 (8%)	3 (5%)
Never	1 (3%)	0	1 (2%)
<b>Total</b>	<b>40</b>	<b>25</b>	<b>65</b>

### **Rating Determination**

Item 19 was assigned an overall rating of Area Needing Improvement. In 80 percent of the cases, reviewers determined that caseworker visits with children were of sufficient frequency and/or quality. This is less than the 90 percent or higher required for a rating of Strength. This item was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

According to stakeholders, contact between DHS caseworkers and the children in their caseloads occurs every 30 days, if not more frequently. Several stakeholders mentioned that frequency of visits is monitored by administrators, and several units have reached 100 percent contact rates. For the most part, stakeholders describe the quality of the visits as good. Although, several stakeholders also indicated that both the frequency and quality of caseworker contacts with children tend to vary across caseworkers and counties in the State. The key barriers to more frequent and high quality caseworker contacts with children were noted to be high caseloads and high staff turnover at DHS.

### **Statewide Assessment Information**

According to the Statewide Assessment, policy requires a caseworker to have no less than monthly contact with no more than 31 days between contacts with children in foster care. There are contact exceptions for children who are returned home and are being provided with CHBS through a contracted provider, in a Developmental Disabilities Services Division (DDSD) placement with a DDSD worker, and in an Office of Juvenile Affairs (OJA) placement with an OJA worker. Those contacts are reduced to quarterly. When children are placed outside the county of jurisdiction, either a secondary caseworker, or a combination of the primary caseworker and the secondary caseworker or facility liaison meets contact requirements. A child who is placed in an out-of-State mental health facility is visited by a caseworker from Oklahoma every 6 months. Children who are placed through ICPC are visited by the assigned caseworker in the State where the child is placed, and the Oklahoma caseworker is provided with quarterly reports by the assigned caseworker in the placement State.

The Statewide Assessment reports that, in general, children are having contact with CW staff on a monthly basis. However, there appears to be a prevalent use of paraprofessionals providing the child contact rather than the caseworker responsible for the child. Due to caseload size, contact in excess of one time per month is not a standard practice, and children may not be receiving the needed amount of contact. In addition, when children are not placed in their home communities, the time the workers take traveling to their location takes away from time that could be spent with the children.

Data from the State CFSR process varied little over the last 4 years: 89 percent in CY 2003, 84 percent in CY 2004, 89 percent in CY 2005, and 88 percent in CY 2006. Monthly reports from the SACWIS system based on data entry from staff are higher and range between a low of 87.5 percent and a high of 95.92 percent between February 2006 and January 2007.

### **Item 20. Worker visits with parents**

Strength       Area Needing Improvement

### Case Review Findings

Item 20 was applicable for 53 (82 percent) of the 65 cases. Cases were not applicable for this assessment if parental rights had been terminated prior to the period under review, and parents were no longer involved in the lives of the children. All cases that were not applicable were foster care cases. Reviewers were to assess whether the caseworker's face-to-face contact with the children's mothers and fathers was of sufficient frequency and quality to promote attainment of case goals and/or ensure the children's safety and well-being.

The results of this assessment are presented in the table below:

<b>Item 20</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total N</b>	<b>Percent</b>
Strength	7	2	12	21	<b>40</b>
Area Needing Improvement	6	12	14	32	<b>60</b>
<b>Total Applicable Cases</b>	<b>13</b>	<b>14</b>	<b>26</b>	<b>53</b>	
Not Applicable Cases	4	3	5	12	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Performance on this item varied across sites. The item was rated as a Strength in 54 percent of Comanche County cases, 46 percent of Oklahoma County cases, and 14 percent of Muskogee County cases. There was little variation based on the type of case. The item was rated as a Strength in 43 percent (12 cases) of the 28 applicable foster care cases and 36 percent (9 cases) of the 25 in-home services cases.

Item 20 was rated as a Strength when reviewers determined that visits occurred with sufficient frequency to meet the needs of parents and children, and visits focused on issues pertinent to case planning, service delivery, and goal attainment.

Item 20 was rated as an Area Needing Improvement when reviewers determined one or more of the following:

- Visits with the mother were not of sufficient frequency or quality (13 cases).
- Visits with the mother were not of sufficient frequency, although when they did occur they were of sufficient quality (one case).
- Visits with the mother were of sufficient frequency, but not quality (three cases).
- Visits with the father were not of sufficient frequency or quality (eight cases).
- Visits with the father were of sufficient frequency, but not quality (two cases).
- There were no visits with the father (11 cases).

### **Rating Determination**

Item 20 was assigned an overall rating of Area Needing Improvement. In 40 percent of the applicable cases, reviewers determined that the frequency and/or quality of caseworker visits with parents were sufficient to monitor the safety and well-being of the child or promote attainment of case goals. This is less than the 90 percent or higher required for a rating of Strength. This item also was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR reported that caseworkers generally do not meet requirements for conducting visits with parents. In Muskogee County, stakeholders report that it is the parent's responsibility to stay in contact with the agency, and visits do not occur on a monthly basis. Stakeholders at the State-level report that staff are not always clear who they have the right to speak to in the home. Stakeholders also report that noncustodial parents are not being visited. Stakeholders in Oklahoma County report that the quality of visits with parents is not comparable with the quality of the visits with the children. Stakeholders indicate that visits conducted outside of the home are not quality visits with the parent. The visits often focus only on the child and are held at court hearings, the office, or parks. This practice does not promote frequency or quality of visits between caseworkers and parents to ensure safety, permanency, and well-being.

### **Statewide Assessment Information**

According to the Statewide Assessment, the caseworker has face-to-face contact with the parent(s) of the child within the first 2 weeks of the child's removal and a minimum of once every calendar month thereafter, with no more than 31 days between contacts. When there is an open CHBS case and children are in their own home, the caseworker's contact is quarterly, and the CHBS worker visits weekly with the family. However, the caseworker is required to have monthly contact with the CHBS service provider to monitor the family's progress.

Barriers cited in the Statewide Assessment include:

- Contact is more likely to occur for a parent with whom the child is expected to be reunified.
- There is not a QA review of contacts with parents, only with children.
- Large caseloads are cited by CW staff as a barrier for regular contacts between the staff and parents.
- In some instances, staff fail to document the parent contacts in SACWIS.
- Staff belief that the parent is responsible for initiating the contact rather than the caseworker.
- Contact with incarcerated parents is a barrier.

The Statewide Assessment reports the percentages of worker visits with parents as evaluated through the State CFSR process: 63 percent in CY 2003, 66 percent in CY 2004, 60 percent in CY 2005, and 62 percent in CY 2006. Achievement continues to be greater with mothers as compared to fathers: 83 percent vs. 67 percent in CY 2003, 81 percent vs. 75 percent in CY 2004, 80 percent vs. 68 percent in CY 2005, and 81 percent vs. 68 percent in CY 2006.

## Well-Being Outcome 2

<b>Outcome WB2: Children receive appropriate services to meet their educational needs.</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement:</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total</b>	<b>Percent</b>
Substantially Achieved	7	8	15	30	<b>83</b>
Partially Achieved	0	1	1	2	<b>6</b>
Not achieved	2	0	2	4	<b>11</b>
<b>Total Applicable Cases</b>	<b>9</b>	<b>9</b>	<b>18</b>	<b>36</b>	
Not Applicable Cases	8	8	13	29	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

### Status of Well-Being Outcome 2

Oklahoma did not achieve substantial conformity with Well-Being Outcome 2. Reviewers determined that 83 percent of the cases reviewed substantially achieved this outcome. This is less than the 95 percent or higher required for substantial conformity. There were slight differences in performance on this outcome across sites. The outcome was determined to be substantially achieved in 78 percent of the Comanche County cases, 89 percent of the Muskogee County cases, and 83 percent of the Oklahoma County cases. The outcome was determined to be substantially achieved in 84 percent of the applicable foster care cases and 75 percent of the applicable in-home services cases.

### Key Concerns of the 2002 CFSR

The State was not in substantial conformity with this outcome in the 2002 CFSR. Key concerns identified during the 2002 CFSR were the following:

- There were children who experienced multiple school changes.
- There were foster parents who did not receive school records from the agency.
- There were educational needs of children that were identified, but not addressed.
- There were educational assessments that were not completed in a timely manner.
- The schools were not always cooperative with the agency and, therefore, the educational needs of children in foster care were not consistently met.

To address these concerns, the agency implemented the following strategies in their PIP:

- Increased stability and promoted educational services through replicating foster parenting practices
- Increased coordination with school-based caseworkers
- Developed a “traveling record” of educational records for foster children

Oklahoma met its target goals for this outcome before the end of the PIP implementation period.

### **Key Findings of the 2007 CFSR**

As indicated in the discussion for item 21 below, the findings of the 2007 CFSR suggest that some of the concerns found in the 2002 CFSR are similar to those found in the 2007 CFSR. There are children who experience multiple school changes, foster parents do not consistently receive school records, and educational issues are not included in the case plan. There was a lack of assessment of educational needs in some instances when there was evidence that the child was experiencing school-related problems, and educational needs were identified and noted in the case record, but no services were provided to address those needs.

Findings also show that Oklahoma is making efforts to ensure that children’s educational needs are met. Eligible youth are enrolled in OHLAP, which is a program set up by the Oklahoma Legislature to help pay tuition for postsecondary education at State colleges and universities for families who meet income guidelines, and youth remain eligible if adopted. Oklahoma also provides tuition waivers for eligible youth in OKDHS or Tribal custody for undergraduate resident tuition at institutions within the Oklahoma State System of Higher Education as well as resident tuition for enrollment in postsecondary programs of area vocational-technical districts. The Lou Hartpence Scholarship and the Education and Training Voucher (ETV) program are assisting youth with college attendance as well.

### **Item 21. Educational needs of the child**

Strength       Area Needing Improvement

#### **Case Review Findings**

Item 21 was applicable for 36 (55 percent) of the 65 cases reviewed. Cases were not applicable if children were not of school age or if children in in-home cases did not have service needs pertaining to education-related issues. In assessing this item, reviewers were to determine whether children's educational needs were appropriately assessed and whether services were provided to meet those needs. The results of this assessment are provided below:

<b>Item 21</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total N</b>	<b>Percent</b>
Strength	7	8	15	30	<b>83</b>
Area Needing Improvement	2	1	3	6	<b>17</b>
<b>Total Applicable Cases</b>	<b>9</b>	<b>9</b>	<b>18</b>	<b>36</b>	
Not Applicable	8	8	13	29	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Item 21 was rated as a Strength when reviewers determined that the child’s educational needs were appropriately assessed and services were provided, if necessary. Item 21 was rated as an Area Needing Improvement when case reviewers determined there was a lack of assessment of educational needs in some instances when there was evidence that the child was experiencing school-related problems (one in-home case and five foster care cases).

### **Rating Determination**

Item 21 was assigned an overall rating of Area Needing Improvement. In 83 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to meet the educational needs of children. This is less than the 95 percent required for this item to be rated as a Strength. A 95 percent standard is set for this item because it is the only item assessed for the outcome.

### **Stakeholder Interview Information**

Stakeholders expressed varied opinions with regard to the State’s efficacy in meeting children’s educational needs. Stakeholders from the State indicated that the educational advocate from the DHS State Permanency Planning Unit consults with counties and provides training on educational advocacy; however, they report that overall education tends to be a low priority. Several stakeholders indicated that while foster parents are persistent in supporting the educational needs of children and are often responsible for getting the child’s academic and immunization records, the agency does not help with this. Stakeholders from Comanche County indicated that relationship building between the agency and the schools has helped to ensure that children get their needs met, and they describe this relationship as “exceptional.” In addition, they report working closely with the Head Start program to enroll young children in foster care.

Stakeholders report that youth have differing opinions. Few youth described having their needs met, and others described being moved around frequently. The loss of credits and lost records create difficulties for youth to successfully complete school. Stakeholders indicate that Oklahoma law requires youth to be in class at the end of the semester or they lose credits for the entire semester. Other stakeholders described difficulty in getting records for children when they transfer schools, not having adequate special needs programs in schools, and children not consistently being enrolled timely as barriers for children to get their educational needs met. Stakeholders also indicated that the Tribes are not always told about Individual Education Plan (IEP) meetings and the resources they have access to. For example, educational testing available through the Tribes is not utilized by OKDHS.

In Oklahoma County, stakeholders report that while attempts are made to keep children in their same school, they often have to change schools when they come into foster care. Stakeholders also describe the agency collaboration with Oklahoma City Public Schools, including contracting with two teachers who do testing, developing a protocol to keep children in their home schools, and providing transportation to and from school and extracurricular activities. However, other stakeholders report that communication problems between the school system and the county are systemic, and there needs to be better coordination between the school and agency.

### Statewide Assessment Information

According to the Statewide Assessment, despite policy requirements, the majority of the educational activities are completed by placement providers, not caseworkers. Foster parents report that educational records are not provided when children are placed. Lack of resources in the child’s home community and school district often prevent staff from maintaining the child in his or her own school, and the child’s education is impacted by placement disruption. Another concern described in the Statewide Assessment is meeting the educational needs of youth placed in group home settings.

Information was gathered from group interviews of 205 youth in out-of-home care who were asked to list strengths of the CW program. As noted, a common strength reported was enrollment of eligible youth in OHLAP. This program, along with tuition waivers, scholarships, and vouchers is critical for our youth, as 72 percent of the youth completing mail-in surveys between 2004 and 2007 report they plan to obtain a college degree. The surveyed youth indicated that placement stability and success in school were closely related. An identified barrier to successful educational transition was the transfer of school records, which resulted in delays in enrollment. Foster parents surveyed in 2006 and 2007 showed that 96 percent of the 355 foster parents that answered this question believe that the educational needs are met for children in foster care.

### Well-Being Outcome 3

<b>Outcome WB3: Children receive adequate services to meet their physical and mental health needs.</b>					
<b>Number of cases reviewed by the team according to degree of outcome achievement</b>					
	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total</b>	<b>Percent</b>
Substantially Achieved	13	11	23	47	<b>82</b>
Partially Achieved	0	1	1	2	<b>4</b>
Not Achieved or Addressed	2	3	3	8	<b>14</b>
<b>Total Applicable Cases</b>	<b>15</b>	<b>15</b>	<b>27</b>	<b>57</b>	
Not Applicable	2	2	4	8	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

### **Status of Well-Being Outcome 3**

Oklahoma did not achieve substantial conformity with Well-Being Outcome 3. The outcome was determined to be substantially achieved in 82 percent of the applicable cases, which is less than the 95 percent required for substantial conformity. Performance on Well-Being Outcome 3 did not vary across sites. The outcome was determined to be substantially achieved in 87 percent of Comanche County cases, 73 percent of Muskogee County cases, and 85 percent of Oklahoma County cases. However, performance did not vary substantively based on the type of case reviewed. The outcome was determined to be substantially achieved in 88 percent (35 cases) of the 40 applicable foster care cases and 71 percent (12 cases) of the 17 applicable in-home services cases.

### **Key Concerns From the 2002 CFSR**

Oklahoma did not achieve substantial conformity with Well-Being Outcome 3 in its 2002 CFSR and was required to address the outcome in its PIP. In the 2002 CFSR, item 22, pertaining to the physical health of the child, and item 23, pertaining to the mental health of the child, were both rated as Areas Needing Improvement. The key concerns identified in the 2002 CFSR were the following:

- DHS was not adequately addressing the health needs of children in both foster care and in-home services cases.
- There is a lack of consistency among DHS caseworkers in attending to children's health needs.
- There was evidence that children did not receive a comprehensive health assessment at entry into foster care.
- There were instances when children had specific needs for health-care services that were not being met.
- There was no evidence that some children were not receiving preventive health-care services.
- Mental health assessments were sometimes not provided, and in some instances children's mental health needs were not thoroughly assessed.

To address these concerns, the agency implemented the following strategies in their PIP:

- Increased child and family access to medical, dental, and mental health services through publishing an electronic directory of physical, dental, and mental health resources
- Collaborating with Oklahoma Health Care Authority and the Department of Mental Health Services to recruit and support providers
- Implementing a KIDS enhancement to ensure that physical and mental health findings are recorded for use in treatment planning

## Key Findings of the 2007 CFSR

During the 2007 CFSR, item 22 (physical health of the child) was rated as a Strength in contrast to the 2002 CFSR when it was rated as an Area Needing Improvement. In addition, despite the efforts of the PIP, item 23 (mental health of the child) was again rated as an Area Needing Improvement in the 2007 CFSR.

Concerns pertaining to the agency's effectiveness in assessing and meeting children's mental health needs that were noted in the 2002 CFSR also emerged as concerns in the 2007 CFSR, particularly with regard to the lack of mental health services in the community, the assessment of the child's needs, and not providing services.

Findings pertaining to the specific items assessed under Well-Being Outcome 3 are presented and discussed below.

### Item 22. Physical health of the child

Strength       Area Needing Improvement

#### Case Review Findings

Item 22 was applicable for 47 (72 percent) of the 65 cases reviewed. Cases that were not applicable were in-home services cases in which physical health concerns were not an issue. In assessing item 22, reviewers were to determine whether children's physical health needs (including dental needs) had been appropriately assessed, and whether the services designed to meet those needs had been, or were being, provided. The findings of this assessment are presented in the table below:

Item 22	Comanche County	Muskogee County	Oklahoma County	Total N	Percent
Strength	11	10	22	43	<b>91</b>
Area Needing Improvement	0	1	3	4	<b>9</b>
<b>Total Applicable Cases</b>	<b>11</b>	<b>11</b>	<b>25</b>	<b>47</b>	
Not Applicable Cases	6	6	6	18	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

Performance on item 22 did not vary substantively across sites. However, there was variation in performance based on the type of case. The item was rated as a Strength in 100 percent (40 cases) of the 40 applicable foster care cases and 86 percent (6 cases) of the 7 applicable in-home services cases.

Item 22 was rated as a Strength when reviewers determined that children's health needs (medical and dental) were routinely assessed and services provided as needed. Item 22 was rated as an Area Needing Improvement when reviewers determined the following:

- There was no indication in the case record of any medical assessments or services even when a case came to the agency because of medical-related concerns (two cases).
- Dental care services were not provided until a year after the need for the service was determined (one case).
- There were no assessments of physical or dental health noted in the case file (one case).

Three of the cases rated as an Area Needing Improvement for item 22 were foster care cases, and one was an in-home services case.

### **Rating Determination**

Item 22 was assigned an overall rating of Strength. In 91 percent of the applicable cases, reviewers determined that the agency was adequately addressing the health needs of children in foster care and in-home services cases. This meets the 90 percent or higher required for a rating of Strength. Item 22 was rated as an Area Needing Improvement in the State's 2002 CFSR.

### **Stakeholder Interview Information**

Stakeholders commenting on item 22 for the onsite CFSR expressed different opinions. Stakeholders from the State described the Fostering Hope Clinic in Oklahoma City, which provides children in foster care with a myriad of services, including medical and mental health services. In addition, stakeholders describe clinic staff helping agency staff navigate through the University of Oklahoma Health Sciences Center (OUHSC) when children need care and are having difficulty accessing services. Medical information is entered into the KIDS system, which enables all parties to have access to the child's medical history. However, some stakeholders from the State report that while the agency does a good job of providing an initial health screening and ongoing exams, there continues to be challenges with children who have special health needs, and dental needs are not always addressed timely.

Many stakeholders said that the agency is effective in meeting children's medical needs. However, other stakeholders said that some children get routine medical and dental care, but other children do not. Several stakeholders noted that dental services and doctors who take Medicaid are not accessible across the State; however, stakeholders report the agency is working to locate more doctors and dentists to take Medicaid.

### **Statewide Assessment Information**

According to the Statewide Assessment, the caseworker is responsible for ensuring, in coordination with the placement provider, that each child in out-of-home care receives all needed routine and specialized medical care in a timely manner. This includes all medical, dental, visual, and behavioral health needs.

The Statewide Assessment describes several efforts aimed at enhancing the medical and dental care of children:

- The OUHSC Department of Pediatrics partnered with OKDHS to develop the Fostering Hope Clinic, a pediatric clinic specifically for children in the custody of OKDHS.
- OKDHS and the Department of Pediatrics have plans to partner with other medical providers, including the Federally Qualified Health Clinics in Oklahoma, to improve access to primary care for foster children.
- The pediatrician and psychologist are under contract with OKDHS to serve as the agency's CW medical director and CW psychological consultant. They both meet regularly with CW staff on the State and local levels.
- The Department of Pediatrics plans to conduct focus groups with CW staff and foster parents to assess their perceived barriers to accessing health care for foster children.
- The Medical History Project is a partnership between the Oklahoma HCA (the State Medicaid agency) and OKDHS and is designed for all children entering OKDHS custody and all children preparing for adoptive placement. HCA staff provide medical claims history information to OKDHS within 24 hours of the request. Information includes immunization records, primary care physician assignment prior to coming into custody, when applicable, and past treatment providers, services, and diagnoses.
- A youth who is in the custody of OKDHS at age 18 can now be eligible for Medicaid until age 21, even if the youth leaves care. OKDHS and the HCA also are developing a process by which children leaving the OKDHS system at age 18 or older will have available to them a summary of their medical history while in foster care.

The Statewide Assessment notes that case review data indicate improvement in the physical health of children. In CY 2006, children in foster care received the initial health screening within 30 days 87 percent of the time. In CY 2006, 96 percent of children in foster care received a health screening within the last 12 months, and 93 percent of children in foster care received a dental assessment. Treatment being pursued for children in foster care in CY 2006 was at 97 percent, and children had updated immunization records for 99 percent of all children in foster care.

### **Item 23. Mental health of the child**

Strength  Area Needing Improvement

#### **Case Review Findings**

Item 23 was applicable for 36 (55 percent) of the 65 cases reviewed. Cases were not applicable if the child was too young for an assessment of mental health needs or if there were no mental health concerns. In assessing this item, reviewers were to determine whether mental health needs had been appropriately assessed and appropriate services to address those needs had been offered or provided. The findings of this assessment are presented in the table below:

<b>Item 23</b>	<b>Comanche County</b>	<b>Muskogee County</b>	<b>Oklahoma County</b>	<b>Total N</b>	<b>Percent</b>
Strength	9	4	15	28	<b>78</b>
Area Needing Improvement	2	4	2	8	<b>22</b>
<b>Total Applicable Cases</b>	<b>11</b>	<b>8</b>	<b>17</b>	<b>36</b>	
Not Applicable Cases	6	9	14	29	
<b>Total Cases</b>	<b>17</b>	<b>17</b>	<b>31</b>	<b>65</b>	

There was variation in performance on item 23 across sites. The item was rated as a Strength in 82 percent of applicable Comanche County cases, 88 percent of applicable Oklahoma County cases, and 50 percent of applicable Muskogee County cases. There also was variation in performance based on the type of case. The item was rated as a Strength in 83 percent (20 cases) of the 24 applicable foster care cases and 67 percent (8 cases) of the 12 applicable in-home services cases.

Item 23 was rated as a Strength when reviewers determined that children’s mental health needs were appropriately assessed, and the identified mental health needs were addressed.

Item 23 was rated as an Area Needing Improvement when reviewers determined the following:

- Mental health needs were not assessed or addressed (five cases).
- Mental health needs were assessed, but not met (two cases).
- Services were provided, but they were not appropriate to the child’s needs (one case).

### **Ratings Determination**

Item 23 was assigned an overall rating of Area Needing Improvement. In 78 percent of the applicable cases, reviewers determined that the agency had made concerted efforts to address the mental health needs of children. This is less than the 90 percent or higher required for a rating of Strength. Item 23 was rated as an Area Needing Improvement in Oklahoma’s 2002 CFSR.

### **Stakeholder Interview Information**

Although stakeholders commenting on item 23 expressed some different opinions regarding the agency’s effectiveness in meeting the mental health needs of children, there were some common themes that emerged. One common theme was that the high turnover rate of mental health professionals affects the quality of care children receive. Stakeholders indicated that meeting children’s mental health needs can be a challenge, and many children are placed in hospitals when outpatient care may be more appropriate. They also describe a shortage of psychiatrists, and children are receiving psychotropic medication through their primary physician. One stakeholder reported that services for boys with substance abuse problems are difficult to find. In addition, stakeholders report that the frequency

with which children move contributes to a disruption in mental health services, as children often change providers each time they change foster homes.

However, stakeholders from the State also report that services are becoming more localized and are serving more children in foster care. Stakeholders in Comanche County report that there are mental health providers who assess and treat children, and children whose parents are in the military can access Tricare mental health services. In Oklahoma County, the Child Study Center and Fostering Hope Clinic provide mental health services to children; however, both reportedly have wait lists.

### **Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma children in foster care receive an initial mental health screening within 90 days of entering the State's custody. The Statewide Assessment describes several program enhancements that have been implemented and expanded to improve the quality and consistency of services to meet children's mental and behavioral health needs:

- In 2004, a program administrator position was added to the Children and Family Services Division (CFSD) management team to lead in the development and coordination of behavioral health care for children in OKDHS custody.
- The System of Care initiative, a community collaboration of agencies agreeing to provide services to keep children in their homes, expanded from 11 to 36 sites and now covers half of Oklahoma's 77 counties.
- The agency contracts with two OUHSC departments--Pediatrics for a licensed psychologist and Pharmacy for a pharmacology Ph.D. These professionals provide consultation and training to OKDHS staff regarding behavioral and mental health services for custody youth.
- Psychologist referrals are made when children screen positive for mental health services in the Fostering Hope clinic and by Group Home and Placement Services Program staff. Pharmacological reviews are requested primarily by Group Home and TFC providers and program staff.
- The agency's collaboration with the State Medicaid agency has influenced several program advancements. Assessment services, provided by outpatient providers, are now Medicaid compensable, and children exiting inpatient care or TFC level of care are immediately authorized for outpatient mental health services.
- The State child serving agencies are working collaboratively to develop an assessment instrument and screening tools with a goal of early identification and intervention of children with mental health and developmental needs.
- OKDHS staff and Department of Mental Health and Substance Abuse Services (DMHSAS) staff identified children leaving custody with mental health issues as an area of priority, and they have funded six sites statewide to provide youth with mental health issues who are aging out of custody or leaving home with a wraparound team to help with counseling.

The Statewide Assessment notes that overall the State has improved in securing developmental and mental health screenings for children in foster care. CFSR data indicate that from CY 2003 to CY 2006 there has been a 3 percent increase in children obtaining initial and ongoing care. Eighty percent (80 percent) of children in foster care received a mental health screening within 90 days of placement in CY 2003 and 87 percent in CY 2006.

## SECTION B: SYSTEMIC FACTORS

This section of the CFSR Final Report provides information regarding the State’s substantial conformity with the seven systemic factors examined during the CFSR. Information on the items included in each systemic factor comes from the Statewide Assessment and from interviews with stakeholders conducted during the onsite CFSR. A score for substantial conformity is established for each systemic factor. Scores of 3 and 4 represent substantial conformity. Scores of 1 or 2 mean that a State is not in substantial conformity with the systemic factor. In addition, information is provided regarding the State’s performance on each systemic factor for the State’s first CFSR. If the systemic factor was part of the State’s PIP, the key concerns addressed in the PIP and the strategies for assessing those concerns would be noted, as well as any changes in ratings that occurred as a result of the State’s second CFSR.

### I. STATEWIDE INFORMATION SYSTEM

<b>Rating of Review Team Regarding Substantial Conformity</b>				
	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
Rating	1	2	3	4
				<b>X</b>

#### Status of Statewide Information System

Oklahoma is in substantial conformity with the systemic factor of Statewide Information System. The State was found to be in substantial conformity with this item during its first CFSR. Findings for the item assessed for this factor are presented below.

**Item 24. State is operating a statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care**

Strength                       Area Needing Improvement

Item 24 is rated as a Strength because the State’s information system can identify the status, demographic characteristics, location, and goals for children in foster care. This item was rated as a Strength in the State’s 2002 CFSR; therefore, it was not required that the State address this factor in its PIP.

### **Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma's SACWIS is known as KIDS, and the system can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care.

Surveys of CW staff in 2006 and 2007 showed that of the 531 staff members answering the statement, "KIDS provides tools that assist me in managing my workload," 95 percent responded, "yes." Of the 470 staff that answered the statement, "KIDS minimizes the duplication of data entry," 76 percent answered, "yes." During interviews, CW staff described the KIDS Help Desk staff as "responsive" and "helpful." KIDS Help Desk staff also conduct KIDS-related CORE training and numerous specialty classes as needed. Interviews with CW staff conducted in 2006 and 2007 indicate that more time needs to be spent on KIDS training during CORE.

Strengths identified in the Statewide Assessment include:

- KIDS can readily identify the status, demographic characteristics, placement, and goals of every child who is in foster care.
- The system is available 24/7, and agency staff can access the system easily.
- KIDS was the first SACWIS implemented statewide and has received several technology related awards. OKDHS is currently working on a SACWIS and an Adoption and Foster Care Analysis and Reporting System (AFCARS) action plan to become fully compliant with Federal standards.
- All facets of the CW program are within KIDS, which includes investigations, foster care, adoption, training, ICPC, and independent living. KIDS is considered the primary case record with supporting paper documents such as the child's birth certificate, social security card, and legal documents being stored in a paper case record.
- KIDS has a file cabinet function that allows staff to store documents and photographs in the KIDS case record. There are numerous ticklers and reports (routine and *ad hoc*) generated to assist in case management activities.
- KIDS is able to provide a report of families inquiring to provide foster care or adoption services to assist staff in tracking these prospective families through the assessment and approval process.
- KIDS interfaces with child support, eligibility, financial management, and juvenile justice to pull information into KIDS from these various data systems.
- Supervisors and management staff have remote access to KIDS during regular nonworking hours. The most frequent request by staff is to allow them to have more than one case open at the same time, which is not feasible in the current application.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR expressed opinions regarding KIDS that are consistent with the information reported in the Statewide Assessment. The following are the key strengths of the system identified by stakeholders:

- KIDS is responsive in that it provides important information about children, including their legal status, location, demographic information, and case goals.
- According to some stakeholders, timeliness of data entry is an ongoing challenge, but the State KIDS unit has a system in place to send emails to field staff when data entry is late or overdue. At the local sites, several respondents stated that the data are current and very accurate.
- They are continuing to enhance the KIDS system, and they are involving staff from the field in the redesign process.
- Stakeholders describe the system as easy to use and helpful.
- Data reports are shared with all levels of staff throughout the agency. Supervisors are able to see what the caseworkers are doing and provide better supervision and accountability.
- KIDS has automated reminders/ticklers to alert agency staff to upcoming important events, such as completion of investigations, caseworker contact, permanency planning reports, and workload status.
- Technical assistance is available and is utilized by staff.
- KIDS and the CQI unit work together to get input from staff and help prioritize changes needed in the application.
- OKDHS KIDS system has an eKIDS ability, which allows staff to access KIDS through the Internet.
- The State has started to work on a new system, called Mosaic, which will join CW, food stamps, child support, and Temporary Assistance for Needy Families (TANF) data systems.

## II. CASE REVIEW SYSTEM

<b>Rating of Review Team Regarding Substantial Conformity</b>				
Rating	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
	1	2	3	4
		<b>X</b>		

### Status of Case Review System

Oklahoma is not in conformity with the systemic factor of Case Review System. Oklahoma was rated as not in conformity with this factor during its first CFSR; therefore, it was required that the State address this factor in its PIP.

## **Key Concerns From the 2002 CFSR**

- The case record review process revealed that although case plans are completed for all children, in 40 percent of cases reviewed parents did not participate in a case-planning process. The common pattern for these cases was for the caseworker to complete the case plan and then present it to parents for their review and signature.
- Some stakeholders commenting on this issue suggested that families are routinely involved in developing the Family/Child Strengths and Needs Assessment component of the case plan, but not the Treatment Plan component. Policy may not be implemented in practice due to the high level of staff turnover among caseworkers and the excessive caseloads that often result from frequent staff turnover.
- Data from KIDS indicate that less than 1 percent of the children in out-of-home placements have had a permanency hearing as per statute; 27 percent of the children have had a permanency hearing, but not within the time frames required by statute; and 73 percent of the children have no information entered into KIDS regarding a permanency hearing. The agency has been unable to determine whether this problem is due to poor data entry, to the fact that no permanency hearing has been held, or to the lack of court documentation of a permanency hearing having been held.
- The 12-month permanency hearing is not as formal as it needs to be, with appropriate issues being discussed and with court minutes provided. Judges interviewed during the Onsite Review said that all of the hearings they convene focus on permanency issues, and they are working to formalize “minutes” of permanency hearings.
- Notification of foster parents, pre-adoptive parents, and relative caregivers of reviews or hearings was not found to be occurring on a consistent basis, and there was no consistency with regard to the opportunity for these caregivers to be heard in court. Several stakeholders expressed concern that all parties may not consistently receive notification of hearings. Foster parents indicated that sometimes they received notices and sometimes they did not. Also, they noted that receiving notification just one week prior to the hearing did not give them sufficient time to arrange their schedules and the children's schedules.
- Tribal representatives indicated that provision of notice to Indian families by both DHS and the courts is inconsistent.
- Stakeholders also expressed mixed perceptions regarding whether foster parents, pre-adoptive parents, and relative caregivers are permitted to have a voice in court. Some foster parents indicated that when they appear in court, their input is solicited, and, in one county, when they did not appear in person, they were able to submit their opinions in a written report. Other stakeholders, particularly those participating in the Tribal focus groups, indicated that there are judges who will not allow foster parents to be heard in court.

## **Key Strategies Implemented in the 2002 PIP**

- The agency implemented Individual Service Plans (ISP), which included the development of a template in KIDS and training for supervisors on the ISP.
- The agency provided judges a list of due dates for permanency hearings.

- County directors developed strategies to improve their partnership with the courts and district attorney.
- County directors implemented a process to notify foster parents and caregivers of court hearings.

**Item 25. Provides a process that ensures that each child has a written case plan to be developed jointly with the child’s parent(s) that includes the required provisions**

Strength       Area Needing Improvement

Item 25 is rated as an Area Needing Improvement. Although the State has a process in place for engaging parents in case planning, 47 percent of the cases reviewed were rated as an Area Needing Improvement for involving parents in case planning. This item also was rated as an Area Needing Improvement in the State’s 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment the caseworker and the family develop the initial ISP after the Family/Child Strengths and Needs Assessment is completed and prior to the dispositional hearing. Participation or input from the parent(s); legal guardian; placement provider; child, when appropriate; child’s attorney; Tribe; and GAL when applicable, are utilized in the development of the plan. An age appropriate child, regardless of legal status, participates, if feasible.

The Statewide Assessment reports that input into case planning is usually obtained from the parent; however, CW staff do not always include the child, placement provider, child’s attorney, Tribe, and GAL in formalized case planning. Informal involvement occurs at different stages in the process. This continues to be another area where CW staff may not address the noncustodial parent as well as the custodial parent.

Judges and assistant district attorneys surveyed in 2007 indicate that the documentation of parents’ progress on the ISP is often unclear, not updated accurately, and at times confusing. Surveys of CW staff in 2006 and 2007 reveal that 90 percent of the staff surveyed believe they are including parents, 62 percent believe they are including the child, and 68 percent believe they are including foster parents in case planning. Mail surveys received during 2004 through 2007 indicate that 58 percent of parents report they have “helped plan” for their child, with an additional 14 percent reporting they helped plan for their child “sometimes.” Surveys of CW staff in 2006 and 2007 demonstrate that 59 percent of the staff reported that placement plans are consistently completed for children in out-of-home care.

**Stakeholder Interview Information**

There was unanimous agreement among stakeholders commenting on this item during the onsite CFSR that DHS prepares case plans for all children in foster care and for the in-home services cases, and these case plans are developed in a timely manner. However, there was wide variation in stakeholder opinions regarding the involvement of parents and youth in the case-planning process. Some

describe the process of developing a “Family Strengths Need Assessment” at the start of services, and based on this document the caseworker types up the plan and then has the family sign it. Several stakeholders described the caseworkers completing the plan at the office without the family’s input and then taking them to parents to sign. However, some stakeholders in Oklahoma City described parent and child involvement in the case-planning process when Family Group Conferencing is used. Others describe “cookie cutter” plans and expressed concern that Spanish-speaking staff are not available to assist families in understanding their plans.

The findings of the Onsite Review with regard to child and family involvement in case planning (item 18) are congruent with information in the Statewide Assessment and stakeholder opinions. This item was rated as an Area Needing Improvement in 47 percent of the cases. The rating was due to the lack of involvement of 55 percent of fathers (22 cases), 20 percent of mothers (10 cases), and 28 percent of age appropriate children (9 cases).

**Item 26. Provides a process for the periodic review of the status of each child no less frequently than once every 6 months, either by a court or by administrative review**

Strength                       Area Needing Improvement

Item 26 is rated as a Strength because the State is conducting periodic reviews at least once every 6 months. This item was rated as a Strength in the State’s 2002 CFSR; therefore, it was not required that the State address this factor in its PIP.

**Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma statute requires that the court review every case regarding a child who is alleged to be or is adjudicated deprived no later than 6 months after the date of the child's out-of-home placement and at least once every 6 months thereafter until the child is returned to the custody of the parent(s), legal guardian, or legal custodian. Such review continues until the conditions that caused the child to be adjudicated deprived have been corrected, permanent care and custody has been awarded to a suitable custodian or kinship guardian, or the parent(s)' rights have been terminated and final adoption decreed. OKDHS policy requires that CW staff provide the court with the necessary documentation for each of these hearings.

The Statewide Assessment describes practice in Oklahoma as consistent with statutory requirements. Each deprived case is reviewed at least once every 6 months with very few exceptions. Current practice indicates that there has been a significant improvement on the documentation of the periodic reviews in SACWIS. Based upon a review in the database that contains case information on children in OKDHS custody, 87 percent of the children currently in out-of-home care in March 2007, have had a periodic review within 6 months of the last review. An enhancement of SACWIS has been released that will not allow a new court report to be created until the court hearing date for the previously created court report has been entered into SACWIS.

The Court Program Improvement Plan progress report (August 2006) indicates that moderate progress has been made towards the following recommendations: courts take more time in review hearings to conduct an indepth review of case progress; courts schedule all hearings in a “time-certain” fashion and limit the stacking of multiple hearings in the same grouping; and that OKDHS, the court, service providers, and other appropriate parties conduct a careful review of case progress report formats and establish baseline requirements that all progress reports should meet.

### **Stakeholder Interview Information**

There was consensus among stakeholders interviewed during the onsite CFSR that cases are being reviewed at a minimum every 6 months.

The following were listed as key strengths described by stakeholders:

- Reviews are held a minimum of every 6 months or often more frequently. Many stakeholders report going to court every 90 days.
- In addition, the Post Adjudicatory Review Board (PARB) functions as a periodic review body, and they serve in an advisory capacity to the judge. This report gives the judge another perspective about the case.
- Ticklers help ensure reviews are held timely.
- The relationship between DHS and the courts is described as collaborative, which supports timeliness of reviews.

Despite the strengths listed, a few stakeholders reported concern over the quality of reviews and describe “rocket dockets” with as little as 10 minutes per hearing. Several stakeholders believe that too much casework is done in the courtroom; if good casework and decisions were made in advance of the hearings, permanency could be expedited. Several stakeholders also cited staff turnover as an issue contributing to delayed permanency.

**Item 27. Provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter**

Strength                       Area Needing Improvement

Item 27 is rated as a Strength because OKDHS ensures that permanency hearings are held no later than 12 months from the date of entry into foster care and no less than 12 months thereafter. This item was rated as Area Needing Improvement in the State’s 2002 CFSR. OKDHS met its target goal for this systemic factor before the end of the PIP implementation period.

### **Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma statute and OKDHS policy requires a permanency hearing to be held no later than 6 months from the date the child was placed in out-of-home care and no less frequently than every 6 months thereafter. Statute allows

the permanency hearing to be held concurrently with the required review hearing. Current practice indicates that there has been a significant improvement on the documentation of the permanency hearing in SACWIS. Based upon a review of the current query in the database that contains case information on children in OKDHS custody, 96 percent of the children currently in out-of-home care in March 2007, have had a permanency hearing within the last year.

As indicated in the Statewide Assessment, the Court Program Improvement Plan progress report indicated that significant progress has been made with the courts conducting permanency hearings and requiring that a permanent plan for the child be developed and approved at the hearing. Judges surveyed to assess the progress of the Court Program Improvement Plan reported that 29 percent of the judges “always” conduct a permanency hearing within 6 months after the child entered out-of-home care, 35 percent indicated that they “usually” do, 14 percent reported they “often” do, and 11 percent indicated that this only occurs “occasionally.” Interviews with judges and assistant district attorneys conducted in 2007 found that hearings are often documented as permanency hearings, but there are inconsistencies and some confusion regarding the content required to be covered during these hearings. Surveys in 2006 and 2007 found that 92 percent of the CW staff believe that permanency hearings are occurring within 6 months of a child’s entry into out-of-home care and at least every 6 months thereafter.

**Stakeholder Interview Information**

A majority of stakeholders interviewed during the onsite CFSSR expressed the opinion that permanency hearings are held in a timely manner; however, stakeholder responses differed with regard to how effective the hearings are in moving a case forward to achieve timely permanency. There was consensus that many judges hold permanency hearings concurrently with periodic reviews.

Stakeholders in Muskogee County describe judges as highly involved in the cases and describe reviews as substantive and addressing the issues of the family. Stakeholders reported that most judges hold permanency hearings concurrently with periodic reviews. Stakeholders had varied responses regarding the quality of permanency hearings. Stakeholders from the court system believe permanency hearings are of quality and address permanency needs. Some stakeholders from the State believe there is variance in terms of the quality of the permanency reviews with some hearings lasting 10-15 minutes and others holding full evidentiary hearings. Several Oklahoma City stakeholders describe a process that ensures hearings occur in a timely manner. However, due to the number of cases reviewed, it may be difficult to have substantive discussions regarding permanency needs for the family.

**Item 28. Provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act**

Strength       Area Needing Improvement

Item 28 is rated as an Area Needing Improvement because TPR petitions are not filed timely or are delayed. Item 28 was rated as a Strength in the State’s 2002 CFSSR.

### **Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma statute requires that a petition for TPR be filed, or an exception determined, for all children in out-of-home care based upon the 15 of 22 months provision outlined in ASFA. Policy mandates that CW staff request TPR, when appropriate, or document the determination of an exception. The caseworker documents the request for TPR or the type of exception that has been determined in SACWIS in the Court/Par Rights/Recommend screen within 5 working days. The Statewide Assessment describes the use of ticklers to notify CW staff, judges, and district attorneys regarding the length of time children in OKDHS custody have been in out-of-home care and the need to address permanency.

Two issues identified in the Statewide Assessment that impact the filing of a petition for TPR are that CW staff are not making the requests timely, and if the district attorney or judge does not support TPR, children are often left to wait in the system without permanency. Data from the State CFSR indicate the percentages where children who have been in out-of-home care for at least 15 of 22 months or meet other ASFA criteria, have a petition filed, or an exception documented varied in the last 4 years: 75 percent in CY 2003, 84 percent in CY 2004, 77 percent in CY 2005, and 80 percent in CY 2006.

Interviews with CW staff, foster parents, judges, district attorneys, other attorneys, and CASAs indicate that this is an area where Oklahoma needs improvement. The total of all opinions indicate that 65 percent of the 150 interviewed felt that either a petition for TPR or an exception has been documented in cases where children had been in out-of-home care 15 of the last 22 months. Thirty-four percent of the CW staff felt that TPR occurred timely in comparison with 85 percent of the judiciary staff.

### **Stakeholder Interview Information**

The consensus of most stakeholders interviewed during the onsite CFSR is that the agency is requesting TPR in a timely manner, but stakeholders acknowledged that the actual filings are often delayed due to the courts and district attorneys not always filing TPR as requested by the agency.

Various stakeholders attributed delays in the TPR process to the following:

- There is a lack of education for attorneys regarding permanency and TPR.
- Communication about the case between DHS staff and district attorneys is not consistent.
- In some cases, the courts are unwilling to pursue TPR because of the belief of some judges that older children generally are “not adoptable.” The court believes that it is in the best interest of the child not to pursue the TPR petition.
- The court often will not pursue TPR if a child indicates that he or she does not want to be adopted, particularly if the child is 12 or older. However, it is unclear if the potential benefits of adoption are fully explored with the child, and the possibility of adoption is revisited at a later time.
- Some judges will not pursue TPR if the child does not have an identified adoptive placement.
- TPR is often requested by DHS staff but is not filed by the district attorneys if there is not a permanent family and if the child’s attorney does not support the TPR petition.

- Stakeholders report that in some instances 15 months is not adequate to determine if TPR is the best option or to give the family a chance to complete the required steps for re-unification.
- TPR is not pursued until pending criminal charges against a parent are resolved.
- The courts may pursue a case goal of guardianship and do not always pursue TPR when re-unification appears unlikely, particularly for older children.

Stakeholders mentioned several practices that, while not used in all cases or counties, have shown to support TPR and permanency when used:

- Mediation has been used in a limited number of cases, and when used it has reduced the number of cases that go to court.
- Family Drug Court cases move through the system more quickly and efficiently.
- Judges meet with children in their chambers as opposed to in the courtroom, which allows children to speak more openly and helps judges make better decisions for children.
- A new permanency caseworker field liaison provides support to staff and helps move the process along.

**Item 29. Provides a process for foster parents, pre-adoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child**

Strength       Area Needing Improvement

This item is rated as an Area Needing Improvement. Although the agency does have a process in place to provide notification of hearings and reviews to foster parents, pre-adoptive parents, and relative caregivers of children in foster care, compliance varies according to the caseworker involved. Stakeholders report inconsistent notification and opportunity to be heard. This item was rated as an Area Needing Improvement in the State’s 2002 CFSR. The State addressed this item in its PIP by having county directors develop a system in each county to notify foster parents of court hearings and reviews. The State also collected information from foster parent surveys to determine notification of hearings and reviews.

**Statewide Assessment Information**

According to the Statewide Assessment, OKDHS policy requires written notice of review and permanency hearings be provided to the pre-adoptive parent(s), relative placement provider(s), and current foster parent(s). The notice is to be delivered to the applicable parties no later than 15 days after the hearing is set. If the child moves after the notification has been provided, notification is provided to the current caregiver no later than 7 days prior to the court hearing. The caseworker documents in the SACWIS Contacts screen when and how the notification was delivered. If the caseworker updates the next hearing date field in the SACWIS Court Hearing screen, the hearing notification form will automatically generate for the caseworker and can be completed and printed for appropriate dissemination.

However, the Statewide Assessment describes in practice how many caseworkers provide verbal notification rather than the required written notification. Changes to requirements in SACWIS have been made to require that the court hearing information be entered for every report prepared. As part of the development of the Statewide Assessment, interviews were held with CW staff, foster parents, judiciary staff, district attorneys, other attorneys, CASAs, and supervisors, which indicated a variance in how well they believe that CW staff are effective in providing notification. Of the 133 interviewed, 21 were foster parents and 86 percent agreed that they were provided notification; however, 100 percent of the 25 judges interviewed felt that foster parents, relatives, and pre-adoptive parents were notified of review and permanency hearings.

Of the 149 stakeholders interviewed for the Statewide Assessment, 91 percent agreed that foster parents, pre-adoptive parents, and relative caregivers are provided the opportunity to be heard in court. This percentage matched the opinion of the 22 caregivers interviewed. Of the 25 CW staff, 88 percent agreed and 86 percent of the 21 legal staff agreed. In comparison, of the 28 members of the judiciary staff, 96 percent agreed. Three Tribal judges interviewed in 2007 report that foster parents are provided opportunities to be heard during review hearings. Tribal CW staff was surveyed in 2007 with 89 percent agreeing that foster parents are provided opportunities to participate in court hearings. In surveys of 10 State judges responsible for deprived cases, five reported that resource (including foster, pre-adoptive, and relative) parents are “almost always” provided opportunities to be heard in review hearings, and five reported they are “always” provided this opportunity. Thirteen assistant district attorneys assigned to deprived cases were surveyed in 2007, with four reporting that resource families are provided opportunities to be heard in court “some” of the time, six reporting they are provided opportunities “almost always,” and three reporting this occurs “always.” Of the foster parents that were surveyed during focus groups in 2006 and 2007, 83 percent reported they are advised of court hearings, and 71 percent reported they are provided opportunities to be heard during the hearings.

### **Stakeholder Interview Information**

Oklahoma law requires that notice be given to foster parents, pre-adoptive parents, and relative caregivers of children in foster care. Stakeholders were in agreement that most foster parents are notified about reviews and hearings, although there were differences of opinion regarding the timeliness of the notifications. However, with regard to initial notice to foster parents of the first hearing, there were some who stated that they were not notified. Stakeholders had different opinions about who is responsible for notification of foster parents - DHS or the courts. Because the stakeholders with these divergent opinions usually were either DHS or court staff, their lack of agreement suggests an absence of clarity about the notification process. When notification is not given, it was attributed to staff not entering data in KIDS that would trigger notification to foster parents. Stakeholders report that foster parents, pre-adoptive parents, and relatives receive notice of the PARB, but they describe limited participation.

### III. QUALITY ASSURANCE SYSTEM

Rating of Review Team Regarding Substantial				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	4 X

#### Status of Quality Assurance System

Oklahoma is in substantial conformity with the systemic factor of Quality Assurance System. During the first round of the CFSR, Oklahoma was found to be in substantial conformity with this systemic factor and, therefore, was not required to address the factor in its PIP. Findings with regard to the specific items assessed for this factor are presented below.

#### **Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children**

  X   Strength                           Area Needing Improvement

Item 30 is rated as a Strength. The State has implemented a number of standards and policies to ensure that children in foster care are provided quality services, including contact guides for caseworkers to follow when visiting children and monthly supervisory case reviews. This item was rated as a Strength in the State’s 2002 CFSR.

#### **Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma policy requires face-to-face visitation with each child in his or her out-of-home placement at least monthly. Foster parents are to allow private conversations between caseworker and child, and caseworkers are required to document visitation location and results of the visit. Caseworker visitation is measured by SACWIS, and administration at all levels focus on this report. The State CFSR looks closely at the contacts between caseworkers and children and evaluates if the visit offers an opportunity for the child to discuss treatment planning and his or her current status in the home.

The State CFSR (CY 2003 – CY 2006) indicates that the State as a whole is functioning at about 90 percent on visitation by county of jurisdiction, placement, and contract staff. Over that same period, the State CFSR indicates substantive discussion occurs with the child and care provider in more than 90 percent of the cases. The Statewide Assessment describes “contact guides,” which offer a basis for discussion with the child and caregiver and an opportunity to review the child’s permanency plan and service needs; however, turnover continues to be a barrier for the State with regard to quality service.

The Contract Performance Review (CPR) unit was implemented in January 2003. The CPR unit completes annual reviews with each agency that contracts beds with OKDHS for custody children. The agencies include TFC, specialized community homes, group homes, residential treatment facilities, and acute treatment facilities to ensure safety, permanency, and well-being by measuring outcomes. The reviews are based on the Federal CFSR model and look at outcomes for children as well as contract compliance. The reviews are done in collaboration with the agencies and are offered as a guide to improve services and outcomes for children. The CPR review process ensures that children in out-of-home care are provided quality services that protect the safety and health of the children in above traditional foster care level of care.

### **Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR noted that service standards are in place that apply to the quality of services that are provided to children in foster care. Most stakeholders expressed the opinion that standards are in place to ensure quality services and the safety and health of children in foster care, including standards to regulate behavior management (i.e., physical restraints) policies, practices, incidents, and complaints (for institutional workers). Stakeholders report DHS is in the process of developing a dual home study that can be used for both foster and adoptive homes; however, there are some exceptions made for kinship homes that are not allowed for adoptive homes. Stakeholders from the State report that it will be necessary to provide more training on what exceptions will and will not be approved.

Stakeholders noted that standards are monitored and maintained through the following efforts:

- Contact guides being used by caseworkers ensure staff covers important issues when visiting children.
- Monthly face-to-face visits with foster children are monitored through monthly reporting system.
- There is a new safety assessment process for staff to use in foster and adoptive homes.
- Supervisory case reviews are completed monthly, and they use the CFSR instrument to focus on safety.
- Agency administrators have started interviewing groups of children in foster care to determine if standards are being followed.
- Implementation of diligent search to locate appropriate relatives to ensure safety of placements has been implemented.
- Psychotropic medication use for children must be approved by caseworkers, and the psychotropic medication use and information is shared with biological parents.

**Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented**

Strength

Area Needing Improvement

Item 31 is rated as a Strength. The State has a comprehensive QA case review system in place, including monthly supervisory case reviews. On average, the State reviews over 700 cases a year using the State CFSR process. This item also was rated as a Strength in the State's 2002 CFSR.

### **Statewide Assessment Information**

According to the Statewide Assessment, the State began developing a CQI unit in 2000 and the State CFSR for each county in January of 2001. The State CFSR is based on the Federal model and has been automated since its inception. The Statewide Assessment reports that on average, over 700 cases a year are reviewed in the State CFSR process with approximately 350 of the cases having interviews with the child, family, care providers, and other involved parties. The remaining cases are reviewed in SACWIS. The CQI unit completes specialized reviews on specific issues and locations when the need arises. Systemic interviews have been conducted with external stakeholders including Tribes, judges, district attorneys, private attorneys, service providers, foster parent groups, and youth groups. Information from the State CFSR and input from line staff during systemic group interviews has been used to make improvements in SACWIS over the past 6 years.

The State created a CPR unit that reviews contracted placement agencies with children in placement above traditional foster family care. The reviews are based on the CFSR model and look at outcomes for children, as well as contract compliance. The reviews are done annually in collaboration with the agencies and are offered as a guide to improve services and outcomes for children.

### **Stakeholder Interview Information**

All stakeholders interviewed during the Onsite Review described the annual State CFSR process for Oklahoma, and most describe it as effective. Stakeholders report there is a QA specialist assigned to each county, and they utilize a peer review process and conduct stakeholder interviews as part of the CFSR process. Stakeholders describe significant improvements in outcomes since implementing the CFSR in 2000. After the CFSR is complete, a final report is written for each county and legislation is passed that offers monetary incentive to counties who have positive outcomes. Each county has developed its own PIP as a result of the Federal CFSR. Stakeholders describe the QA process as addressing everything from individual staff level issues to larger systemic issues reviewing both qualitative and quantitative issues. Tribal representatives interviewed report the ICWA liaison from DHS completes the State's Tribal CFSRs. In October 2006, the State began implementing new practice standards. Stakeholders also described the CPR unit, which looks at contracts, outcomes for TFC group homes, and psychiatric facilities, and they conduct 80 reviews per year, look at cases, interview children, therapists, and foster parents.

Stakeholders agree that a challenge with the State CFSR system is that there is no follow-up with the counties after the annual CFSR process is complete as the QA staff do not come back to the site or other follow-up. They indicated that this is a weakness in the system. On the other hand, State stakeholders indicated that the legislature passed a statute to provide "incentive money" to county offices that meet certain performance levels on their State CFSR.

**IV. TRAINING**

<b>Rating of Review Team Regarding Substantial Conformity</b>				
Rating	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
	1	2	3	4 X

**Status of Training**

Oklahoma is in conformity with the systemic factor of Training. Findings with regard to the specific items assessed for this factor are presented below. Oklahoma was in substantial conformity during the 2002 CFSR.

**Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services**

Strength       Area Needing Improvement

Item 32 is rated as a Strength. The State has a process in place for ensuring initial training for all staff, which starts within 6 months of a new caseworker’s hire date and must be completed within the first year. This item was rated as a Strength in the State’s 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, Oklahoma CW policy requires all new caseworkers to complete the Caseworker Development Plan. The plan includes 5 weeks of CORE training, mandatory specialized workshops, on-the-job training, structured mentoring, and intensive supervision. CORE training is a competency-based training program that consists of 124 hours of training presented in 5 weeks with nine modules. There are 4 weeks of classroom training and 1 week of on-the-job training. During the on-the-job training, specific activities are assigned to the new caseworkers to complete during their week in the county office. All new caseworkers are enrolled in CORE and are expected to start within 6 weeks of their hire date. They are required to complete pre-CORE activities in the office including shadowing an experienced caseworker, completing referrals, and accompanying the experienced caseworker to court for Child Protective Services (CPS) and permanency planning cases.

The Statewide Assessment describes an evaluation of the CORE training that is done on an annual basis by the CW Enhancement Program of the University of Oklahoma, School of Social Work. Caseworkers are surveyed approximately 6 months after they complete CORE training. The questionnaire is distributed to caseworkers after they have an opportunity to practice in the field for a period of time and can, therefore, give better feedback about the usefulness of their CORE training experience.

### **Stakeholder Interview Information**

The opinions expressed by stakeholders interviewed during the onsite CFSR are consistent with the information provided in the Statewide Assessment. Stakeholders reported that there are many positive things about the CORE training, and, for the most part, it is sufficient to prepare caseworkers for their jobs. They reported that the training modules address the knowledge and skills needed by placement caseworkers and in-home services caseworkers. Stakeholders also were in agreement that there are no exceptions; no staff person is assigned a case prior to completing CORE training. There are additional activities for new caseworkers including field experience activities, the assignment of a mentor, and ongoing testing to assess skills. Stakeholders describe an improved supervisor CORE training that is focused on skill building and ongoing support, including enrollment in an ongoing quarterly case management group.

Stakeholders reported that approximately 360 new caseworkers attend CORE training each year, which is held in Norman, Oklahoma at the training center. New caseworkers are expected to complete the Level I CORE training within the first year of employment; the training unit preregisters all new staff for Level I CORE training to ensure attendance, and stakeholders reported no concerns regarding completion of Level I training. Caseworkers must complete Level II CORE training within 48 months of completion of Level I, and training staff send a report to county directors twice a year with the names of individuals who still need to complete Level II training. There is an informal process in place to provide feedback to county directors throughout the caseworkers' first year of training. Stakeholders reported there is an expectation that cases not be assigned to a new caseworker until Level I CORE training is completed, and the training unit recommends that caseworkers be given a gradually increased caseload after completion of Level I CORE.

Stakeholders expressed some concern that, although Tribes can participate in the training, they do not attend on a regular basis. In addition, they expressed concern that ICWA training was insufficient to ensure a clear understanding of the law and the Tribal communities.

### **Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP**

  X   Strength                      \_\_\_\_\_ Area Needing Improvement

Item 33 is rated a Strength because Oklahoma DHS requires all caseworkers to complete Level II CORE training, and all staff must complete 40 hours of training every year. In addition, supervisors are enrolled in a case management group which includes quarterly training and case consultation. This item was rated as a Strength in the State's 2002 CFSR.

### **Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, after the completion of CORE training, caseworkers are assigned a training track specific to their work assignment. All CW staff must complete Level I training within 12 months of the participants' completion of CORE training. All Level II training must be completed within 48 months after the completion of CORE. Level III is open to all caseworkers who completed CORE, Level I and Level II training. In fiscal year (FY) 2006, 54 Level I workshops were offered and 1496 staff attended, 46 Level II workshops were offered with 1088 attending, and 14 Level III workshops were offered with 317 individuals participating.

The Statewide Assessment also reports that the CQI unit measures effectiveness of CW training throughout the State and has completed surveys with CW staff, which address issues surrounding training. Of 499 CW staff surveyed throughout CY 2006 and CY 2007, 77 percent reported that the training provides them with the skills and knowledge needed to carry out their duties. Similarly, 75 percent of those surveyed reported that the training is consistent with practice and instruction received in the field. Over half of the supervisors (53) responding to the survey report the "opportunity to share about common practice issues with peers" is one thing they find most helpful about clinical consultation.

### **Stakeholder Interview Information**

Most stakeholders commenting on this item during the onsite CFSR noted that caseworkers were required to complete 40 hours of ongoing training each year, and most describe the training as sufficient to meet their ongoing needs. Training is divided by levels based on the staff's position, therefore, ongoing training is geared specifically to their job responsibilities. Stakeholders also mentioned that all training is tracked through the KIDS database. For the most part, stakeholders report that staff do receive the 40 hours of training; however, they report there are some instances when it does not occur. Some of the topics described by Oklahoma City stakeholders include motivational interviewing, skills in engaging families, sexual abuse, and substance abuse treatment. They also described crosstraining opportunities with law enforcement and a large annual statewide conference that includes domestic violence and substance abuse organizations. Ongoing supervisor training includes topics such as coaching and emotional intelligence; in addition, they receive clinical consultation from both peers and a clinical consultant.

However, other stakeholders reported that there is not enough advanced training for tenured staff. A few stakeholders indicated that training topics are repetitive, and they would like to see more specialized trainings offered to staff. Stakeholders describe a lack of localized training and needing to travel long distances to attend ongoing training. Stipend opportunities for advanced degrees is an area of confusion for staff, and some stakeholders report that the program had ended, while others believe it is still available.

**Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children**

X   Strength

       Area Needing Improvement

Item 34 is rated as a Strength because the State requires 27 hours of pre-service training for all foster and adoptive parents and requires 12 hours of annual in-service training for foster parents. OKDHS provides various opportunities for in-service training, including an annual foster parent conference. This item was rated as a Strength in the State’s 2002 CFSR.

### **Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, OKDHS requires 27 hours of pre-service training for all foster and adoptive parent applicants prior to OKDHS reimbursement for foster care or adoptive placements. The in-service training requirement is 12 hours each calendar year. Both pre-service and in-service training records are documented in the family’s resource case and maintained in SACWIS. OKDHS requires contracted TFC agencies to provide 41 hours of pre-service training to applicants prior to applicant approval and 18 hours of in-service training during each reassessment year. Contracted TFC agencies provide a core pre-service training curriculum and additional training components specific to the behavioral and emotional needs of children in TFC placement settings. Contracted group home providers and contracted TFC agencies train their staff consistent with OKDHS Division of Child Care, OKDHS CFSR, Oklahoma HCA policies, and OKDHS Children and Family Services contract requirements.

The Statewide Assessment reports that OKPRIDE, modified from PRIDE (Parent’s Resource for Information Development Education) became the new foster and adoptive parent pre-service training curriculum in July 2007, replacing OKPATH (Oklahoma Parents As Tender Healers). The Statewide Assessment notes that the involvement and oversight of adoption and foster care program staff in the development and ongoing evaluation of resource family training allows for modification of training as needed. OKDHS foster parents completed surveys between 2006 and 2007, and 93 percent of the foster parents who responded to training questions reported that “training provides me with the skills and knowledge needed to meet the individual needs of the children placed in my home.”

### **Stakeholder Interview Information**

A majority of stakeholders commenting on this item during the onsite CFSR concurred with the strengths and barriers outlined in the Statewide Assessment. The PRIDE training is described as a 27 hour pre-service curriculum. The training is required before a family can be licensed and placement of a child is made. There was consensus among stakeholders that the initial training for foster parents was generally effective, and many stakeholders concurred that placements are not made prior to completion of the training and certification, with the exception of relative placements. Some stakeholders interviewed during the onsite CFSR report looking forward to the Bridge concept being incorporated into the foster parent training. In addition, they describe an additional 12 hours of training mandated annually for licensed foster care givers, although some stakeholders noted that there are times that foster parents don’t complete the 12 hours of annual training. Stakeholders describe additional offerings provided at an annual State conference for foster parents and a monthly newsletter for foster parents called *Connections*.

Specific areas that were cited as needs by stakeholders during the CFSR:

- It can be difficult for foster parents to meet the requirement for 12 hours of ongoing training due to their busy schedules, and the DHS training schedule is not flexible.
- Foster parents could benefit from a mentoring program.
- Specific training for kinship care is an identified need.
- Foster parents need more training in dealing with behavioral challenges and psychotropic medication.
- Foster parents are sometimes unclear how to access ongoing training.
- Foster parents are sometimes unsure how to connect with foster parents associations.
- The training on accessing community resources could be more comprehensive.
- Reimbursement for ongoing training can be an issue.
- A few stakeholders in Comanche County reported that foster parents are unclear about the ongoing training requirements and how to access training.

**V. SERVICE ARRAY**

<b>Rating of Review Team Regarding Substantial Conformity</b>				
	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
Rating	1	2	3	4
		<b>X</b>		

**Status of Service Array**

Oklahoma is not in conformity with the systemic factor of Service Array. The State also was not in substantial conformity with this systemic factor in the 2002 CFSR and, therefore, did need to address this factor in its PIP.

## **Key Concerns From the 2002 CFSR**

- There was wide variation across the State with respect to the availability of key services to children and families. As noted in the Statewide Assessment, the array of child protective, permanency planning, and adoption services are provided in all county CW agency field offices, with an office located in all of the State's 77 counties.
- Oklahoma is a largely rural State, and families residing in rural areas are dependent on transportation to larger metropolitan areas for many services.
- Many rural communities cannot recruit professional mental health and medical staff willing to locate to their areas. OCS, through its multiple community contracts, is able to provide general and comprehensive services in all areas of the State, but many of the contractors in more rural communities experience recruitment challenges, which result in high levels of staff vacancies. Stakeholders in the more rural counties identified several service gaps, noted that families often have to travel long distances to obtain services, and expressed concern about long waiting lists, especially for mental health services and residential treatment.
- The State did not always provide individualized services to families, particularly in-home services cases, as required by DHS policy.
- In a large percentage of the case records reviewed, families were not involved in the development of their case plans or treatment plans, and in many cases the service availability appeared to drive the treatment plan rather than the reverse.
- Some stakeholders commenting on this issue also expressed the opinion that in many cases of child maltreatment, particularly in-home services cases, the agency response is to provide standard services such as parenting classes and counseling rather than adopting a more individualized service approach.

## **Key Strategies Implemented in the 2002 PIP**

- Developed, monitored, and implemented county PIPs to increase foster and adoptive home resources
- Resource development specialist identified for each county
- Implemented standardized resource recruitment reporting system
- Report developed to track inquiries by resource families
- Participated in Casey Foundation recruitment demonstration (Breakthrough Series Collaborative)
- Implemented contractual incentives for TFC recruitment of urban resources
- Revised TFC monthly reports to identify children placed more than 25 miles away
- Clarified roles for resource coordinators in facilitating TFC placements in close proximity
- Surveyed surrounding States for contract incentives or performance based procedures to influence resource availability
- Sought data to analyze the percent of TFC and basic care children placed out of a 40-mile radius, developed strategies to impact out-of-area placements, and incorporated in new contracts for July 2004
- Reviewed and refined ISPs

- Developed resource directory detailing all licensed health, mental health, and dental providers available online through the CQI website

**Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency**

Strength       Area Needing Improvement

Item 35 is rated as an Area Needing Improvement. Although there are many services available in the State, the high number of referrals and the complex needs of families often exceed the resources available. As a result, families are often placed on waiting lists. In addition, courts may order services for families and, while the State may have funds for services, the funds are often exhausted or the mandatory services are not available. Item 35 was rated as a Strength in Oklahoma’s 2002 CFSR.

**Statewide Assessment Information**

According to the Statewide Assessment, Oklahoma’s data indicate that the State is failing in the following measures: (1) placing and maintaining children in safe environments; (2) enabling children to remain safely in the home, when reasonable; (3) helping children in foster care and adoptive homes achieve timely permanency; (4) supporting adoptive families after placement and finalization; and (5) helping youth to prepare for independent living.

The Statewide Assessment describes services to court-involved families as being provided directly by OKDHS staff, such as casework services, family support, emergency shelter, and foster care. Other purchased placement services such as emergency and TFC, inpatient, residential treatment, and specialized independent living homes are monitored by the Oklahoma HCA (Medicaid-related), Child Care Licensing, CQI, and CFSD contract monitors. Parent education and sexual abuse treatment services are contracted services available in a limited number of counties and are monitored through CFSD program staff. Parent education and parent aide services for Spanish-speaking families also are available in Oklahoma County. OCS programs, with coverage statewide, are monitored through agency liaisons and CFSD program staff.

The Statewide Assessment reports that the CQI staff interview caseworkers, service providers, client families, foster parents, and judges regarding the service array and assist in the case review process, which also identifies needed services and effectiveness. For example, approximately 83 percent of CW staff surveyed in 2006 and 2007 believed services were accessible to address domestic violence, substance abuse, parenting skills, mental health (for parents and children), and family counseling within their communities. However, a smaller percentage of these CW staff, 57 percent, indicated the services to be effective.

The Statewide Assessment reports the following service gaps according to focus groups and surveys:

- The demand for services exceeds resources and results in waiting lists for services and insufficient placement resources.
- There are workforce concerns such as low pay, high caseloads, and staff turnover.
- The lack of qualified providers impacts timeliness and competency in resource provision.
- Dental and medical services are difficult to access in rural communities for children and parents relying on Medicaid.
- There is a lack of funding for services.
- Families continue to present with more complex needs, including substance abuse, depression, domestic violence, and mental illness requiring expert therapeutic intervention that is difficult to obtain statewide.
- There is a need for Spanish-speaking service providers, rural health services, and residential substance abuse programs for families with children, as well as programs that are effective in treating methamphetamine abuse, domestic violence, and autism.

### **Stakeholder Interview Information**

Stakeholders commenting on this item varied in terms of the array of services. Some felt they were more sufficient than others; however, most agreed there are multiple service gaps and shortages.

Stakeholders described CHBS, which serves families in the prevention program and families whose re-unification cases have been closed by DHS. However, it was noted that in some counties there are waiting lists for CHBS services, and it is unclear if families are monitored while they wait for services. Stakeholders describe services for voluntary in-home cases as being sufficient. The caseworker and the family meet with the referral agency and discuss available services that can be provided to the family. In the first visit, the caseworker completes a safety assessment and reviews referral information. Parent aides are contracted to prevent placement and stabilize families, with a focus on accessing community resources for families. Stakeholders report that flex funding is available in every county to assist parents with paying for needed services or services the court has mandated; however, some stakeholders noted that these funds are sometimes exhausted. In these instances, parents are expected to pay for resources like parenting classes and counseling. They also report that DHS does not have contracts in place for all services that are ordered by the court, such as psychological testing, drug testing, and parenting classes in all areas of the State. Stakeholders describe primary prevention programs, such as Healthy Families and Sooner Start, being available across the State and providing families with referrals to needed services.

Several stakeholders report that there is a lack of drug treatment centers, and children are being sent to Texas and Florida for drug treatment. They report a 2-3 month waiting list for parenting classes, there is only one family violence program, and there is confusion about payment for these services. One stakeholder reported that when children are sent home mental health services stop, and this affects successful re-unification. In Muskogee County, several stakeholders referenced Monarch, an inpatient substance abuse program for women, as being an excellent resource and a women's shelter that offers services to women, children, and batterers.

Stakeholders described the Fostering Hope Clinic for health services and how they are working to improve accessibility of services by locating more providers who are willing to take Medicaid. They received a grant from the American Academy of Pediatrics to conduct

focus groups and surveys throughout the State to determine need. They plan to develop networks of preferred providers, including physical and mental health providers from across the State that will serve children in foster care. These providers would use eKIDS to enter the child's information from the medical, dental, or mental health visit. Fostering Hope would give providers support and assistance, including guidelines on medication management for psychotropic drugs, how to complete a mental health screening, etc. Stakeholders from the State also describe a task force that works with the HCA to raise reimbursement rates in order to recruit more providers, particularly in rural areas. Stakeholders describe a period when the focus had been on dentists, and now they report having many more dentists available.

In terms of services for foster parents, several stakeholders report during the onsite CFSR that respite care is not available. Stakeholders also indicated the lack of TFC. Therefore, children are placed in congregated care, and, as a consequence, there are many youth who go in and out of shelters or go Absent Without Official Leave (AWOL). Stakeholders noted that congregated care is used too frequently.

Stakeholders indicated that it is difficult for Tribes to access services from contracted providers due to contract stipulations that DHS has with service providers. While Tribes/Nations can provide many services to families, a lack of collaboration with DHS causes issues with accessing services. Stakeholders describe IL services as more than adequate in terms of collaboration with Tribes/Nations.

In terms of older youth, stakeholder comments were mixed. Some stakeholders describe IL services as good. In particular, they describe cooking classes, workshops on life skills, Chafee Medicaid, and tuition waivers for college if the child has been in foster care at least 6 months after they turn 16 as strengths of the program. However, others report that youth are not always aware this is available to them, and caseworker turnover and caseworkers not initiating services for teens can be a challenge in terms of older youth.

**Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP**

Strength       Area Needing Improvement

Item 36 is rated as Area Needing Improvement. Although the State addressed accessibility issues in its PIP by developing a resource directory, increasing specialized services, and participating in a Casey Breakthrough Series Collaborative (BSC), the Onsite Review has identified a lack of services in all areas of the State to meet the needs of families involved with DHS. This item was rated as Area Needing Improvement in the State's 2002 CFSR.

**Statewide Assessment Information**

A majority of stakeholders commenting on this item during the onsite CFSR concurred with the barriers outlined in the Statewide Assessment. According to the Oklahoma Statewide Assessment, all services are not available statewide. Rural areas continue to

experience scarcity of services, as well as few specialized or quality services, and they often lack the resources necessary to provide services. Oklahoma is largely rural, which presents problems in recruiting qualified service providers. Also, the service system has not kept pace with the rapid growth of the Latino and Asian populations, and there are insufficient numbers of providers who speak these languages. Families lack personal transportation, and Oklahoma has poor public transportation systems. Cost to families is generally not a concern as most CW services are provided free of charge. Specialized services, such as sexual abuse treatment and evidenced-based therapies, are only available in metropolitan counties. Southeastern Oklahoma, among the poorest areas of the State, is most likely to have access problems. However, the far northwest area of the State, though wealthier, is sparsely populated, and residents in that area must travel great distances to access services.

### **Stakeholder Interview Information**

There was general consensus among stakeholders that availability of key services varies across the State. The common opinion expressed was that although there is a large array of services available in the larger urban areas, such as Oklahoma City and Tulsa, there is a dearth of services in the rural areas. One stakeholder noted that some areas of the State no longer have an orthodontist available in the community or even a basic parenting class. Several stakeholders indicated that children and families who do not reside in major urban areas must travel long distances to access services, and those in more urban counties report that public transportation and transportation in general is one of the largest barriers in accessing services. Additionally, it was noted by stakeholders that there are not enough service providers who offer sliding scale fees for services and who speak Spanish.

### **Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency**

Strength       Area Needing Improvement

Item 37 is rated as an Area Needing Improvement. OKDHS does not consistently individualize services to meet the needs of children and families. Service plans are often considered generic or “cookie cutter.” This item was rated as Area Needing Improvement in the State’s 2002 CFSR.

### **Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, the caseworker and family develop the initial treatment and service plan with participation or input from the parent(s); legal guardian; placement provider; child, when appropriate; child's attorney; and GAL, when applicable.

In preparation for the Statewide Assessment, the agency interviewed 10 judges and 14 district attorneys throughout the State. As part of the survey, these officials were asked to rate how well CW staff identify services in case plans that are based on individualized needs, not just on services generally available. Of those that responded, 75 percent indicated that services are individualized in case plans “always” or “almost always.” The same survey question was provided to CASAs and Multidisciplinary Team members. Of

those that responded, 61 percent indicated that services are individualized in case plans “always” or “almost always.” Of the CW staff that responded to the survey question, 88 percent reported that services are based on the families’ individualized needs. Finally, 83 percent of the Tribal caseworkers surveyed all indicated that services in case plans are individualized. Local judges, district attorneys, and private contractors through systemic reviews conducted by CQI staff and individual case discussions are pointing to the need for better, more specialized services. The Court Program Improvement Plan progress report (August 2006) indicates “moderate progress” on the following recommendation; “DHS and the court should continue to strive toward more individualized treatment plans. They should clearly delineate behavioral and other applicable goals, be stated in terms that permit observation and measurement, and contain specific target dates where applicable.”

The Statewide Assessment describes that, although policy directs the caseworker to include the family and pertinent individuals into the treatment planning process, the reality is that caseworkers often fail to engage families in this process. Without family involvement it is difficult to individualize services to families. If the family chooses not to participate, caseworkers are still responsible for creating individualized service plans and do so without the participation of the family. The current CW treatment plan, the ISP, was implemented after the Federal CFSR to provide a more family-friendly planning tool; however, caseworkers do not always engage families in the process, and service availability appears to drive treatment planning. For voluntary families, service planning consists of a Voluntary Family Service Agreement based on the CPS Safety Assessment.

### **Stakeholder Interview**

There were differences of opinion among stakeholders commenting on this item during the onsite CFSR. Several stakeholders voiced concern that the agency is not consistently effective in individualizing services to meet the unique needs of children and families. They noted that many case plans are “cookie cutter” plans in terms of services and are not individualized, particularly independent living plans, and caseworkers are not aware of the range of services available. Stakeholders reported the ability to individualize services often relies on the experience of the caseworker as well as the supervisor. Stakeholders report seeing plans that are developed around the services available in the community as opposed to the individual needs of the child and family. Tribes report the courts may be reluctant to utilize available Tribal services to address individual needs. Contract services, though generally more effective, also were described as inconsistent, unavailable due to transportation issues or waiting lists, and contractors were not always held accountable for individualizing services. There are limited funds to pay for services to address basic needs such as payment for rent and utilities.

By contrast, some stakeholders in all three of the counties included in the onsite CFSR expressed the opinion that caseworkers are effective in meeting the unique needs of children and families, although several noted that this sometimes varied depending on the experience of the caseworker. They cited the use of flex funds as supporting staff in individualizing services when available; however, in some counties these funds are very limited. Stakeholders described contractors as more effective in individualizing services, in particular CHBS and the use of the Family Inventory of Needs. Stakeholders attributed the individualization of services to the use of Family Group Conferencing; however, this is not used in all cases because of the resources needed to facilitate this process.

**VI. AGENCY RESPONSIVENESS TO THE COMMUNITY**

<b>Rating of Review Team Regarding Substantial Conformity</b>				
Rating	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
	1	2	3X	4

**Status of Agency Responsiveness to the Community**

Oklahoma is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. The State was found to be in substantial conformity with this systemic factor in its 2002 CFSR. Findings with regard to the specific items assessed for this factor are presented below.

**Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with Tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP**

Strength       Area Needing Improvement

Item 38 is rated as an Area Needing Improvement. The State does not consistently involve stakeholders in IV-B planning and progress reports outside the planning and preparation of the CFSR. The CFSP has been primarily developed by the program administrators within OKDHS. This item was rated as a Strength in the State’s 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, policy requires that Tribes are notified when OKDHS is involved with a Tribal family, and there are 37 recognized Tribes in Oklahoma. OKDHS has signed Tribal/State agreements with 35 Tribes in Oklahoma addressing foster care, adoption, and TFC. OKDHS has nine Tribal liaisons throughout the State and a Tribal liaison dealing exclusively with Tribal issues in the State office. The Tribal liaison, in cooperation with the Tribes, conducts CFSRs and develops PIPs based on the outcomes from the Tribal CFSR. Many Tribal staff have participated as reviewers at various individual sites for the State CFSR. The Tribes are included in the planning and participation for the Chafee Foster Care Independence Program and have been included in the Statewide Assessment Team.

In an effort to engage internal and external stakeholders, OKDHS organized a series of seven meetings to discuss how OKDHS can improve CW practices, and the result is the OKDHS CW Practice Standards. These meetings included 651 workers and supervisors in

all six areas of the State to discuss the OKDHS CW Practice Standards. Each county has developed a Practice Standards Improvement Plan with the focus on improving practice at the line level and, therefore, improving outcomes for families and children.

As indicated in the Statewide Assessment, OKDHS conducts ongoing systemic interviews to solicit input from foster parents, judges, district attorneys, CASAs, PARB, youth, and service providers. In preparation for the Statewide Assessment, the OKDHS CQI unit has conducted interviews with 355 foster parents, 10 judges, 14 district attorneys, 35 CASA members, and 46 Multidisciplinary Team (MDT) members. The CQI unit also surveyed 210 youth. The Independent Living (IL) Program surveys youth involved in that program, and 357 of these surveys were used to inform the Statewide Assessment. Youth, service providers, parents, placement providers, and caseworkers are surveyed via mail and at the time of the State CFSR. Results of the mail-in surveys have been included in various items throughout the Statewide Assessment.

### **Stakeholder Interview Information**

According to stakeholders, the State has not consistently utilized and involved stakeholders on a consistent basis outside the Statewide Assessment and CFSR. Stakeholders report that collaboration remains a challenge with the court system but is improving. Stakeholders reported that the courts are not involved with IV-B planning nor do the courts understand what a CFSP includes. Stakeholders reported that the CFSP is mostly developed by the program managers and program specialists in the State office of OKDHS.

Stakeholders commenting on this item agreed that the Statewide Assessment development included many stakeholders, and they plan to continue an inclusive process for the development of the next Annual Progress and Services Report (APSR) in June 2008 and the next CFSP in June 2009. The relationship between DHS administration and the Court Improvement Project (CIP) is described as good. CIP participates in the Statewide Assessment planning group and quarterly meetings of the Juvenile Justice Oversight Committee, and they also have been invited to participate in local planning meetings in six areas of the State.

Stakeholders' opinions varied with regard to working relationships with Tribes in the State. Some describe the State office as responsive, but collaboration at the local level is not as good. Some stakeholders at the State level did not feel that DHS engages Tribes in consultation or involves them in the CFSP process. In terms of training, stakeholders report that Tribes do not receive timely information about training, and DHS no longer has slots specifically for Tribes because the Tribes did not consistently participate in training. Other stakeholders report the Tribal/State workgroup and Oklahoma ICWA meet monthly, DHS is considering making adjustments to core training, and other recommendations from this group are being considered.

Other relationships noted by stakeholders include quarterly consultation with TFC and counseling agencies; the development of a Memorandum of Agreement (MOA) with Fort Sill; and ongoing consultation with law enforcement, CASA, PARB, and the district attorney's office. Stakeholders also describe collaborations with OUHSC, the Department of Mental Health, the Oklahoma Medical

Center, and the Child Advocacy Center. Stakeholders in Muskogee County describe DHS' ongoing consultation with the courts, with the child and family advocates, and the Tribes.

**Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP**

Strength       Area Needing Improvement

Item 39 is rated as a Strength because the State has consulted with external stakeholders in annual reports of progress and services delivered following the CFSP, such as the development of the 2007 APSR and the Statewide Assessment. This item was rated as a Strength in Oklahoma's 2002 CFSR.

**Statewide Assessment**

According to the Oklahoma Statewide Assessment, the CFSP, the APSR, and the PIP correspond to one another. The PIP has been made the basis of measurement for the CFSP and APSR, and they use the State CFSR scores, Supervisory Case Reviews, and SACWIS reports to inform the APSR; therefore allowing OKDHS to measure the progress or lack of progress on specific items or programs that are being monitored. As part of Oklahoma's efforts to consult with representatives, the Statewide Assessment lists the following:

- The OKDHS CFSD participates as a member of the State Citizen's Review Panel (CRP), which meets monthly.
- The State Adult Independent Living (IL) Advisory Board has a mission to lend support to implementation of IL services in Oklahoma. The board meets quarterly with task force groups meeting on an as needed basis. Three of the four committees developed in FY 05 to focus on critical needs identified by the State IL plan have been disbanded due to the goals being accomplished.
- The State Youth Advisory Board is a group of youth and adults working together to educate the community, empower youth for success, improve the CW system through problem solving, promote independent living through training and resources, and bridge the gap between youth and adults.

**Stakeholder Interview Information**

Stakeholders reported providing input in the 2007 APSR and involvement in the development of the Statewide Assessment for the 2007 CFSR. Stakeholders report monthly meetings for collaboration, planning, and development with courts, district attorneys, service providers, and CASAs in regards to services provided within the CFSP. The coordinators with the CIP were involved in the Statewide Assessment planning group and also collaborated with the State during Juvenile Justice Oversight Committee meetings according to stakeholders. Stakeholders also discussed the improvement in medical care for children due to the planning and coordination between OKDHS and the OUHSC, which led to the development of the Fostering Hope Clinic.

**Item 40. The State’s services under the CFSP are coordinated with services or benefits of other Federal or Federally assisted programs serving the same population**

  X   Strength                           Area Needing Improvement

Item 40 is rated as a Strength. DHS has many efforts in place to coordinate services and benefits between CW and other Federal or Federally assisted programs. This item was rated as a Strength in the State’s 2002 CFSP.

**Statewide Assessment Information**

The Statewide Assessment infers that the State coordinates with the following entities:

- Oklahoma Health Care Authority (OHCA)
- CIP
- Child Support Enforcement (CSE)
- The State Medicaid agency

**Stakeholder Interview Information**

Almost all stakeholders reported that there was good coordination of services between DHS and other agencies and community services, particularly those that operated with funding support from the Federal Government. Stakeholders identified the same coordinated efforts and agencies that were noted in the Statewide Assessment also described coordination as successful due to the number of Federally assisted programs located in the same building. They have co-located child support enforcement staff in the CW department, for example. Other services that DHS has coordinated with include the Partnership for Children’s Behavioral Health, Transitional Youth Projects, the Health Department, the Department of Mental Health, Substance Abuse Services, the Fostering Hope Clinic, the Transitional Compensation program for military families, and the National Resource Center for Youth Services. In particular, the collaboration with the child abuse prevention program with the Health Department was noted as being a strong collaboration with DHS. Stakeholders in Muskogee County described strong collaboration between the agency and the community programs that serve the same population, in particular, the Health Department, school system, and the Social Security Administration. In Oklahoma County, stakeholders report collaboration with HCA, which enables doctors, foster parents, and children to access their medical records within 24 hours. The Fostering Hope Clinic is working with DHS to increase children’s access to health care through Medicaid. In addition, the Fostering Hope Clinic has joined with DHS and Medicaid to enter all services provided through Medicaid to children and youth in foster care into a computer; youth exiting care are given a copy of these records to bring to future providers. Finally, the Transitional Youth Project is being piloted in six sites across the State and is described by stakeholders as a collaboration between Mental Health, DHS, Vocational Rehab, and the Housing Department to work with youth who are aging out of the system.

Despite these examples of coordination, some stakeholders describe relationships between agency staff and providers as adversarial; some report Federal program providers would prefer to meet with DHS monthly, but meetings occur infrequently.

**VII. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION**

<b>Rating of Review Team Regarding Substantial Conformity</b>				
Rating	<b>Not in Substantial Conformity</b>		<b>Substantial Conformity</b>	
	1	2	3 X	4

**Status of Foster and Adoptive Parent Licensing, Recruitment, and Retention**

Oklahoma is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention. During the 2002 CFSR, Oklahoma was found to be in substantial conformity with this factor. Findings with regard to the specific items assessed for this factor are presented below.

**Item 41. The State has implemented standards for foster family homes and child care institutions which are reasonably in accord with recommended national standards**

Strength                       Area Needing Improvement

Item 41 is rated as a Strength. OKDHS has implemented comprehensive standards and policies for foster family homes and child care institutions. This item was rated as a Strength in the State’s 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment:

- All foster care providers and adoptive families are required to attend pre-service training before becoming approved to receive reimbursement through Federal funds (IV-E and IV-B). Criminal background checks include fingerprints. OKDHS has been completing criminal background checks since September 1998. Juveniles within the home between the ages of 13-18 have searches within the Juvenile Justice Information System. They are in the process of amending State statutes to reflect the requirements of the Adam Walsh Act to fingerprint all foster and adoptive applicants regardless of their length of residency.
- Contract monitoring of emergency shelters, TFC providers, and group home providers is conducted by the CQI unit, and the area caseworkers provide ongoing monthly monitoring.
- OKDHS contracts with private agencies for the majority of its foster and adoptive home assessments, which increases the completion time for OKDHS staff to approve the foster and adoptive families. With the implementation of OKPRIDE, the home study process includes an assessment to provide foster care and adoption services.

- By policy, a child is referred for a statewide adoption when the child’s permanency plan becomes adoption, unless there is an identified family member. This allows for consideration of families across the State.

**Stakeholder Interview Information**

Stakeholders commenting on this item during the Onsite Review were in general agreement that the State’s licensing procedure involves standards for foster family homes and child care institutions that ensure the safety of the children in out-of-home placements. These licensing standards were described as comprehensive in that they address health and safety issues, employee qualifications, education and training requirements, sanitation issues, fingerprinting, background checks, and a thorough review of the physical condition of the home. They are in the process of developing a dual home study that can be used as both foster and adoptive home care.

**Item 42. The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds**

  X   Strength                      \_\_\_\_\_ Area Needing Improvement

Item 42 is rated a Strength because Oklahoma applies standards to all licensed or approved foster family homes or child care institutions. This item was rated as a Strength in the State’s 2002 CFSR.

**Statewide Assessment**

According to the Oklahoma Statewide Assessment, all resource family homes, foster care, adoption, emergency foster care, and TFC homes are approved based on OKDHS CFSD and OKDHS Office of Child Care policies. Title IV-E or IV-B funds are only expended for homes that meet these standards. Pre-service training is required of all families receiving reimbursement from title IV-E or IV-B funds. Criminal background checks of foster family applicants are completed via fingerprints. Resource home approval, pending applicant fingerprints, occurs when applicants have resided in Oklahoma a minimum of 5 years. Resource families, in some cases, are jointly approved by other licensed child placing agencies, other OKDHS divisions, or Tribal partners.

The Statewide Assessment reports that a child can be placed in a kinship family setting prior to completion of the resource family assessment and pre-service training. Kinship placement is dependent on completion of an initial kinship placement agreement, criminal background check, CW records search, physical house assessment, and contact with three personal references.

**Stakeholder Interview Information**

There was consensus among stakeholders commenting on this item during the onsite CFSR that nonrelative foster parents and pre-adoptive parents have the same requirements and training; however, there can be waivers for kinship homes. Home studies are completed by contracting agencies. Stakeholders noted that there are licensing exceptions made for kinship homes that are not allowed

for adoptive homes. An example was given of a child sleeping in a living room as opposed to a bedroom. Stakeholders noted the need for more training to county directors on what types of waivers can be approved and what should not be approved. They also noted that as part of the CQI process when State program staff review cases, they review the waivers that have been granted. Reassessments of foster parents are completed annually and stakeholders report that the agency is doing a better job at reassessing in a timely manner. An issue described by stakeholders is foster parents are not all getting their 10 hours of annual training. There are no provisional licensing standards. Stakeholders reported that although relatives have to go through the same process as other applicants in terms of training and background checks, they can have a child placed with them without being licensed.

**Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children**

Strength                       Area Needing Improvement

Item 43 is rated as a Strength because Oklahoma has required national criminal background checks since 1998 for all foster and adoptive homes and group home providers. This item was rated as a Strength in the State's 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, Oklahoma has required national criminal background checks since September 1998 and has been in full compliance with Federal requirements for over 8 years. Criminal background checks are currently being provided via a national search of applicant fingerprint data bases conducted by both the Oklahoma State Bureau of Investigation (OSBI) and the Federal Bureau of Investigation (FBI). Background checks completed include a search of Oklahoma Department of Public Safety (DPS) records and the Oklahoma Sex Offenders Registry. Searches are completed of the Juvenile Justice Information System for all resource home residents age 13 through 18 and an OKDHS CW records search is completed for all adults living in the home. Court involvement and public information data bases are reviewed for all adults residing in the applicant home. Children can be placed in kinship home settings upon completion of the OSBI criminal and name search and the CW record check.

The Statewide Assessment reports that all foster and adoptive applicants will be fingerprinted regardless of length of residency prior to application. In addition, all contracted care providers, emergency foster care, TFC, and group home providers meet the same policy guidelines for criminal background checks as do OKDHS resource families. OKDHS Office of Child Care monitors the completion of criminal background checks of staff in institutions. The key collaborators with the agency are OSBI, FBI, and DPS.

**Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR concur with the Statewide Assessment that the State has been doing State police background checks and fingerprint checks. Stakeholders describe the State as diligent in completing criminal background

checks. In residential facilities, all employees and volunteers must be fingerprinted, in addition to everyone in the home 18 years or older. Stakeholders reported it taking 8 weeks to get finger print checks, and in some instances, they have prints that are unreadable and have to send them to the FBI to be manually read. However they anticipate doing training with staff on fingerprinting in order to decrease the rejection rate.

**Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed**

\_\_\_\_\_ Strength        X   Area Needing Improvement

Item 44 is rated as an Area Needing Improvement. While OKDHS has a plan in place for recruiting families to meet specific needs of children, there is still an identified need for more foster homes, particularly for Hispanic children and older youth. In addition, there is an over use of emergency shelter care for children of all ages due to the lack of homes. This item was rated as a Strength in the State’s 2002 CFSR. This item was a strength in the State’s 2002 CFSR and OKDHS voluntarily addressed recruitment in their PIP. OKDHS chose to implement PIP activities to increase the number and diversity of their foster and adoptive home resources. The diversity of homes also was to include recruitment of Native American and Spanish-speaking foster homes.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, OKDHS policies and contract language are consistent with Federal laws and guidelines regarding resource development and placement in a culturally competent manner. Specific policies regarding diligent recruitment, which reflects the ethnic and racial diversity of children in foster care are also in place, however, the Statewide Assessment notes that there is a need to recruit foster families based on the specific needs of children. CFSR program staff initiated a monthly recruitment meeting attended by foster care and adoptive specialists statewide to address the need for specific and targeted recruitment of families who reflect the State’s placement needs. Current representation and participation includes resource family specialists from the State, emergency foster care agency staff, TFC agency staff, Tribal partners, and resource parents providing both foster and adoptive care, permanency planning program staff, and CQI CFSR program staff. At these meetings, strategies and tools are shared and developed for increased recruitment and enhanced support of resource families.

As part of the PIP developed following the last Federal CFSR, each county identified the children they had in foster care and developed recruitment strategies. The identification and utilization of consultants from the National Resource Centers and AdoptUsKids has proven to be an integral part of statewide recruitment efforts. One Church One Child, AdoptUsKids, Adoption Exchange, Child Shelter Homes: A Rescue Effort (Child S.H.A.R.E.), Tribes, and the National Resource Center for Youth Services are all key collaborators in resource family recruitment. The use of consultants by OKDHS for program development and training at statewide recruitment meetings has given staff both in the field and in State office exposure to emerging practice and allowed for

piloting and field testing a variety of practice approaches. OKDHS has continually contracted with the One Church One Child program for the recruitment and support of African-American families for foster care and adoption.

The Statewide Assessment reports there are varied levels of understanding among many staff of the need to implement diligent targeted recruitment to reflect the children in the system rather than just recruiting families. This lack of understanding also is evident with other entities that provide out-of-home care. Additional training in this area is a need as collaboration with external stakeholders is crucial in accomplishing targeted recruitment goals. The Statewide Assessment describes the need for OKDHS to partner with Tribes in recruiting Native American homes to meet the needs of the Native American children in the system. OKDHS has recognized the need to collaborate with additional external stakeholders.

### **Stakeholder Interview Information**

Stakeholders reporting on this item during the onsite CFSR report that there is a Statewide Recruitment and Retention Committee that meets monthly and includes representatives from the Tribes and faith based organizations. Stakeholders describe recruitment efforts including asking foster parents to recruit in their counties, DHS going to churches to recruit, TV ads and billboards, and an 800 number to call for prospective foster and adoptive parents. Several stakeholders noted that foster parents are the best recruiters. All but one area of the State have at least a part-time person dedicated to recruitment, and each area also receives small amounts of funding for recruitment and retention activities. Some stakeholders also noted that children are registered for adoption on national and local sites, and recruitment efforts with One Church, One Child activities, AdoptUSKids and Heart Gallery are taking place in the community.

The majority of stakeholders commenting on this item during the onsite CFSR expressed the opinion that there is a need for foster homes statewide. They also reported that there is a need for foster homes for Hispanic children and particularly for adolescents. Stakeholders noted that Tribes recruit, license, and train their own foster parents, and they cited the need for improved communication between the State and the Tribes. Stakeholders also report that Tribes would prefer OKDHS to train and license Tribal homes due to a lack of Tribal funding. Despite efforts described by some stakeholders, others report not seeing signs of recruitment activities. Stakeholders noted that foster parents make the best recruiters and, therefore, it is important to ensure that foster parents' needs are met. They noted that DHS does not consistently treat foster parents as valued resources, and this prevents them from recommending friends and family members. As indicated in the Statewide Assessment, stakeholder interviews during the onsite CFSR revealed that there is more emphasis on recruitment than on retention of families. While kinship/relative homes are more easily recruited, there is not an effort to retain these homes as active foster homes.

**Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children**

Strength

Area Needing Improvement

Item 45 is rated as a Strength. The Statewide Assessment and onsite review found that OKDHS is very diligent in using crossjurisdictional resources to locate placements for waiting children. This item was rated as a Strength in the State's 2002 CFSR.

**Statewide Assessment Information**

According to the Oklahoma Statewide Assessment, Oklahoma policy states that a child in OKDHS custody is referred for statewide adoption staffing when the child's permanency plan is adoption, unless a prospective caregiver has been identified for the child. The statewide staffing allows for recommendation and consideration of families from the entire State for each child staffed.

Strengths outlined in the Statewide Assessment include:

- This past year OKDHS identified adoptive resources within the military community through AdoptUSKids.
- OKDHS contracts with Heritage Family Services to monitor the ICPC process for outgoing and incoming adoptive placements. Heritage Family Services is effective in complying with new Federal timeframes for the completion of the home assessment and in preventing delays.
- OKDHS Contractors are required to complete and have the home assessments back to OKDHS within 45 days in order for the State to meet the 60 day timeframe.
- One Church One Child recruits families for minority children and attends the monthly statewide staffing so their families can be recommended and considered for children waiting for permanent homes. Approximately 20 Tribes have participated in statewide staffings to recommend families for Tribal children.
- The "Waiting Child" television segment, the Heart Gallery Photo Exhibit, and AdoptUSKids recruitment venues are utilized extensively to identify resources from across the country.
- The adoption specialist works with out-of-State inquiries and recruitment of resources for waiting children including AdoptUSKids and the Adoption Exchange for child specific recruitment.

**Stakeholder Interview Information**

Stakeholders commenting on this item during the onsite CFSR noted there is a process in place to use crossjurisdictional resources, and for the most part, Oklahoma does a good job processing the ICPC requests they receive, and they place a strong emphasis on the adoption of children both out-of-county and out-of-State. They suggested that going through ICPC is generally a smooth process, and DHS staff does a good job taking responsibility for services to the family in the interim. Stakeholders reported that the agency often uses AdoptUSKids, Heart Galleries, and some TV broadcasts that go to neighboring States to assist in finding adoptive placements. In

the case of international adoptions, several stakeholders reported that while this is not common the home study would be completed by a military worker overseas and the DHS worker would accompany the child to the overseas destination. In Comanche County it was noted by stakeholders that the county makes heavy use of crossjurisdictional placements, in particular with military cases from Ft. Sill and the need to place with relatives outside of the county. A stakeholder from Muskogee County described a good working relationship with Texas in terms of crossjurisdictional placements.