



COLORADO
Office of Children,
Youth & Families
Division of Child Welfare

2020 COLORADO PROGRAM IMPROVEMENT PLAN

IN RESPONSE TO THE 2017 CHILD AND FAMILY SERVICES REVIEW



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Introduction

Colorado has 64 counties and 22 judicial districts combining urban, suburban and rural communities, as well as resort communities with seasonal fluctuations. Colorado has an overall population of just under 6 million and growth has been robust since 2010. The population growth rate for Colorado is 1.7 percent, which is the seventh fastest growth rate in the country. Population data shows that urban counties (El Paso, Denver, Douglas, Arapahoe and Adams) are increasing while small rural communities are showing population declines. The only exception to that trend is an increase in population for Weld County which is a large county with significant rural areas. Colorado is a state-supervised and county-administered human services system. Under this system, county departments are the main provider of direct services to Colorado's families. The State's responsibilities include oversight of Title IV-E and IV-B plans, rule promulgation, guidance and program oversight, and monitoring of county performance and practice. Colorado Revised Statute (C.R.S. 26-1-118) states that county departments shall serve as agents of the state department.

The Colorado Department of Human Services (CDHS) Division of Child Welfare (DCW) is one of five divisions/units within the Office of Children, Youth and Families (OCYF), which consists of DCW, the Division of Youth Services (DYS) (state-administered youth correctional facilities), the Domestic Violence Program (DVP), the Medical Oversight Unit, and the Juvenile Parole Board. OCYF is under the oversight of the OCYF Director, who reports to the Executive Director of CDHS.

Authority

CDHS has the responsibility to draft rules to operationalize state statute. Rules are promulgated by the CDHS State Board. The State Board of Human Services was created pursuant to C.R.S. 26-1-107. This is a rule-making body that holds hearings related to the formulation and revision of the policies of CDHS. Its statutory duties include adopting rules for programs administered and services provided by CDHS, which govern program scope and content; requirements, obligations and rights of clients; adopting non-Executive Director rules concerning vendors, providers and other acts of the State Department; and, any other specific statutory provisions granting rule-making authority in relation to specific programs.

DCW monitors statewide county child welfare practices to ensure alignment with statute, rule and memo series guidance. Utilizing subject matter experts, DCW provides practice feedback, technical assistance and practical guidance to county staff. DCW intermediary staff are assigned to each county and provide support for Continuous Quality Improvement (CQI) processes. When counties are unable to meet performance measures based on statute and rule, DCW works with those specific counties to create performance improvement plans to improve practice.

Communication Processes

CDHS communicates with county partners through a formalized memo process, known as the Memo Series, designed to streamline and clarify CDHS policies and expectations of county partners and contracted entities. There are three types of memos: an information memo conveys important information for the counties that is strictly informational and timely (e.g., availability of grants that counties can apply for, posting of a request for proposal, etc.); an operation memo provides detailed instructions/clarifications for counties to operationalize a new/existing state law, new/existing federal law, new/existing state rule or new/existing federal rule; a policy memo changes CDHS policy as a result of CDHS' statutorily defined responsibility to supervise counties.

DCW and representatives from county child welfare agencies meet on a monthly basis. This group is the SubPolicy Action Committee (Sub-PAC). The purpose of the group is to review policies and practices for child welfare across the state. Following the approval of the Program Improvement Plan (PIP) by the Children's Bureau, a quarterly PIP update will be provided to the group to ensure that they are aware of practice changes and modifications that will be implemented statewide. In addition, updated information on the progress of the PIP will be posted on CDHS/DCW website and information will be updated on a quarterly basis.

Quality Assurance Processes

The Administrative Review Division (ARD) serves as an independent third-party review system under the auspices of CDHS. ARD is the mechanism responsible for the federally required Case Review System and a portion of the Quality Assurance System for both DCW and DYS. With an ultimate goal of providing permanency and well-being for Colorado's child(ren)/youth, ARD works closely with Colorado's counties to measure and assess adherence to state and federal regulations.

ARD conducts three types of reviews to inform Colorado's child welfare system: Out-of-Home (OOH); In-Home (IH); [and] Quality Assurance (QA).

ARD Out-Of-Home (OOH) reviews are scheduled at six-month intervals as long as the child/youth is in OOH care. Prior to the onsite review, an ARD reviewer reviews the case file in the Comprehensive Child Welfare Information System (CCWIS). The case file review is followed by an onsite review which families, youth, care providers, Guardians ad Litem (GALs), Court Appointed Special Advocates (CASAs) and other appropriate services professionals involved in the case are invited to attend.

Children and Family Services Review (CFSR)

In September 2017, the Children's Bureau, DCW and ARD collaborated to conduct an onsite evaluation for Colorado's CFSR. The CFSR examined Colorado's child welfare programs and practices to identify strengths and challenges with regard to safety, permanency and well-being outcomes of the child(ren)/youth and families served by the child welfare system. The review included the Colorado Statewide Assessment (submitted in August 2017), onsite case reviews (September 2017) and meetings with stakeholder groups that included over 120 partners (September 2017). Colorado received the state CFSR report on March 12, 2018 and began a process of statewide stakeholder involvement and collaboration to develop the following Program Improvement Plan (PIP).

The CFSR assessed the states performance with regard to substantial conformity with 7 child and family outcomes and for seven systemic factors. Each outcome incorporates 1 or more of 18 items included in the case review, each item is rated as a STRENGTH or as an AREA NEEDING IMPROVEMENT (ANI) and items are combined to determine if the outcome is a STRENGTH or ANI. Conformity with the systemic factors is based on information from stakeholder interviews and through the statewide assessment. The systemic factors are also rated as STRENGTH or ANI.

Seven systemic factors were measured based on the Colorado Statewide Assessment and stakeholder interviews during the onsite review. Two of the systemic factors were in substantial conformity:

- Quality Assurance System
- Agency Response to the Community

Five of the systemic factors were not in substantial conformity:

- Statewide Information System
- Case Review System - three of the five items were rated as a STRENGTH
- Staff and Provider Training - one of the systemic factors was rated as a STRENGTH
- Service Array and Resource Development - none of the three items were rated as a STRENGTH
- Foster and Adoptive Parent Licensing, Recruitment and Retention - two of the four items were rated as a STRENGTH

While Colorado recognizes that all of these findings are important, not all of the items will be addressed through the limited scope of the PIP. The following are the processes or ongoing methods for addressing systemic factors that were not in substantial conformity:

Statewide Information System (Item 19)

The Colorado Comprehensive Child Welfare Information System (CCWIS) (hereinafter referred to as Trails) application build included a state-commissioned system assessment performed by an independent third-party vendor. The results of the assessment supported the need to move away from the existing technology in order to support current and future needs of CDHS and its customers. CDHS contracted with a vendor in SFY 2013-14 for an independent analysis of Trails, which resulted in a recommendation to modernize the system to transition away from its current outdated technological structure. The new build is accomplishing this technological upgrade as well as providing the foundation for enhanced data interfaces associated with the interoperability project cofunded by the State of Colorado and the Case Management System (CMS) federal partner. This project will result in greater efficiencies for the workforce and will allow child welfare staff to make faster and better informed responses/decisions leading to improved safety, permanency and well-being for Colorado children, youth and families. The Trails Modernization project has had several delays, and as of April 2019, the projected completion date is currently planned for late calendar year 2020. Updates to the system will be reported in Colorado's Annual Progress and Services Report (APSR).

Case Review System (Items 20, 21, 22, 23, and 24)

The CFSR identified two areas needing improvement; Item 23 Termination of Parental Rights and Item 24 Notification of Hearings and Reviews. Delays in filing for Termination of Parent Rights (TPR) is partially addressed in Goal 4. In addition, DCW has been holding monthly meetings with the Court Improvement Project (CIP), the Office of the Respondent Parent Counsel (ORPC) and the Office of the Child's Representative (OCR) to promote

collaboration since March of 2019. The purposes of the meetings are to improve communication among professionals to caregivers and clients; and, to ensure practice alignment.

To address item 24, DCW has convened a Foster Parent work group to review rule and processes. The group will make recommendations for rule and practice changes to improve communication with these valuable partners. The progress will be reported in the APSR.

Staff and Provider Training (Items 26, 27, and 28)

Throughout FFY19, the Child Welfare Training System (CWTS) made a series of upgrades to the Learning Management System (LMS), automating the certification and recertification process and allowing the DCW Training Unit Staff to easily update the certification status in Trails. As of July 1, 2019, Colorado has fully implemented a state-level tracking process for initial and ongoing staff training, allowing real time access to a case worker's or a supervisor's certification status. A strategy to address this factor is included in Goal 5.

Colorado is one of eight sites across the nation selected to partner with the National Training and Development Curriculum for foster and adoptive parents (NTDC). Colorado is partnering with the NTDC team to develop and evaluate a state-of-the-art foster and adoptive parent training program to include intensive preparation and ongoing development components that reflect the capacities required of successful foster and adoptive parents. This project addresses ANI for item 28 and will be monitored and reported through the Child and Family Services Plan (CFSP) and the APSR.

Service Array and Resource Development (Items 29 and 30)

The CFSR found that Colorado was not in conformity with either the array of services (Item 29) or individualized services (Item 30). Information in the statewide assessment and collected during interviews with stakeholders showed that although the state provides a comprehensive service array through the child welfare agency's Core Services Program and has the ability to adapt and adjust these services through flexible funding, the service array is more accessible in the larger metropolitan areas than in rural areas of the state. Stakeholders reported a lack of affordable housing resources throughout the state, a lack of transportation services, and insufficient availability of substance abuse treatment and Medicaid-funded services. These issues are beyond the scope of this PIP. CDHS and the child welfare system will continue to support efforts to solve these larger issues.

Colorado is expanding the service array to: assess the strengths and needs of child(ren)/youth and families and determine needs; identify services to address individual child(ren)/youth's needs to create a safe home environment; expand services to enable child(ren)/youth to remain safely with their parents when reasonable; and, services that help child(ren)/youth in foster and adoptive homes achieve and maintain permanency. Through an ongoing contract with the Adoption Exchange, Colorado has focused on services for post-permanency (i.e. reunification, post adoption or guardianship) to reduce the number of families re-entering child welfare, particularly in rural counties. This is addressed in Goal 5.

Information in the statewide assessment and data collected during interviews with stakeholders showed that the state lacked the capacity to provide individualized services for families and child(ren)/youth throughout the state. Stakeholders reported that although Colorado has a Core Services Program, the state lacks the ability to individualize services for the child(ren)/youth and families served and that staff rely heavily on their own creative capacities to find services, and often those services do not meet the specific needs of the child(ren)/youth and families. Individualized services provided to families are detailed in the family service plan in Trails. Progress and updates will be reported in the APSR.

Foster and Adoptive Parent Licensing, Recruitment and Retention (Items 33, 34, 35, and 36)

Two of the four items in the systemic factor for Foster and Adoptive Parent Licensing, Recruitment and Retention was rated as a strength (Items 34 and 35), Colorado is not in substantial conformity with this systemic factor.

Information in the Statewide Assessment showed that the state has a process in place to issue foster care licenses and certifications. Although data regarding county-issued foster care home certifications and recertifications are available, data regarding child placement agency-issued foster care home certifications and Department of Child Welfare-issued licenses are not captured in a manner that shows whether the agency is applying standards equally to all certified foster care homes and licensed facilities (Item 33).

Colorado currently has two avenues for foster parent certification. The first is certification through a county department of human/social services, and the second is through a private or nonprofit Child Placement Agency (CPA). County foster homes are reviewed for compliance with rule and certification standards by the ARD. CPA foster homes are reviewed for compliance with certification standards through the Placement Services Unit of DCW.

DCW is requesting that the CDHS' Office of Performance and Strategic Outcomes, Division of Audits conduct an audit of the foster care home certification review processes for both CPA home and for county certified homes to

identify if standards are applied equally to all certified foster care homes and licensed facilities. The audit will be captured in Goal 5. Any results of the audit and any process improvement or modifications will be reported in the APSR.

According to information from the CFSR, Colorado needs to improve the timeliness of response to home study requests received from other states (Item 36). Common reasons for delays include lack of cooperation from the proposed placement homes, lack of employee resources, difficulty coordinating schedules, and delayed responses from placement homes and facilities. Colorado anticipates that the Trails Modernization project, enhanced training, and a focus on monitoring will lead to more effective cross-jurisdictional placements. This will be reported in the APSR.

CFSR/PIP Development

In preparation for the 2017 CFSR onsite review, DCW created the CFSR Oversight Committee consisting of stakeholders from a wide array of disciplines who met monthly to help prepare and inform the review. When Colorado received the CFSR report, the CFSR Oversight Committee transitioned to oversight of the PIP, including the development and review of strategies and activities.

Under the guidance of the PIP Oversight Group, subgroups were formed to investigate data and root causes and to recommend strategies related to the CFSR findings. Subgroups consisted of stakeholders including DCW staff, county departments of human/social services staff, ARD staff, foster parents, district judges, county attorneys, representatives of the CIP, Illuminate, Family Resource Centers, Disability Law Colorado, ORPC, CASA, Families First Colorado, Tennyson Center for Children, Project 1.27, Specialized Alternatives for Families & Youth (SAFY), Lutheran Family Services, The Adoption Exchange, Colorado State University, Mount Saint Vincent, OCR, CDHS/Office of Early Childhood (OEC) and the Colorado Department of Public Health and Environment (CDPHE). Subgroups averaged over 30 participants and met weekly for five to six weeks, producing recommendations foundational to the PIP. Further public input was sought via a feedback conference call held to review the subgroups' proposals. During the 2018 annual Colorado Convening on Children, Youth and Families a session to introduce the PIP and areas needing improvement was held. The session gave judicial partners and others and opportunity to provide feedback on PIP development.

Additional stakeholders from the judicial community were also consulted in development of the PIP. Courts and legal representation are an extension of the child welfare treatment team. Research has shown that strong, quality legal representation for child(ren)/youth and parents, appointed early in the child welfare process, can impact the number of child(ren)/youth placed into foster care and can expedite reunification and other permanency options. In Colorado, there are two systems for legal representation in a child welfare case, Respondent Parent Counsel (RPC) to provide representation to the parents and custodians in a child welfare action and the guardian *ad litem* (GAL) which is the attorney appointed to represent the child's best interest. Oversight of these representatives are under the Office of the Child's Representative (OCR) and the Office of the Respondent Parents' Counsel (ORPC).

The Office of the Child's Representative (OCR) is the state agency mandated to oversee legal counsel assigned to provide competent and effective best interests legal representation to child(ren)/youth involved in the Colorado court system. OCR was created by the General Assembly in 2000 to improve representation for Colorado's most vulnerable child(ren)/youth by establishing minimum practice standards and providing litigation support, accessible high-quality statewide training, and oversight of the practice. The OCR oversees attorneys that provide legal representation as guardians' ad litem (GAL), counsel for child(ren)/youth in dependency and neglect proceedings, and child legal representatives. In Colorado, a GAL is assigned to every child in a case and are a valued member of the team.

Respondent parent attorneys play a critical role in in dependency and neglect cases (also known as "child welfare" or "child protection" cases) by protecting the constitutional and other legal rights of parents, preserving family relationships, advocating for necessary services to support reunification and children remaining home, and ensuring the provision of complete, accurate, and balanced information to courts and other parties. In recognition of this critical role, the Colorado Children's Code affords parents who are respondents in a dependency and neglect case the right to counsel. On January 1, 2016, Colorado established the Office of the Respondent Parents' Counsel (ORPC) in order to support and enhance the quality of parent representation in dependency and neglect cases. In order to support parents and ensure that parents are identified and engaged in the D&N process, ORPC makes investigators available to respondent parent attorneys to locate and engage missing clients and kin. The ORPC also conducts statewide observations, training and support for respondent parent attorneys including access to qualified experts. The contractors engaged by the ORPC provide a voice of parents both in and out of the courtroom, safeguard parents' rights throughout the proceedings, inform courts and counsel of parental goals and suggest methods for meeting those goals, and create an information conduit between parents and other

stakeholders in the child welfare system. RPCs are an essential component of the child welfare team, and can provide information that may help engage parents in the system in more meaningful ways.

DCW also held two statewide family teleconference town hall meetings. Targeted outreach was conducted to solicit feedback from foster/kinship parents and parents/caregivers involved in the child welfare system within the last five years. In two separate meetings, groups were asked a series of questions about themes and also allowed participants to ask questions. DCW outreached to 2,794 Colorado foster/kinship parents via a teleconference town hall and 410 participated. The themes that emerged from this outreach was a need to increase the number of child(ren)/youth finding permanent homes; enhance foster/kinship parent training/support; include foster/kin parents in case planning; and offer additional ways to respond to child abuse and neglect allegations. In addition, DCW outreached to 10,634 parents/caregivers and 768 participated. The themes that emerged from this outreach was a continued need for parent/caregiver input in their case; significant reliance on extended family for support; importance of treatment programs for support; and a need for improved caseworker/parent relationships. The information gathered through the town halls provided valuable information for the PIP as well as for the development of the 2020-2024 CFSP.

Following the initial submission of the PIP and feedback from Children’s Bureau partners, stakeholders were included in revisions and updates to streamline goals and strategies and to provide additional data and analysis. DCW, PIP county representatives and CIP partners met regularly to identify data gaps, update data and analyze the results. The team revisited the original CFSR results, identified contributing factors and identified possible root causes. Root causes were further explored through ZOOM meeting focus groups and other ongoing work groups. Goals and strategies were streamlined with the consultation of the Capacity Building Center for States. Finally, the PIP Implementation team members reviewed each goal, strategy and activity to identify areas where the activities aligned with current practice and those that were new or expanded activities that required practice change. When the PIP has final approval, the PIP counties will develop plans to implement the goals/strategies, and create processes to monitor progress and make adjustments before evaluating outcomes. The PIP Implementation team will create a statewide roll out plan for those strategies that are successful in improving outcomes.

Selection of Measurement Sites

In order to identify a representative sample of Colorado, six county sites were selected to participate as implementation counties for the PIP. These counties will also represent Colorado in the measurement plan. County selection was made to provide a demographic and geographical cross-representation of counties, as well as a representation of program initiatives currently underway in Colorado’s child welfare system. The counties selected are Arapahoe, Denver, El Paso, Fremont, Larimer and Morgan. Arapahoe, Denver, El Paso and Larimer are among the ten “large” counties in the state, while Fremont and Morgan represent counties with fewer than 50,000 residents.

These six counties represent over 40 percent of the child population in the state, and a similar proportion of child welfare referrals, founded allegations, and in-home/out-of-home cases from 2018 data as indicated by Table 1:

CY 2017	Denver	Arapahoe	Larimer	El Paso	Fremont	Morgan
Percent of state child population	10.8%	12.1%	5.7%	13.5%	0.6%	0.6%
Percent of total referrals	12.7%	10.9%	6.6%	15.2%	1.1%	0.6%
Percent total founded allegations	14.3%	7.7%	2.2%	21.9%	0.6%	0.8%
Percent of total in-home cases	8.7%	15.3%	11.4%	12.4%	1.3%	1.1%
Percent of child(ren)/youth OOH	16.9%	7.3%	2.5%	13.7%	1.5%	0.5%

Table 1: Measurement site demographics

The six counties in the PIP Measurement Plan represent a range of program initiatives that were active across the state in 2018:

Program initiatives	Denver	Arapahoe	Larimer	El Paso	Fremont	Morgan
IV-E Waiver - Family Engagement	•	•	•	•	•	•
IV-E Waiver - Kinship Support	•	•	•	•	•	•
Collaborative Management Program	•		•	•	•	•
DANSR [Judicial Districts]	•	•		•	•	
Differential Response		•	•		•	
Relative Guardianship Assistance Program	•			•	•	•
Early Childhood Council	•	•	•	•	•	•

Table 2: Program initiatives by PIP County

The PIP counties provided feedback and consultation in the development of PIP goals, strategies and activities. One to three representatives from each county met on a monthly basis throughout the PIP development and will continue to meet throughout implementation phase to share successes and support each other. PIP counties are responsible for developing an implementation plan, monitoring outcomes to inform modifications and creating a statewide scaling plan for activities that are successful. In addition to the implementation of the goals and strategies, each PIP county will participate in a case review from a randomized set of cases. The review will be conducted by the ARD using the federal On-Site Review Instrument (OSRI). Results of the case reviews will be used to determine Colorado’s overall successful completion of the PIP.

Timely Response to Allegations of Child Maltreatment

Colorado statute provides authority for child protective services to respond to concerns of abuse and neglect. After a referral is received, a thorough assessment is the first step in ensuring that child(ren)/youth are safe. The dispositional timeframes (Immediate, Three (3) day, and Five (5) day) are determined based on the level of risk identified in the referral, and administrative rules operationalize the criteria for assigned timeframes based on the criticality in the nature of the report. Timely response to allegations of child maltreatment is an essential pillar to child protection services, not only to ensure the safety of child(ren)/youth but also to ensure that child protection is determining the appropriate level of involvement with a family with expediency.

Safety Outcome 1: Child(ren)/youth are, first and foremost, protected from abuse and neglect

- Colorado is not in substantial conformity with Safety Outcome 1.

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

- Colorado received an overall rating of AREA NEEDING IMPROVEMENT (ANI) for Item 1 because 25% of the 28 applicable cases were not in compliance with agency policies and state statutes related to timeframes for response to reports of alleged child maltreatment.

The Colorado Department of Human Services (CDHS) has implemented C-Stat, a management strategy that analyzes performance using the currently available data. C-Stat allows offices and divisions within CDHS to pinpoint performance areas in need of improvement, and improve outcomes through targeted changes in practice, helping to enhance the lives of people CDHS serves. Through continuous quality improvement efforts and analysis, CDHS can determine effective areas of practice, and areas for improvement. By measuring the impact of day-today efforts, offices and divisions make informed, collaborative decisions to align efforts and resources to affect positive change. Timeliness of initial response has been a measure through the C-Stat process since 2014. Although the C-Stat measure has evolved to better reflect practice, processes and rule changes, it has been a useful tool in monitoring improvement for this measure.

An analysis of the data associated with statewide overall response times and timeliness of initiating response found that in 2015, the statewide average for meeting the requirements for timeliness of initial response was 89.6 percent. In 2016 the statewide achievement improved to 91.6 percent, and in 2017 the statewide date improved to 94.2 percent. However, upon deeper analysis, it was learned that the data included initial **attempts** within the assigned time frame and did not reflect **actual** face-to-face contact with the alleged victim child(ren). This inclusion of attempted contacts in the calculation unintentionally misrepresented the actual initiation data which is measured against actual face-to-face contact.

In order to better understand when child(ren)/youth were actually contacted, the data has been disaggregated by the 6 Program Improvement Plan (PIP) counties and by actual contacts (not including attempts) made within the required initial timeframes and the subsequent timeframes. In the data set below, the information reflects that all alleged victim child(ren)/youth had an established face-to-face contact; however, the timeframes were not met an average of 21% of the time. The data are also reflective of data statewide.

.	Arapahoe	Denver	El Paso	Fremont	Larimer	Morgan	STATEWIDE
Immediate Rolling	74.6%	82.3%	88.3%	88.4%	89.1%	88.7%	86.6%
Initial	71.9%	79.7%	85.9%	87%	86.1%	88.7%	84.7%
Subsequent	2.7%	2.7%	2.4%	1.4%	3%	0	2.0%
3 Day Rolling	85.2%	78.3%	84.9%	89.5%	93.8%	75%	85%
Initial	73.4%	75.1%	77%	84.2%	89.9%	75%	78.2%
Subsequent	11.8%	3.2%	8%	5.3%	4%	0	6.8%
5 Day Rolling	80%	82.1%	72.8%	72.6%	81.3%	78.5%	81.1%
Initial	62.9%	66.8%	51.9%	57.7%	79.4%	68.4%	66.4%
Subsequent	17.1%	15.3%	21%	15%	8.9%	10.1%	14.7%
Overall	80.2%	82.0%	74.4%	74.9%	88.8%	79.5%	81.8%
Initial	64.2%	67.6%	55.1%	61.7%	80.9%	70.9%	68.7%
Subsequent	16%	14.3%	19.3%	13.2%	7.9%	8.5%	13.1%

Table 3: Victim Child Contacted Within the Assigned Timeframe (1/2018 - 12/2018)

Qualitative data and information gathered through stakeholder interviews, focus groups, and subgroup activities was used to investigate, further analyze the data, and determine contributing factors impacting successful response times.

Analysis of both the quantitative and qualitative data of all response types has shown that:

- Inaccurate/inconsistent calculation of timeframe (both initial and in subsequent) contribute to the missed timeframes.
- Documentation errors for face-to-face contact with the alleged victim child(ren)/youth contribute to the missed timeframe calculations. Documentation errors include: entering incorrect am/pm; neglecting to include all child(ren)/youth in the drop down when face-to-face occurs; and selecting the wrong participants overall.

To address contributing factors impacting timely responses to reports of child maltreatment, state wide efforts include clarity of timeframes through administrative rule to codify initial and subsequent attempts in all response type categories; adjustments to the calculation of timeframes in the system of record, and the algorithms to Trails/ROM to accurately reflect the rolling time frames.

The following are the timeframes and guidance included in the administrative rule:

Immediate response - Assigned when referral indicates there may be present danger of moderate or severe harm or child's vulnerability and/or factors such as drug and alcohol abuse, violence, isolation, or risk of flight increase the need for immediate response:

An immediate response shall require a response within eight (8) hours from the receipt of the referral. If the victim child(ren)/youth cannot be located within the initial timeframe, subsequent face to face contact attempts shall continue to be made every twenty-four (24) hours from the time of the initial attempted contact.

Three (3) day response - assigned when a referral indicates there may be impending danger of moderate to severe harm; or, the alleged victim child(ren)'s vulnerability and/or factors such as drug and alcohol abuse, violence, isolation, or risk of flight, increase the need for intervention in the near future:

The three (3) calendar day count starts on the day following the receipt of a referral and expires at the end of the third calendar day at 11:59 PM following receipt of the referral. If the victim child(ren)/youth cannot be located within the initial timeframe, subsequent face to face contact attempts shall continue to be made within every subsequent three calendar days.

Five (5) day response - assigned when the referral indicates an absence of safety concerns:

The five (5) day count starts on the first business day following the receipt of a referral and expires at the end of the fifth business day at 11:59 PM following the receipt of the referral. If the victim child(ren)/youth or child/youth in conflict cannot be located within the initial timeframe, subsequent face to face contact attempts shall continue to be made within every subsequent five business days.

The administrative rule became effective in March 2018. As part of that implementation effort, the Division of Child Welfare (DCW) revised and developed statewide guidance for complying with requirements, developed and provided formal training via webinar and provided informal in-person, email and telephone guidance (i.e., informational memo, and technical assistance) to county departments regarding clarification for the rule change, timely and accurate documentation, and why this timely response to reports of maltreatment is important for child safety.

Colorado will monitor performance on Item 1 through the Results Oriented Management (ROM) system. Colorado has contracts with the University of Kansas to use ROM, which is an analytic web-based tool that provides ad-hoc reports using Colorado's Comprehensive Child Welfare Information System (CCWIS) data.

The operational definition for this report is the percentage of child(ren)/youth with accepted reports for Child Protective Services (CPS) investigations and family assessments that had an initial face-to-face contact with alleged victims within state specified time requirements. The numerator is the number of child(ren)/youth for which the initial face-to-face contact was made within specified time requirements per State rule. The denominator reports all child(ren)/youth who are identified as victims or alleged victims in an abuse or neglect report. The baseline for Item 1 will be established on aggregate statewide data from a 12-month period beginning April 1, 2018 and ending March 31, 2019. Colorado will provide the de-identified raw data, which is used to create the report for Item 1 (Timeliness of Initial Response), and will upload this data to a secure FTP site, similar to the process used to calculate the in-home sample frame with MASC during the Children & Family Services Review; the syntax will be shared via email.

The CFSR measurement plan baseline for this measure is 84.0% with a goal of 84.3%. While the measurement plan pulls statewide data, the strategies will be implemented in the PIP Counties. Based on the most recent data from ROM, Colorado's performance is 79.9% (Dec 2018- Nov 2019). Achievement of this goal decreased following the rollout of changes to the statewide database system in 2018. Since the database fixes have occurred, there has been steady improvement toward the goal.

The following goal, strategy and key activities were prioritized to improve and sustain this achievement in performance associated with Safety Outcome 1.

Goal 1: Increase safety for children and youth through timely response to reports of child maltreatment.

Outcomes: Safety Outcome 1

Strategy 1: Counties will have timely face-to-face contact with child(ren)/youth identified as alleged victims of child maltreatment.

	Key Activities	Projected completion
1.1.1	DCW will embed timeframe updates from the administrative rules in the initial and ongoing staff training offered by the Child Welfare Training System (CWTS).	Q1-6/30/2020
1.1.2	DCW will develop an online Trails documentation refresher training in alignment with the Trails Modernization project for all caseworker assessment staff and supervisors related to the details and important considerations in how to document an accurate contact note in Trails. <ul style="list-style-type: none"> a) Critical areas addressed in the training will include: entering incorrect am/pm; neglecting to include all child(ren)/youth in the drop down when face-to-face occurs; and selecting the wrong participants overall; and, b) Supervisor role in reviewing and validating case related information, including accuracy of dates, times, and participants for documented case events and activities, as well as the timeliness and completion of the contact events' entry into Trails. 	Q2-9/30/2020
1.1.3	County departments will utilize the learning management system to track and monitor the completion of the documentation refresher training for all assessment staff and supervisors.	Q3-3/31/2020
1.1.4	DCW will monitor county and state level data through C-Stat processes: <ul style="list-style-type: none"> a) Bi-monthly data (collected through ROM) on this measure will be represented to the executive leadership team; b) County performance on this measure will be tracked by the assigned DCW county intermediary and plans for practice improvement will be developed in collaboration with county partners; and, c) DCW will ensure that all counties have access to ROM reports 	Q1 and ongoing- 6/30/2020
1.1.5	PIP Counties and DCW will convene a Supervisor Learning Community (SLC) comprised of a subset of supervisors from each PIP county. The SLC will meet at least every other month throughout the scope of the PIP and will: <ul style="list-style-type: none"> a) Participate in a mutual exchange of ideas, strategies and processes which utilize data to improve outcomes; and, b) Share county-centric process for monitoring timeframes and improving outcomes. 	Q2- ongoing members identified/ meetings scheduled 9/30/2020
1.1.6	Using data, tools and processes, DCW will develop a plan for statewide implementation with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-12/31/2021

Measurement: Increase in the percentage of face-to-face caseworker contacts with child(ren)/youth

Assessing for Safety; Safety Planning and Monitoring

The Child and Family Services Review (CFSR) identified cross-cutting practice concerns that affect the state's ability to meet safety, permanency, and well-being outcomes. One of the findings from the CFSR indicated a need to focus on conducting quality initial and ongoing assessments specific to Youth in Conflict (YIC) cases with particular emphasis on engaging parents and assessing and addressing family needs. A YIC is defined as a child/youth who is involved in a conflict which results in the high likelihood of suffering substantial harm and/or injury to the child/youth, family, and/or community and in Colorado, YIC have specific rules to assessing and providing services to meet needs.

The CFSR also identified challenges in assessing and managing safety and risk concerns in in-home and foster care cases, and in particular for YIC cases. Primary safety concerns for cases identified during the review included insufficient initial safety and risk assessments, lack of ongoing safety and risk assessments, and assessing and addressing the needs of other child(ren)/youth in the home for in-home/YIC cases. Finally, case review results showed safety services that were needed and not provided, and safety plans that were put in place but not monitored.

Safety Outcome 2: Child(ren)/Youth are safely maintained in their homes whenever possible and appropriate.

- Colorado is not in substantial conformity with Safety Outcome 2.
- The outcome was substantially achieved in 62% of the 65 cases reviewed.
- The outcome was substantially achieved in 63% of the 40 foster care cases and 60% of the 25 in-home services cases.

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

- Colorado received an overall rating of AREA NEEDING IMPROVEMENT (ANI) for Item 2 because 75% of the 24 applicable cases were rated as a strength.
- Item 2 was rated as a STRENGTH in 72% of the 18 applicable foster care cases and 83% of the 6 applicable in-home services cases.

Item 3: Risk and Safety Assessment and Management.

This item assesses whether the agency made concerted efforts to assess and address the risk and safety concerns relating to the child(ren) in their own homes or while in foster care.

- Colorado received an overall rating ANI for Item 3 because 62% of the 65 applicable cases were rated as a strength.
- Item 3 was rated as a STRENGTH in 63% of the 40 foster care cases and 60% of the 25 in-home services cases.

Item 3 is correlated with **Item 12, Well-Being Outcome 1** in the comprehensive assessment of whether families have enhanced capacity to provide for their child(ren)/youth's needs both initially and on an ongoing basis, to a) identify the services necessary to achieve case goals and adequately address the issues relevant to the agency's involvement with the family, and b) provide the appropriate services.

- Colorado received an overall rating of ANI for Item 12 because 51% of the 65 cases were rated as a strength.
- Item 12 was rated as STRENGTH in 48% of the 40 foster care cases and 56% of the 25 in-home services cases.

Item 12 is divided into three sub-items:

Sub-Item 12A: Needs Assessment and Services to Child(ren)/Youth.

- Colorado received an overall rating of ANI for Item 12A because 80% of the 65 cases were rated as a strength.
- Item 12A was rated as a STRENGTH in 85% of the 40 foster care cases and 72% of the 25 in-home services cases.

Sub-Item 12C: Needs Assessment and Services to Foster Parents.

- Colorado received an overall rating of ANI for Item 12C because 79% of the 33 applicable foster care cases were rated as a strength.

To adequately and accurately assess child safety and risk of maltreatment, as well as understand the individual and family dynamics and ongoing need to develop effective case plans, engagement with the child and family is crucial. Engagement occurs throughout the life of case and is initiated at the first contact with the child and family. There was universal agreement among stakeholders that the first step toward improving child safety, permanency, and overall child and family well-being is to ensure a consistent assessment and decision-making approach throughout the life of a case that emphasizes family engagement.

The assessment of safety and comprehensive assessment of child and caregiver needs is directly correlated to quality caseworker contact, engagement and involvement with the family. Safety, caregiver protective capacity, and comprehensive needs assessments are the foundation for developing family service plans that effectively address the needs of child(ren)/youth and parents. Research emphasizes the importance of focusing on underlying needs, as opposed to incident-focused symptoms. Too often, the disproportionate focus on symptoms overlooks the child and family history and experience that underlies and produces challenging behaviors. As a consequence, the underlying causes of neglect and abuse may not be adequately addressed and many families are subjects of additional reports of abuse and neglect. Where child(ren)/youth are concerned, inattention to needs can lead to instability, increasingly more restrictive placement settings and the delay or absence of permanency. While many states, including Colorado, may require the use of instruments or tools to guide assessment, the focus should not solely be on the completion of an instrument but rather on the quality of the assessments.

In addition, child(ren)/youth and/or parents involved in a case may have had other screenings, assessments or evaluations completed to address specific issues (i.e. domestic violence, trauma, parenting capacity, or mental health, etc.). Staff should not consider any one of these in isolation as an assessment of needs, but rather examine how information from any or all of these evaluations and screenings are integrated into a broader, more comprehensive assessment by the county that addresses the underlying needs of a family related to safety, permanency, and well-being for child(ren)/youth. Comprehensive and accurate assessment of safety and underlying needs of families and caregivers, and engaging them in tailored services to address those needs, is essential to achieving positive and lasting outcomes for child(ren)/youth and parents. It is expected that the needs of families are critically assessed based on unique histories and circumstances and that concerted efforts include working to engage families in needed safety-related services, and facilitating a family's access to those services.

A review of state data has shown that child(ren)/youth are re-entering care at a high rate. According to data in the Results Oriented Management system (ROM), Colorado failed to meet the national standard for rate of re-entry from January 2018-December 2018 with a high re-entry rate of 18.5 and a low of 17.5 over that time period. Deeper analysis has shown that decisions to re-remove child(ren)/youth are not supported by the utilization of the CFSA, which offers a clear decision-making process and approach. There are two levels of gaps in the safety assessment processes: 1) case managers are not utilizing the safety assessment tool as required at critical junctures to inform decision-making related to removal, reunification, reentry/re-removal, and 2) judiciary and legal partners are determining both reunification and re-removals without appropriate reference and information gleaned from the caseworker and the agency safety assessment findings. The PIP provides an opportunity to enhance case work practice and decision-making to better inform court/judicial decisions.

Colorado has identified three key strategies to achieve an enhanced safety practice:

1. To improved fidelity and consistency in use of the Colorado Family Safety Assessment (CFSA) tool;
 - a) Complete a scan of other safety assessment tools/process and compare to the CFSA;
 - b) Review all CFSA tool processes, including the instrument, instructions, definitions, training and case management documentation;
 - c) Identify areas of inconsistency and make recommendations to improve practice; and,
 - d) Identify processes for ensuring consistent assessing and addressing identified safety issues and preventing removal/re-entry in all assessment and case types, specifically focusing on YIC cases.
2. Promote cross-agency coordination with a focus on creating consistency in practice related to safety, permanency and well-being outcomes in all case types (child protection, Family Assessment Response [FAR], and YIC cases) and creating a shared understanding and application in agency decision-making and encouraging legal partner accountability.
3. Develop and refine safety monitoring strategies that are consistent with thorough safety assessments and prevention of entry/re-entry into foster care.

CFSA Tool and Process

Both formal and informal assessments and information are utilized in Colorado to inform case decisions related to child safety, permanency, and well-being. The CFSA is reliable, comprehensive, and must be consistently applied

across all assessments and case types. The information gathered from the safety assessment process and captured on the tool is used to inform initial and ongoing safety planning, all removal, reunification, and reentry case decisions, as well as to inform case planning.

The Colorado Family Safety [and Risk] Assessment tools were revised through a work group that included input from county child welfare staff, the Administrative Review Division (ARD), Child Welfare Training System (CWTS) and Division of Child Welfare (DCW) staff. Prior to these revisions in 2014, the tools had not been reviewed since 1999. The final tools are based on Partnering for Safety interventions, structured decision-making research and the professional expertise and experience of the members of the work group. The Partnering for Safety philosophy regarding safety assessments includes completing the tools with the family to identify any current or impending danger, and determine risk of future maltreatment, formal and informal support networks, family strengths and protective capacities to help inform the level of intervention by the county department. The completion of the formal CFSA tool is required, per administrative rule, during assessment, before reunification, and prior to case closure. There are specific questions and assessment areas embedded in the instrument to identify safety threats and assess caregiver protective capacities. Additionally, there are established protocols for interviewing child(ren)/youth residing in the home and with caregivers and other household members, to ascertain sufficient information related to safety and family dynamics.

Additional research to support the final tools was completed by the Social Work Research Center at Colorado State University. The CFSA tool was tested for reliability and the Colorado Family Risk Assessment tool (CFRA) was tested for reliability and validity. Three counties, Pueblo, Garfield and Eagle, tested the revisions to the tools. This informed adjustments to the instructions and tools based on caseworker and supervisor feedback regarding usability. Throughout 2016, DCW and CWTS staff provided on-site county-based training on the tool revisions to every caseworker and continuously provided technical assistance and practice guidance as an opportunity for family engagement and critical thinking when completing the tools with families. As of January 1, 2017, all county departments have fully implemented the revisions made to the CFSA tool. Additional rule revisions went into effect in March 2018 to provide further clarity in the use of the tools. In March 2019, administrative rules were added requiring the CFSA to be completed on YIC cases.

Since the implementation of the CFSA and the revised instruction, there has not been a formal review to ensure that the instrument is being consistently utilized as designed, incorporating rule changes and practice expectations. Counties report inconsistencies within and across counties in using the CFSA. The implementation of the Program Improvement Plan (PIP) provides an optimal time to review the CFSA, processes and practices leading to improved fidelity.

The CFSA tool is an effective core element to inform decision-making throughout a family's involvement in the child welfare system and, by agency best practice standards and rule, should be completed with the family, whenever possible. The CFSA tool can be used to support areas of intervention including identification of service needs and courtroom decisions. With multiple individuals involved during an ongoing case (Respondent Parent Counsel [RPC], Guardian ad Litem [GAL], providers, judicial partners), the CFSA can provide a common language for all decision-makers and a concrete assessment of safety if applied and consulted consistently. Through consistent use and sharing the findings from the CFSA, county departments will be able to show and make recommendations to the court on the appropriate interventions and level of involvement. When used at key decision-making points, the CFSA can inform progress by the family, and document when more or less involvement is needed. This values the strengths and protective capacities of the family and is the first step in the development of a behavior-based support plan with a family.

Enhancing the safety practice in Colorado and including the assessment findings in communications with legal and judicial partners will promote a culture of removing child(ren)/youth from the home only when it is a true safety issue that cannot be controlled by department intervention, and ensures child(ren)/youth will be returned to the home as soon as the safety threat can be eliminated or controlled. The ongoing assessment of child safety outside of the assessment phase will be strengthened to support timely permanency, safe case closure, and thereby reduction in reentry and repeat maltreatment. As part of other child welfare transformation efforts, partnership with the court system court administrator staff, Court Improvement Program (CIP), Best Practice Court Teams (BPCT), judges, attorneys for parents and child(ren)/youth, Court-Appointed Special Advocates (CASA), and county attorneys, is imperative to successful implementation of the safety practice model, and is specified in Strategy 2 below. Colorado recognizes that CDHS/DCW and the court system must work in collaboration to support and foster the practice of keeping child(ren)/youth in their homes of origin whenever safely possible. To accomplish this, Colorado will enhance the understanding of the safety assessment approach, tool, and process with legal partners and seek their assistance in supporting its application in practice at relevant junctures such as removal consultations, Family Engagement Meetings (FEM) or court hearings.

By enhancing practice, the department can better prepare and articulate safety-related issues to the court system throughout the life of the case. Efforts are underway to engage the Colorado CIP, BPCTs, and RPC for input into the implementation of the safety assessment practices. Additional local efforts in the implementation sites will begin to solicit input in the form of workgroups from local judges, county attorneys, and attorneys for parents and child(ren)/youth, GALs and CASA.

Through the use of focus groups, court administrators and department staff had the opportunity to explain what services, safety planning, and other safeguards need be in place allowing more families to remain intact when safety issues are identified in the home. Without a mutual understanding and agreement between DCW staff and the court system, a change in the safety culture will be unachievable as both sides play different, yet imperative roles in the assessment and management of child maltreatment issues. DCW and the Office of the State Court Administrator (SCAO) are committed to strengthening this partnership to ensure successful implementation of these strategies. To ensure that both the department and SCAO have a mutual understanding and lens for improving safety-related practice in child welfare, the department will continue to collaborate with SCAO and utilize existing processes to ensure that partners are aware of the agency's process for assessment of the current safety threats, risk of future maltreatment factors, and overall justification for case decisions.

The CFSA tool and protocol provides a standardized format and a consistent approach for collecting, analyzing and reporting information regarding a child's safety. A primary use of the CFSA will be to provide the court with basic information regarding the agency's assessment and decision-making. Based on this information, an appropriate decision may be made regarding probable cause, removal and reentry/re-removal options, and it is an essential tool for the judge in making an appropriate disposition. Complete and accurate information about all aspects of the case, with a recommendation when appropriate, enhances the Court's ability to order a disposition which represents the best interest of the child(ren)/ youth, the family and the community.

Administrative leaders with CIP, RPC and SCAO were present and participated at the state's CFSR final report meeting, have been involved in PIP development, and continue to be involved in stakeholder meetings facilitated by the department. SCAO leadership and staff represent CIP regarding court performance measures and facilitate judicial engagement across the state.

Safety Planning and Monitoring

CFSR findings noted that safety planning and monitoring were insufficient to manage child safety. Stakeholder focus groups and ARD findings showed that safety plans were not created or communicated with families; safety plans were not completed appropriately; safety services were needed and not provided, and there were safety plans put in place but not monitored. During a deeper problem exploration and root cause analysis related to factors associated with why safety plans were not working as intended, DCW discovered that case workers were not creating safety plans that were specific to the needs of the family or within the abilities of the family to complete. There was a lack of a comprehensive understanding of how to craft an appropriate safety plan tailored to the family's strengths and needs. Lastly, there was a lack of an understanding of how to apply the basic principles of safety planning in order to support families and keep child(ren)/youth safe.

DCW will provide guidance and training to staff on what constitutes an individualized safety plan created with the help and input of the family. Staff must understand the basic principles of safety planning in an effort to educate families about safety, which will keep child(ren)/youth safer in their home of origin when possible. Staff will receive guidance so that they are aware that safety plans must be documented in Trails. Supervisors are responsible for approving and continually discussing safety plans during routine supervision with case managers while a safety plan is in effect.

DCW and county partners have determined that there is a need to improve the frequency and quality of supervisor reviews, timeliness of approvals and monitoring of appropriate safety plans. DCW will include ongoing safety discussion in case consultations and FEMs, and require supervisor review at defined intervals, per policy requirements. DCW will also involve the courts in safety assessment training opportunities and will include safety assessment findings and safety plans, as applicable, as part of court filings. The ARD reviews and data will be monitored to determine whether safety assessments are directing treatment plans and if they are appropriately addressing safety concerns and meeting the needs of families and child(ren)/youth. DCW has started messaging PIP county office directors on the effective use of the supervision as a means to monitor direct practice with families and child(ren)/youth and enhance case worker skill and practice. DCW will continue to monitor completion rates of the Supervisor consultations along with any data gathered from focus groups in order to make any needed changes to safety plans and safety and risk assessments processes.

Goal 2: Ensure safety of child(ren)/youth through a thorough, quality initial assessment and actively engaging families in identifying and addressing safety issues throughout the life of a case.

Outcomes: Safety Outcome 2;

Strategy 1: Promote consistency of safety practice throughout the life of a case, including in Youth in Conflict (YIC) (PA4) cases.

	Key Activities	Projected Completion
2.1.1	<p>DCW and the Supervisor Learning Community (SLC) will coordinate with Capacity Building Center for States (CBCS) to facilitate a PIP counties work group:</p> <ul style="list-style-type: none"> a) Complete a scan of safety assessment tools and compare to the CFSA; b) Review CFSA and processes (i.e. tool, definitions, instructions, training etc.); c) Develop a fidelity check/review process; d) Implement the fidelity check/review process for a sample of assessments in PIP counties; e) Using the results of the review process, identify barriers, gaps and challenges with consistency; f) Make recommendation for modification/enhancements to improve consistency; and, g) DCW will make modifications/enhancements (tool, definitions, instructions, training etc.) as necessary; h) DCW will provide learning activities and TA to PIP county supervisors to promote coaching models and practices to use the CFSA tool at key decision-making points in a case; i) PIP Counties will implement the modified tools, instructions, definitions, training etc.; and, j) After 6 months, PIP counties will complete a fidelity check/review process for a sample of assessments. 	Q5-6/30/2021
2.1.2	<p>PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each county.</p> <p>The SLC will meet at least every other month throughout the scope of the PIP. SLC will:</p> <ul style="list-style-type: none"> a) Review data gathered through the CBCS; b) Develop ongoing fidelity and inter-rater reliability review protocols to implement at the county level; c) Share the process with all PIP county supervisors d) Conduct peer-to-peer learning activities, technical assistance, and/or across-county trainings on utilization; e) Communicate lessons learned to the PIP Implementation team; and, f) Model processes for scaling successful, consistent, completion/use of the Colorado Safety Assessment Tool and ongoing fidelity protocols across the state. 	Q2- ongoing members identified/meetings scheduled 9/30/2020
2.1.3	<p>DCW will facilitate distribution/sharing of the revised tool, definitions, instructions and/or training, with case workers and will provide guidance to counties for implementation of ongoing fidelity and inter-rater reliability review protocols.</p>	Q7-12/31/2021
2.1.4	<p>DCW will work with CIP to communicate the importance and purpose of the CFSA tool to BPCT, Judicial Officers, RPC, GALs and City/County Attorneys OCR and RPC through the regular processes.</p>	Q8-3/31/2022

Measurement: Increase the percentage of CFSA's completed as required by rule. Improve accuracy and quality of completed CFSA's.

Strategy 2: Improve caseworker practice in ongoing safety assessing, planning and monitoring through an enhanced Supervisor framework and field skill development.

	Key Activities	Projected Completion
2.2.1	DCW will provide a CFSA refresher learning activity to include: <ul style="list-style-type: none"> a) What constitutes appropriate individualized safety plan b) Engagement and involvement of the family in creating a safety plan; c) Basic principles of safety planning in order to support families and keep child(ren)/youth safe; and, d) Safety plans must be documented and approved in Trails. 	Q5-6/30/2021
2.2.2	To understand adaptive challenges in safety planning and monitoring, each PIP county will: <ul style="list-style-type: none"> a) Convene a county level workgroup, which includes caseworkers, supervisors and other staff as appropriate to discuss basic principles of safety planning in order to support families and keep child(ren)/youth safe; b) Identify county-centric culture and practice barriers to creating safety plans tailored to the family's strengths to ensure safety of the child and identification of the family's network of support; c) Develop strategies to implement solutions; d) Collect feedback on successes and areas needing improvements; and, e) Provide lessons learned to the PIP Implementation Team. 	Q5-6/30/2021
2.2.3	PIP County Supervisors are responsible for continually discussing safety plans and ongoing formal and informal safety monitoring: <ul style="list-style-type: none"> a) Supervisors will work with caseworkers to implement the strategies identified by the work group; b) Each supervisor will develop a process to will meet with case workers and review, approve safety plans and monitor activities; and, c) During supervision, the supervisor and caseworker will discuss ongoing safety concerns and mitigation of those concerns. 	Q4-3/31/2021
2.2.4	DCW and PIP Counties will convene a Supervisor Learning Community comprised of a subset of supervisors from each county. <p>The Supervisor Learning Community will meet at least every other month throughout the scope of the PIP.</p> <ul style="list-style-type: none"> a) Supervisors across the PIP counties will discuss barriers to monitoring safety; b) Discuss county-centric processes/practices for Supervisor practices to regularly check for safety planning and monitoring; c) Identify a process to build Supervisor capacity to track ongoing safety (i.e. monthly meetings with child); d) Share successful county specific processes with other PIP counties; e) Adopt a common process to ensure safety: planning/monitoring process occur across PIP counties; and, f) Review of the process and practice as well as the data to see if adjustments or modifications need to be made. 	Q2- ongoing. members identified/ meetings scheduled 9/30/2020
2.2.5	DCW will work with PIP counties: <ul style="list-style-type: none"> a) Monitor safety planning and monitoring strategies implemented; b) Complete CQI processes to determine if strategies are working; c) Inform any needed adjustments or modifications; and, d) Share and review data and information at the monthly PIP Implementation Team meeting. 	Q5-6/30/2021
2.2.6	Using data, tools and processes, DCW will develop a plan for implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-12/31/2021

Measurement: Increase knowledge of appropriate use of safety planning. Improve monitoring of safety using formal and informal processes.

Engaging Families

Colorado believes that outcomes for child(ren)/youth and families will improve when engagement at all levels and by all stakeholders is embraced and practiced. Through ongoing collaboration and cooperation with families, kin, partners, counties and courts, child(ren)/youth will remain in safe families with supports and services. Engagement is a cornerstone of sound child welfare practice. As such, the Division of Child Welfare (DCW) will prioritize supervision of staff as a means to continually monitor and improve the engagement skills of frontline staff. Colorado believes a focus on increasing the engagement skills caseworkers use with families and child(ren)/youth will result in better safety, initial and ongoing assessments, timely achievement of permanency, and improved well-being for child(ren)/youth and families.

Colorado recognizes that the best ways to improve performance on all outcomes for child(ren)/youth and families is to improve 1) engagement with parents, 2) the quality of visitation with parents, and 3) the quality of assessments - safety, risk and needs. In improving these aspects of practice, Colorado believes that the agency's identification of threats, needs, and matching of services will improve and as a result, there will be a positive impact on preventing entries or re-entries to care and timely reunification and achievement of permanency. In addition to these areas of practice, Colorado recognizes that permanency is a process including all partners working together with a shared objective. It requires focused efforts and commitment beyond the Program Improvement Plan (PIP).

At a statewide level, the Colorado's Child and Family Services Review (CFSR) data showed:

Sub-Item 12B. Needs Assessment and Services to Parents

- Colorado received an overall rating of AREA NEEDING IMPROVEMENT (ANI) for Item 12B because 51% of the 55 applicable cases were rated as a strength.
- Item 12B was rated as a STRENGTH in 43% of the 30 applicable foster care cases and 60% of the 25 in-home services cases.
- In 73% of the 55 applicable cases, the agency made concerted efforts both to assess and address the needs of mothers.
- In 47% of the 43 applicable cases, the agency made concerted efforts both to assess and address the needs of fathers.

Item 15 Caseworker Visits with Parents

- Colorado received an overall rating of ANI for Item 15 because 63% of the 54 applicable cases were rated as a strength.
- Item 15 was rated as a STRENGTH in 59% of the 29 applicable foster care cases and 68% of the 25 in-home services cases.
- In 74% of the 54 applicable cases, the agency made concerted efforts to ensure that both the frequency and quality of caseworker visitation with mothers were sufficient.
- In 54% of the 37 applicable cases, the agency made concerted efforts to ensure that both the frequency and quality of caseworker visitation with fathers were sufficient.

Findings from Colorado's CFSR found that Colorado has a need to enhance the following:

- Permanency Outcome 2: The continuity of family relationships and connections is preserved for children.
- Well-Being Outcome 1: Families have enhanced capacity to provide for their children's needs.
 - Sub-Item 12B: Needs Assessment and Services to Parents, and,
 - Item 15: Caseworker visits with Parents.
- Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.
 - Item 16: Educational Needs of the child
- Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.
 - Item 18: Mental/behavioral health needs of children

Given the statewide CFSR data, the component areas identified as most needing improvement were associated with foster care (out of home) cases, and specifically, concerted efforts to assess and address the needs of fathers and ensure both the frequency and quality of caseworker visits with fathers is sufficient to assess needs, engage fathers to promote and support child-parent relationships, and evaluate safety, permanency and well-being needs of the child.

Throughout the PIP development period, an established DCW CFSR Oversight Committee consisting of DCW staff, county partners and stakeholders from a wide array of disciplines, provided oversight and input in the PIP development, including the ongoing development and review of strategies and activities. Under the guidance of the PIP Oversight Committee, subgroups were formed to investigate and explore the problems, analyze data and understand root causes to inform recommended strategies related to the CFSR findings (Please refer to the Introduction section for details related to subgroup stakeholders). Further public input was sought via a feedback conference call held to review the subgroups' proposals. Following the initial submission of the PIP and upon feedback from the Children's Bureau, stakeholders were also included in revisions and updates to streamline goals and strategies and to provide additional data and analysis. Various stakeholder and focus groups were held to gather qualitative information related to a number of problem areas in an effort to understand the root causes and inform strategies to correct both technical and adaptive challenges.

To better understand these component areas needing improvement, the state and counties engaged in ongoing deeper problem exploration efforts and data analysis related to a) concerted efforts to assess and address the needs of fathers in foster care cases, and b) frequency and quality of caseworker contact with fathers, to explore any contributing factors to the state's struggles with assessing and addressing the needs of fathers in foster care cases and quality contacts with fathers.

Contributing factors impacting concerted efforts to assess and address needs of fathers in foster care cases and frequency and quality of caseworker contact with fathers included:

1. Monthly face-to-face caseworker visit with parents were not required through administrative rules or policy.
2. Lack of initial and ongoing efforts to identify fathers or non-custodial parents:
 - Available resources from other agency resources to locate fathers, Respondent Parent Counsel (RPC) investigators, for example, are not well known or utilized;
 - Fathers are not consistently identified and contacted early in the child welfare involvement (i.e. during the assessment phase of a case) and ongoing efforts to identify fathers is not documented;
 - When fathers are identified, there was a lack of initial and ongoing efforts to locate, contact and engage with fathers;
 - Lack of ongoing efforts throughout the life of the case to engage and include fathers in the case planning, needs assessment and service provision;
 - Diligent search limitations to identification of fathers using public systems (child support, TANF, etc.) is inconsistently available and utilized; and,
 - Families and caregivers, especially fathers, are not consistently included in Family Engagement processes including formal Family Engagement Meetings (FEMs). The inconsistency in engagement reduces the pool of kin resources available to support child(ren)/youth and youth when they are out of home and affects achievement of timely permanency and well-being of child(ren)/youth while in the foster care system.
3. Cultural or implicit bias in child welfare at large, associated with mothers and fathers
 - Incarcerated parents, especially fathers, impacts agency efforts to engage parents;
 - Agency culture has historically chosen to honor mothers' request not to identify, contact or involve fathers in child welfare assessment and cases;
 - Fathers are not valued as parenting partners; and,
 - Attitude and beliefs of staff toward birth parents is impacted by cultural biases.
4. Staff need enhanced skill development in engaging fathers, particularly fathers associated with domestic violence

From identified contributing factors impacting concerted efforts to assess and address needs of fathers in foster care cases and frequency and quality of caseworker contacts, a root cause analysis was completed and the following associated root causes were identified:

- No statewide rule or policy requiring face to face or monthly contact with fathers;
- Guidance or structure for guiding assessment of parent needs does not exist (see memo from April 2019);
- Not identifying and locating father (or noncustodial parents) at initial assessment impacts continued efforts throughout ongoing case;
- Fathers are not valued as parenting partners and caseworkers in some areas identified a need to improve their skill level in engaging fathers, having difficult conversations related to agency involvement and timeframes associated with permanency; and,
- Supervisors are not reviewing cases (or documenting) and coaching caseworkers as a component of the 90 Day Supervisor Review, to help to move the case through the process.

In order to inform strategies to increase positive safety and permanency outcomes, a root cause analysis and stakeholder interviews identified case circumstances and potential barriers that may have contributed to the delay in legal permanency. Among the findings it was determined barriers to permanency were a result of inconsistent engagement of parents in assessment and services and thus, insufficient progress with case plan goals. Solutions to these challenges require both technical and adaptive strategies that support both the workforce's concrete ability to attend to the multifaceted work of full and timely engagement while building capacity to enhance staff skills in facilitation of quality contacts, parent-teaming competencies and supervision through training, ongoing coaching and service provision. DCW collaborated with the counties to brainstorm ideas where practice improvements were necessary and prioritized the goals, strategies and key activities to improve performance.

Colorado believes that the pathway to improving engagement with families in foster care, especially fathers, requires technical structure through appropriate rules, policy, training and tools to help staff understand the vision and work necessary to effectuate positive change in families. Colorado believes: 1) practice improvement begins at the initial assessment and continues throughout the life of the case, 2) fathers are valued and prioritized for inclusion in child welfare cases, and 3) foster care will be viewed as a temporary support to parents, not a substitute for parents and therefore identifying, locating, and including fathers and paternal relatives will lead to increase in relative/kinship placement and support, when placement is necessary. Supervisors are integral to improving practice, understanding unit culture in association with agency priorities, identifying areas of practice and skill development needed in engagement, particularly with fathers, and ensuring quality practice through coaching and modeling and sufficient quality documentation of critical activities throughout the life of a case.

Through the convening of child welfare stakeholders for the development of the PIP, local agencies indicated that tools and checklists for caseworkers to use when making visits would be helpful. With that in mind, Goal 3, Strategy 2 includes the development of a job aid which may be used by caseworkers to support improved communication regarding a number of the items evaluated in Safety Outcome 2, Permanency Outcome 2, and Well-Being Outcome 1. The use of this job aid will be promoted through a Supervisor Learning Community focused on how to use the tool in supervision with caseworkers regarding engagement of fathers and non-custodial parents.

Goal 3: Enhance and strengthen agency engagement with fathers and noncustodial parents, through timely identification and consistent engagement, consistent quality contacts, accurate assessments and provision of services appropriately matched to meet the needs of child(ren)/youth and families.

Outcomes: Well-Being Outcome 1, 2 and 3; Permanency Outcome 2;

Strategy 1: Improve identification of fathers.

	Key Activities	Projected Completion
3.1.1	<p>Each PIP county will develop processes to monitor the following:</p> <ul style="list-style-type: none"> a) During the assessment phase of the case, the caseworker will ask mothers, child(ren)/youth, relatives and other relevant collaterals about fathers' identities for each child in the household and will ensure it is captured and documented. Relevant collaterals may include RPC, Guardian ad Litem (GAL), etc.; b) Efforts to identify locate and engage father will be included in the assessment closure summary; c) Supervisors will review the assessment to ensure father's identity has been entered into Trails no later than assessment closure; and, d) Supervisors will follow-up with caseworkers if a father's identity is missing from Trails and create an action plan to continue/document efforts to identify and ensure the fields are updated prior to assessment closure. 	Q3-12/31/2020
3.1.2	<p>Each PIP county will develop Out-Of-Home (OOH) processes to monitor the following:</p> <ul style="list-style-type: none"> a) The worker must conduct a diligent search for noncustodial/absent parent within 3 days of removal and document in Trails within 30 days; b) In OOH cases, add questions to the Social History to ensure identity of each father is included; c) If the father has not already been identified and documented in Trails, the worker will engage the child, mother, relatives, and other relevant collaterals to identify and locate each child's father (other relevant collaterals may include RPC, GAL, etc.); d) Supervisors will review the case during monthly case consultations with staff and during the 90-Day Supervisor Reviews to ensure ongoing concerted efforts related to identification and documentation of fathers are being completed; and, e) Supervisors will track case needs and schedule follow-up with caseworkers on any assigned tasks, if needed. 	Q3-12/31/2020

	Key Activities	Projected Completion
3.1.3	<p>PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each PIP county.</p> <p>The Supervisor Learning Community (SLC) will meet at least every other month throughout the scope of the PIP. SLC will:</p> <ol style="list-style-type: none"> Create a Supervisor tool/job aid/process to monitor diligent search efforts at critical junctures throughout the life of the case (e.g., assessment phase, when the initial social history is completed, monthly case consultations, and during each 90 day Supervisor Review and when the treatment plan is reviewed); Share the tool/job aid/process with all PIP county supervisors; Conduct peer-to-peer learning activities, technical assistance, and/or across-county trainings on utilization; Supervisors across PIP counties will implement the tool/job aid/process and monitor outcomes; Review father identification and engagement aggregate data on a quarterly basis to determine if the addition of the tool/job aid/process has improved agency ability to identify fathers; Make modifications and add enhancements to the job aide/tool/process, as necessary, based on county feedback and the review of quarterly outcomes; and, Communicate lessons learned to the PIP Implementation Team. 	Q2- members identified/ meetings scheduled 9/30/2020
3.1.4	<p>To understand adaptive challenges and underlying efforts to identify, locate, assess and engage fathers and non-custodial parents, each PIP county will:</p> <ol style="list-style-type: none"> Convene a county level continuous workgroup, which includes caseworkers, supervisors and other staff as appropriate, to discuss the county-centric culture and practices contributing to low engagement of fathers and non-custodial parents; Identify culture change/adaptive strategies to overcome barriers identified; and, Develop and submit a written implementation plan to DCW, by the second quarter following PIP approval, to implement strategies to include: <ul style="list-style-type: none"> efforts to change the culture in that county around the value and importance of fathers in the lives of their child(ren)/youth, skill building activities to help caseworkers work with fathers, develop caseworker skills to have difficult conversations with fathers, etc. processes for intentional, focused, inclusion of fathers in the lives of their child(ren)/youth (i.e. through participation in education meetings, medical, dental or vision appointments, decision making, etc.). 	<p>Q1- convene workgroup- 6/30/2020</p> <p>Q2- Submit plan to DCW- 9/30/2020</p>
3.1.5	<p>DCW will work with PIP counties to:</p> <ol style="list-style-type: none"> Monitor strategies implemented; Complete Continuous Quality Improvement (CQI) processes to determine if strategies are working; Inform any needed adjustments or modifications; Develop other strategies, etc. to support the counties' in the culture change of the organization that is preventing them from meaningfully working with fathers; and, Share and review data and information at the monthly PIP Implementation Team meeting. 	Q4- 3/31/2021
3.1.6	<p>DCW will develop a plan for statewide implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.</p>	Q7- 12/31/2021

Measurement: Increase the percentage of cases with fathers identified for each child.

Strategy 2: Improve frequency and quality of caseworker face-to-face contacts with fathers.

	Key Activities	Projected Completion
3.2.1	DCW will promulgate administrative rule and policy will be enhanced to require monthly face-to-face contacts with fathers	Q1-6/30/2020
3.2.2	DCW will: <ul style="list-style-type: none"> a) Develop a job aid designed to support the improvement of quality of caseworker contacts with parents/caregivers of child(ren)/youth in OOH placement and support consistency for monthly contacts with parents; b) Provide technical assistance and guidance through the information memo series and conduct in-person training for county staff; and, c) Re-enforce the guidance through inclusion in initial and ongoing caseworker and supervisor training. 	Q1-6/30/2020
3.2.3	DCW will collaborate with PIP counties to develop a <i>Frequency of Parent Contacts Report</i> and will provide it as a tool to inform county procedures and processes and to be used during supervisor monthly consultations and 90-Day Supervisor Reviews	Q2-9/30/2020
3.2.4	To understand adaptive challenges contributing to insufficient frequency and quality contacts with parents each PIP county: <ul style="list-style-type: none"> a) Convene a county level continuous workgroup, which includes caseworkers, supervisors and other staff as appropriate, to discuss the county-centric culture and practices contributing to low frequency and quality contacts with fathers and non-custodial parents to manage the safety, permanency and well-being needs of the child(ren)/youth in OOH placements; b) Work with DCW to facilitate a local convening with a panel of fathers with current or prior child welfare involvement to share their experiences including strengths, fears, perceptions and needs working with the department; and, c) Use the work group and the father panel to inform identification of practice changes to improve the quality of caseworker visits with each parent. 	Q2 convene the panel workgroup and coordinate fatherhood panel-9/30/2020
3.2.5	DCW will meet with each PIP county to: <ul style="list-style-type: none"> a) Collaborate on needed supports to improve the quality of caseworker visits with each parent (skill development, training, TA, supervision, tools, etc.); b) Monitor strategies implemented; c) Complete CQI processes to determine if parent contact strategies are working; d) Inform any needed adjustments or modifications; and, e) Share and review data and information with the monthly PIP Implementation Team meetings. 	Q4-3/31/2021

	Key Activities	Projected Completion
3.2.6	Supervisors are integral to practice and process improvements. PIP counties will develop processes to monitor the following: <ul style="list-style-type: none"> a) County supervisors will review the quality of caseworker contact with parents to ensure that sufficient information is documented in Trails that reflects the frequency and quality of the caseworker's contact with each parent; and, b) County supervisors will monitor the frequency and quality (e.g., is the safety threat addressed, are services meeting needs, progression towards permanency goal, length of time in care, hearings and associated tasks, are there new needs or services needed, visitation plan adjustments, identification of additional supports, efforts to identify/locate/engage, inclusion in case planning, etc.) of caseworker visits with each through monthly case consultations, 90-day reviews and other tools and process c) Track themes and identify needed supports to improve both; coach staff to develop their engagement skills for improved quality contacts with parents; and, d) Bring information to the SLC. 	Q4-3/31/2021
3.2.7	PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each county. The SLC will meet at least every other month throughout the scope of the PIP in order to: <ul style="list-style-type: none"> a) Share collected parent contact frequency and quality data; b) Track, review and compare data, as well as information on successes and barriers; c) Identify successful practices and share with all supervisors to inform practice change discussion; and, d) Share with PIP Implementation Team Monthly meeting. 	Q2- members identified/ meetings scheduled 9/30/2020
3.2.8	DCW and PIP counties will work with the Court Improvement Program (CIP) and Best Practice Court Teams (BPCT): Facilitate judicial inquiry of both the caseworker and each parent during court hearings regarding the frequency and quality of caseworker visits with parents especially as related to reasons for agency involvement, safety threats identified, case plan progress and needs, permanency goal and time in care.	Q4-3/31/2021
3.2.9	Using data, tools and process, DCW will develop plan for statewide implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability	Q7-12/31/2021

Measurement: Increase percentage of caseworker contacts with fathers. Improve quality of father contacts as informed through focus groups, inclusion in case planning, surveys, regular feedback from parent workgroup or other convening.

Strategy 3: Include father and paternal family discussions in the 90 day Supervisor review process.

	Key Activities	Projected Completion
3.3.1	<p>PIP counties will develop processes for 90 day Supervisor case reviews with supervisor and case worker, monitoring of the following with regard to father and paternal family:</p> <ul style="list-style-type: none"> a) Mitigation of safety threat; b) Family Service Plan (FSP) progress; c) Permanency goal and progress/identification of barriers to progress; d) Service need addition, modification, expansion, transitions or completion, identification of additional supports; e) Visitation plan adjustments (including level of oversight); f) Efforts to identify, locate and engage fathers; processes for engagement with the father to ensure that progress is shared and services are provided; g) Support network including relative identification (diligent search efforts) for placement and/or support; and, h) Review court report to ensure information from the Supervisor review, with regard to fathers and paternal relatives will be included. 	Q3-12/31/2020
3.3.2	<p>PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each county.</p> <p>The SLC will meet at least every other month throughout the scope of the PIP.</p> <ul style="list-style-type: none"> a) Share data collected about father participation in treatment and case progress; b) Review and compare data and evaluate outcomes (i.e. involvement of fathers, caseworker contact with fathers, father attendance and inclusion in case planning, progress, needs assessment and service provision); c) Identify successful practices and share with all supervisors to inform practice change discussion; and, d) Share with the PIP Implementation Team Monthly meeting. 	Q2- members identified/meetings scheduled 9/30/2020
3.3.3	<p>DCW will create a monthly report in ROM to track and monitor completion of the 90 day Supervisor reviews.</p> <ul style="list-style-type: none"> a) Share the report with the County Leadership, Supervisor Learning Community, PIP County Supervisors, and DCW staff; b) Identify PIP counties needing improvement; and, c) Provide TA, action planning activities, or other processes. 	Q4-3/31/2021
3.3.4	<p>Using data, tools and processes, DCW will develop a plan for statewide implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.</p>	Q7-12/31/2021

Measurement: Increase in the number of cases with a documented 90 day Supervisor case review and inclusion in court reports.

Strategy 4: Improve the assessment of child/youth educational and mental/behavioral needs and services.

	Key Activities	Projected Completion
3.4.1	DCW Child Welfare Learning and Development team will <ul style="list-style-type: none"> a) Develop a training for caseworker/supervisors and YIC caseworkers, to assess for education and mental/behavioral needs and services; b) Roll-out training to PIP county caseworkers and supervisors, including Youth in Conflict (YIC) workers; c) Evaluate the training and make modifications as needed; and, d) Incorporate into training offerings. 	Q3-12/31/2020
3.4.2	PIP counties will develop processes for 90 day Supervisor case reviews with supervisor and case worker, monitoring of the following: <ul style="list-style-type: none"> a) Review of educational needs of the child(ren)/youth; b) Review of mental/behavioral health needs of the child/youth. c) Supervisors will discuss the services needs of child/youth and how those services are being delivered; d) Review court report to ensure information from the Supervisor review, with regard to educational and mental/behavioral health needs, are included. 	Q3-12/31/2020
3.4.3	DCW will work with each PIP counties to review a sample of inhome cases <ul style="list-style-type: none"> a) Identify gaps and barriers to assessing and meeting educational and mental/behavioral needs for in-home child(ren)/youth; b) Build solutions to overcome gaps and barriers; c) Monitor strategies implemented and d) Complete CQI processes to determine if strategies are working and inform any needed adjustments or modifications; and, e) Share information during the monthly PIP Implementation Team meetings. 	Q5-6/30/2021
3.4.4	Using data, tools and processes, DCW will develop a plan for statewide implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-6/30/2021

Measurement: Increased identification of services to meet individualized identified educational and mental/behavioral health needs of child(ren)/youth.

Timely Permanency

In 2018, there were 221,969 calls made to the Colorado child abuse and neglect hotline resulting in 112,964 referrals; 38,699 of those referrals were accepted for assessment, and services were provided to 21,615 child(ren)/youth through open assessments. There were 10,165 child(ren)/youth with new involvements in child welfare, and 1,389 child(ren)/youth entered Out-Of-Home (OOH) placement in 2018. The number of child(ren)/youth who were reunified with their parents, relatives or relative guardians in 2018 was 3,534; 783 child(ren)/youth were adopted and 212 child(ren)/youth emancipated from foster care in the same calendar year as reported in the 2019 Annual Progress and Services Report (APSR). As shown in this data, less than 14% of child(ren)/youth with new child welfare involvement are served through out of home placements. While reunification or placement with relatives as permanency options remains a high value for Colorado's child(ren)/youth, the timeliness of achieving permanent placements is a challenge. Across both the court and child welfare systems, timely permanency is a priority requiring focused action to improve this measure.

Colorado's Child and Family Services Review (CFSR) found that Colorado struggles in the area of achieving permanency which can be improved and enhanced in the following areas:

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

Item 6: Achieving Reunification, Guardianship, Adoption or Other Planned Permanent Living Arrangements

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

Item 10: Relative Placement

Systemic Factor: Case review system

Item 23: Termination of Parental Rights

At a statewide level, CFSR data showed:

Item 6: Timely Achievement of Permanency; reunification, guardianship, adoption or other planned permanent living arrangement

- Colorado received an overall rating of AREA NEEDING IMPROVEMENT (ANI) for Item 6 because only 55% of the 40 applicable cases in the CFSR indicated that this was a strength.
- Concerted efforts to Reunification was achieved in 68% of cases
- Concerted efforts toward timely achievement of Guardianship was achieved in 67% of cases
- Concerted efforts toward timely achievement of Adoption was achieved in only 38% of cases

Item 10: Relative Placement

- Colorado received an overall rating of ANI because 86% of applicable cases were rated as a strength

Item 23: Termination of Parental Rights

- Colorado received an overall rating of ANI for Item 23 based on information from the statewide assessment and stakeholder interviews.

Given the above information, areas identified as needing the most improvement included cases where child(ren)/youth were placed with relatives, and those with a goal of adoption. Although placement with relatives is a strong practice in Colorado, achieving permanency in those placements is an area needing improvement. Across Colorado, the use of Relative Guardianship Agreement Program (RGAP) to support permanent placement with relatives is underutilized.

There were many concerns identified in efforts to achieve permanency through adoption. The CFSR and independent analysis of Colorado's Results Oriented Management system (ROM) data, Administrative Review Division (ARD) data as well as a qualitative analysis identified three primary issues affecting timely adoption finalization: 1) Casework processes/documentation to move a case toward timely finalization included inconsistent or delayed completion of adoption child studies. This delays matching and identification of adoptive families when a family has not been identified and also delays the required information sharing with identified adoptive families; 2) Delays in the termination of Parental Rights (TPR) is a prominent factor in delaying adoption finalization. Data shows inconsistent documentation of compelling reasons for not filing a motion for TPR as well as delays and inconsistencies in timely filing of TPR petitions; 3) Slow appellate processes are another contributor to adoption delays.

In Colorado there are several cross-disciplinary systemic work groups identifying issues and finding systemic solutions in the broader child welfare system. Work groups that are currently addressing permanency include the Permanency Task Group, the Adoption Steering Committee, Colorado Continuous Quality Improvement (CQI) Work Group and the Court Improvement Program (CIP).

The Permanency Task Group is a sub-committee of the Child Welfare Sub-Policy Action Committee (Sub-PAC). The Permanency Task Group is comprised of county representatives community members, adoption advocates, a

representative from the county attorney's group and stakeholders from child placement agencies. The group is assigned projects related to permanency issues including identifying barriers to permanency, possible solutions and focusing on disrupted/dissolving of adoptions, reunification or relative placements. In addition, this task group helps draft rules and guidance for county practice.

The Adoption Steering Committee was a short term work group comprised of state, county staff and other stakeholders, assigned through the Child Welfare Executive Leadership Council. The purpose of the group was to explore, develop, and guide planning for processes to ensure children and youth who have achieved permanency through adoption, and their families, receive the services to prevent re-abuse and re-entry into the child welfare system.

The Colorado CQI Work Group brings county and state child welfare practitioners and other stakeholder partners together to examine state and county performance on key outcome indicators, identify strengths and opportunities in practice, and explore areas of practice that are in need of further research. The CQI workgroup has focused on permanency over several months. They gathered permanency data from the CIP, Colorado's Trails system and ARD.

In addition, the six Program Improvement Plan (PIP) counties convened a focus group during the PIP implementation meeting to identify barriers to adoption finalization. The results of the focus group aligned with data collected by the CQI workgroup, highlighting the child study process, processes contributing to delays to termination of parental rights and appeals processes as factors that contribute to achieving timely permanency.

Child welfare cannot improve adoption process without improving processes through the judicial system. Best Practice Court Teams (BPCT) are essential partners in creating system level changes to improve outcomes for children and youth. They are local multidisciplinary teams led by lead Dependency & Neglect (D&N) judges at the district court level. All twenty-two judicial districts have BPCT and some districts have more than one team. The CIP in collaboration with the Colorado Department of Human Services (CDHS) and Problem Solving Courts plan an annual convening to promote collaborative, team-based approaches to dependency and neglect and delinquency cases in Colorado. At a local level, county departments, BPCT and other judicial partners regularly review available data from courts case management system and the child welfare database, and utilize ongoing CQI processes to develop work plans, strategies, and identify barriers to achieving successful outcomes. Teams are responsible for regular monitoring and shared accountability. It is the responsibility of each BPCT to set goals that can realistically be implemented to effect change at the local level. In addition, local teams meet regularly (as determined by the teams) throughout the year, to evaluate progress and identify barriers. Throughout the PIP, these teams will continue to meet, track outcomes and continuously improve processes.

Adoption Processes

As noted above, delays in adoption finalization were an identified area needing improvement in the 2017 CFSR. ROM data shows that adoptions were not finalized within federal 24 month timeframe in 45.1% of cases in 2018. Of all child(ren)/youth with a goal of adoption, the percentage of cases with terminated parental rights (TPR) was 54.7% in FY 2016 and 57.3% in FY 2015 (AFCARS).

Delays to adoption finalization include:

- Delays in completing a child study
- Delays in filing for termination of parental rights (TPR)
- Delays due to court appeals processes

Child Study

The adoption child study provides detailed information about a child and tells the story of the child's time while in the custody of the county department. The report includes an overview of the family's child welfare involvement and description of the circumstances that led to removal from the home, placement history and descriptions of services provided to the child while they were in the custody of the department. The report also includes detailed information about the child and the parents' medical and criminal history.

During the focus group of the 6 PIP pilot counties, as well as explorative work done by the CQI workgroup, the permanency task group and the adoption steering committee, it was identified that the timing of completion of the child study presented an additional barrier to timely adoption. A sample of adoption cases was reviewed to identify the timing of TPR and the correlation with completion of the child study. Across PIP counties, the delay between TPR and presentation of the child study and full information sharing averaged 283 days. Delays in completing child studies occurred both in cases where an adoption home was identified as well as in those homes where an adoptive home was not identified. Statewide policies and expectations for initiation and completion of the child study are unclear and lack guidance about when or how to complete the child study.

Colorado cannot finalize an adoption without first making full disclosure to the prospective adoptive family through development and review of the child study. When the child study is not completed in a timely manner, the county cannot move forward with filing the adoption petition. There is currently no timeline to inform the caseworker's completion of this important task. Colorado is proposing a 90 day requirement to complete the study post-termination of parental rights and a requirement to update the child study on an annual basis to ensure that the child/youth's story continues to be updated until permanency is achieved.

In order to improve timely child study completion, the Division of Child Welfare (DCW) will promulgate rules and/or provide guidance to describe expectations for accurate and timely completion of the child study. Supervisors will work with caseworkers to include processes for gathering information for the child study throughout a case to minimize the impact to workload at the point of termination. A template for collecting information has been provided to all caseworkers. This template will be recreated in a fillable, on-line form. In the event that the rule is unable to be finalized, the steps to expedite the child study process will still be undertaken in the six PIP counties and development of state-wide process will continue.

Timely Filing of Termination of Parental Rights (TPR)

In all Out-Of-Home cases, working toward achieving a safe, stable and permanent home is a paramount goal. Colorado statute requires initial permanency hearings to be held no later than 90 days after the initial dispositional hearing and subsequent permanency hearings at least every 6 months as long as the case is open. At all permanency hearings, the court must determine if reasonable efforts to return a child/youth home or reasonable efforts have been made to find a permanent, safe and stable home for the child/youth. Counties must document in the family services plan efforts to return home and identify a permanent home. Counties, Guardian ad Litem (GAL), Respondent Parent Counsel (RPC) and judicial partners share the responsibility to achieve permanency for children and youth.

If a child remains in out of home placement for 15 out of 22 months, counties are required to file a termination of parental rights or submit to the court, documentation of a compelling reason showing it is in the child/youth best interests not to file a motion to terminate parental rights. Despite the law dictating TPR filing, according to ARD review results, a little more than half (53.4%) of cases without a TPR filing, included documentation of an appropriate, compelling reason for delaying termination of parental responsibilities. What that also tells us is that, 46.6% of cases did not have sufficient documentation. It is unclear whether the untimely motions are the result of failure to document compelling reasons, or a failure to file based upon other factors.

Exploration with the 6 PIP counties revealed that 33.3% identify a practice of not filing TPR when an adoptive resource has not been identified (i.e. aversion to creating legal orphans) as one of the barriers to timely filing of TPR. Conversely, in cases where no adoptive home has been identified and county practice is to file TPR anyway, the county does not look for adoptive home until post-TPR appeal. In some jurisdictions the courts are not granting TPR if an adoptive home has not been identified.

Because the practice and the data vary significantly by county, the solution to this problem is believed to lie within the counties themselves. The BPCTs will be used to identify barriers and create unique solutions to the issues surrounding delayed filing of motions to terminate parental responsibility. Issues to be explored may include the identification of adoptive resources and the completion of the child study as these issues are often intertwined.

Appeals

An analysis of data and the delays between TPR and finalization for the calendar year 2017, showed adoptions were finalized in less than 12 months from TPR only 50.7% of the time, and in 2018 that percentage declined only slightly to 50.3%. Delays post-TPR were attributed in large part to extended appeals processes. In response to this the Colorado Supreme Court appointed a Colorado Department Child Welfare Appeals workgroup. The workgroup was charged to explore the root of the issue and develop systematic solutions. The workgroup explored data regarding D & N appeal filings from 2015 to 2017. These filings tripled from 55 filings between January and June 2015, to 167 filings between July and December 2017. The Court of Appeals (COA) findings demonstrate that appeals filed in December 2017 took an average of 371 days from the Notice of Appeal (NOA) to the mandate. The COA identified issues within the COA division contributing to the increased time to disposition in D&N cases including: an increase in the number of appeals filed; inefficiency in case assignment and in transcript and records processes; and, a time lag created through an additional Indian Child Welfare Act (ICWA) compliance process.

In response to these findings, the COA implemented policies limiting the use of continuances and has added clear timeframes for filing and responding to a continuance.

The COA piloted an internal process to streamline case assignment including the creation of a special division in the COA to hear D & N appeals and issue opinions, reducing the backlog. The COA has also worked with the records division to provide electronic records in response to requests whenever possible, to review transcripts more quickly and to get clarification when transcripts are unclear. In 2017, the COA instituted a special division to review all TPR appeals cases to ensure compliance with ICWA requirements. The extra step increased delays. However, over time, the number of ICWA concerns brought to the court has significantly been reduced and as a result, the ICWA special division of the court has been dissolved.

Since the inception of the COA workgroup and the process improvements that occurred, the in time to disposition delay has been reduced by 75 days. It is predicted that continued work in these areas will further reduce delays. The appeals workgroup has not yet released a final report and recommendations, however, updates and progress will be included in the CIP self-assessment and the CDHS APSR.

Long term placement with relative/non-relative kin

In Colorado, child(ren)/youth may be transitioned to the custody of relatives or someone with a significant relationship through the Allocation of Parental Responsibility (APR) or through guardianship. One key permanency effort to improve permanency is the Relative Guardianship Assistance Program (RGAP), which addresses permanency for child(ren)/youth. RGAP was put into Colorado rule in 2012 and is intended to help resolve or remove financial barriers for a relative to be a permanent guardian. Specific eligibility and criteria must be met including the exhaustion of efforts of reunification and adoption. Additional statute changes, rules and guidance were established in 2016 expanding the definition of the prospective guardian to include a non-relative foster parent with specific, significant criteria beyond that necessary for a relative/non-relative kin.

The process of APR fails to provide long term financial support for kin providers beyond access to child-only TANF benefits including Medicaid and other public resources based on the income level of the family. In contrast, Colorado's RGAP is available to assist child(ren)/youth in achieving legal permanency when reunification and adoption are not appropriate permanency goals. RGAP may include direct services, financial and medical assistance and case services to relatives and certain non-relatives who have assumed legal guardianship of child(ren)/youth whom they previously served as relative and non-relative foster parents.

Barriers reported by county partners for counties to utilize this program include: 1) struggles to meet the requirement for a family to be certified as foster parents prior to being eligible for RGAP; 2) a gap in knowledge and understanding of RGAP benefits and processes; and, 3) concerns about the long term financial impact to the county.

Colorado has a non-certified kinship review process which includes a question asking if the record shows the kinship family was given the opportunity and the option to be certified. Through ongoing conversations and anecdotal reports, county staff report that challenges to certifying relative/non-relative kin falls into two areas:

- The first is an inability or unwillingness on the part of the relative/non-relative kin, to be certified or go through the certification process.
- The second is reticence on the part of caseworkers to pursue certification of relative/non-relative kin in adherence to county practices or neglecting to introduce certification as an option beyond initial placement.

For both the relative/non-relative kin caregiver and the county worker, the certification process is time consuming as well as cumbersome and confusing. In contrast, the processes to shift custody to relative/nonrelative kin and the allocation of parental responsibility (APR) to relative/non-relative kin are easier and quicker involving less paperwork and a simpler judicial process.

Beyond certification, there is a gap in knowledge about the RGAP process and the long-term benefits for sustained and stable permanency. The criteria to access RGAP for relative/non-relative kin who had a prior relationship with the child include: Provider must be certified as a foster/kinship foster home; child/youth must be in placement in the kin home for 6 months while fully certified; and, the relative/non-relative kin provider must agree to guardianship or APR.

According to the CFSR results, placement with relatives was a strength in 86% of cases reviewed. Despite this strong finding, the final report noted that permanency by guardianship was an area needing improvement in 67% of all applicable cases reviewed).

The following shows the number of agreements entered annually as percentage of placements with relatives:

Year	# RGAP agreements	RGAP % of all Placements w/Relatives
2015	55	4%
2016	87	5%
2017	121	7%
2018	174	11%

Table 4: Relative Guardianship Assistance Program

Although RGAP has continued to grow steadily, it is an underutilized service which could promote permanency through the additional support to relatives/non-relative kin. Counties are reimbursed for RGAP similarly to adoption assistance agreements utilizing a 90/10 split. Among 174 families participating in RGAP that ended on or before December 31, 2018: 14 returned home, 19 were terminated at the request of the provider and 25 emancipated/aged out.

Goal 4: Improve timeliness of permanency through adoptions for child(ren)/youth and increase relative guardianship assistance program (RGAP) participation by qualified relatives/non-relative kin.

Outcomes: Permanency 1; Systemic Factor: Case Review

Strategy 1: Implement uniform practice to support timely completion of adoption child study (statewide measured in the PIP counties).

	Key Activities	Projected Completion
4.1.1	Establish policy/practice for completion of the child study: <ul style="list-style-type: none"> a) Create a work group of stakeholders representing counties across the state; b) Review data, current statute and current rule to make recommendations for rule/practice expectations; c) Draft rule/practice recommendations; d) Present the recommendations to the Sub-PAC and the Policy Action Committee (PAC); e) Hold three statewide stakeholder feedback sessions to include county stakeholders, adoption Child Placement Agencies (CPAs), Office of the Child’s Representative (OCR), ORPC and city/county attorney; f) Integrate feedback/recommendations from stakeholders, as appropriate; and, g) Present to state human service board for review and acceptance. 	Q1-6/30/2020
4.1.2	DCW will communicate child study policy/practice expectation: <ul style="list-style-type: none"> a) Execute a statewide information memo to communicate to include judicial, legal and other partners, information related to the child study expectations; b) Post notification of the rule/practice change through the CDHS list serve; and, c) Provide adoption child study expectation information to DCW staff assigned as county intermediaries. 	Q1-6/30/2021
4.1.3	DCW will work with child welfare training system to provide learning activities and support to adoption caseworkers: <ul style="list-style-type: none"> a) Review and assess current training for adoption workers; b) Identify gaps or areas that need enhancement to align with rule/practice expectation; c) Enhance/modify current training or create new learning activities based on analysis; d) Pilot training in PIP counties; e) Make necessary adjustments; and, f) Roll out as a statewide learning opportunity. 	Q4-3/31/2021

	Key Activities	Projected Completion
4.1.4	To understand adaptive challenges to implementing child study timeframes policies, DCW will convene a group of PIP county case workers and supervisors to identify: <ul style="list-style-type: none"> a) Barriers to implementation; b) Solutions to implementation the new rule; c) Timing in a case to begin information gathering and documentation for use in the child study (i.e. how would they determine how to meet this new expectation); d) Efforts to change the culture in county around the value and importance of gathering information early and accurately to tell the story of child(ren)/youth; and, e) Processes for county- centric skill building activities to help caseworkers gather information throughout the life of a case. 	Q3-12/31/2020
4.1.5	DCW will work with the Permanency Task Group to develop an on-line child study template: <ul style="list-style-type: none"> a) Piloted template in the PIP counties; b) PIP counties will provide feedback; c) DCW will make modifications and enhancements as necessary; and, d) DCW will disseminate the on-line template to counties statewide. 	Q69/30/2021
4.1.6	PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each PIP county. The SLC will meet at least every other month throughout the scope of the PIP. SLC will: <ul style="list-style-type: none"> a) Develop a supervisor check list/guidance to ensure that supervisors are reviewing the use of the on-line child study template; progress of child studies for timeliness and quality of the child study in all cases with a primary or concurrent goal of adoption; b) Share the template and check list/guidance with all PIP county supervisors; c) Conduct peer-to-peer learning activities, technical assistance, and/or across-county trainings on utilization; d) Supervisors across PIP counties will implement the check list/guidance and monitor outcomes during the 90 day supervisor review; e) Gather feedback and input from supervisors, make modification and add enhancements as necessary to the check list as necessary; and, f) Communicate lessons learned to the PIP Implementation Team. 	Q2- members identified/ meetings scheduled 9/30/2020
4.1.7	DCW and PIP counties will work with CIP to facilitate judicial inquiry at the permanency hearing identification of a permanent home.	Q4-3/31/2021
4.1.8	DCW will develop a plan for statewide implementation to non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-12/31/2021

Measurement: Deliver child study policy, practice clarity to case workers. Increase in accuracy, quality and timely completion of child study.

Strategy 2: Counties and judicial partners will work together to reduce the delays in filing for Termination of Parental Rights (TPR).

	Key Activities	Projected Completion
4.2.1	<p>To understand technical and/or adaptive challenges contributing to delays in Termination of Parental Rights (TPR), DCW will work with CIP, PIP county staff and local BPCT to discuss the county-centric barriers, contributing factors and root causes/barriers to TPR delays:</p> <ul style="list-style-type: none"> a) Review TPR data (court, ARD- 15/22 data, and Child welfare Trails/ROM); b) Analyze causes for delays in filing of TPR; c) Identify local jurisdiction barriers; d) Develop strategies/solutions to address barriers; e) DCW will meet with each BPCT workgroup to collaborate on needed supports to implement strategies; f) Gather data to assess if strategies are effective, make modification when necessary; and, g) Share lessons learned with other PIP jurisdictions. 	Q6-9/30/2021
4.2.2	<p>DCW and CIP will work with PIP counties and BPCT to:</p> <ul style="list-style-type: none"> a) Support implementation of strategies; b) Complete CQI processes to determine if TPR delays are being reduced; and, c) If delays are not being reduced, inform and support any needed adjustments or modifications. 	Q4-3/31/2021
4.2.3	<p>DCW, CIP and PIP counties will use the monthly PIP Implementation Team meeting:</p> <ul style="list-style-type: none"> a) Share and review data and information develop other strategies, etc. to support the counties' in the culture change of the organization that is contributing to TPR delays; and, b) Review the strategies identified in the PIP county BPCT and assess/identify those strategies that have positive outcomes for broader implementation. 	Q56/30/2021
4.2.4	<p>DCW and PIP counties will work with CIP to facilitate judicial inquiry at the permanency hearing regarding timely filing of TPR.</p>	Q43/31/2021
4.2.5	<p>DCW and CIP will develop a plan for statewide implementation to non-PIP counties to work with local BPCT to identify barriers, root causes and implement solutions through created action plans to improve timely TPR filings utilizing lessons learned through PIP county processes.</p>	Q7-12/31/2022

Measurement: Increase the percentage of cases with a TPR filing or with a compelling reason for not filing a TPR at 15/22.

Strategy 3: Implement improved court of appeals processes and procedures, at the local level (in PIP Counties) to reduce the time from filing notice of appeal to decision on appeal in order to achieve more timely adoption finalization.

	Key Activities	Projected Completion
4.3.1	<p>DCW and CIP will work with the court of appeals to support the continuation of the appeals workgroup. The appeals workgroup will:</p> <ul style="list-style-type: none"> a) Coordinate development of training topics to be incorporated into existing training for judicial staff and attorneys (i.e. CIP. Office of the Respondent Parent’s Counsel [ORPC], OCR and Children’s Justice Act); b) Facilitate connection to local jurisdictions through the appeals workgroups sub-committees (judicial/legal, records, ICWA, CDHS/CFSR, practitioners); c) Use data to monitor progress and implementation of process improvements; and, d) Participate in a symposium with the PIP jurisdictions. 	Q8-3/31/2022
4.3.2	<p>To understand technical and/or adaptive challenges of the appeal process, DCW will work with CIP, PIP county staff and local BPCT to CQI processes, discuss the county-centric barriers and process gaps:</p> <ul style="list-style-type: none"> a) Review appeal data (court, and Child Welfare Trails/ROM); b) Analyze and identify local appeal process and gaps; c) Develop process improvement strategies/solutions; d) Identify training needs; e) DCW will meet with each BPCT workgroup to collaborate on needed supports to implement strategies; f) Share lessons learned with other PIP jurisdictions. 	Q5-6/30/2021
4.3.3	<p>DCW will work with CIP, PIP county staff and local BPCT:</p> <ul style="list-style-type: none"> a) Review ICWA data; b) Review of ICWA information and processes; c) Analyze local process to ensure that ICWA requirements are being met throughout case processes; d) Identify any barriers or gaps; e) Develop process improvement strategies/solutions; and, f) Share lessons learned with other PIP jurisdictions. 	Q5-6/30/2021
4.3.4	<p>DCW, CIP will work with the appeals workgroup to hold a PIP county jurisdiction symposium for PIP Counties and local BPCT:</p> <ul style="list-style-type: none"> a) Share court of appeals data; b) Update on the appeals process and changes implemented as a result of the workgroup; and, c) Identify local strategies to implement process changes based on the sub-committees findings, recommendations, etc. 	Q6-9/30/2021
4.3.5	<p>DCW, CIP and the appeals workgroup will work with other partners (ORPC, OCR and city/county attorneys) to develop a plan for statewide implementation and expansion of the appeals work utilizing lessons learned through PIP county processes.</p>	Q7-12/31/2021

Measurement: Reduce the average number of days for time to disposition in appealed TPR cases.

Strategy 4: Increase the percentage of certified relative/non-relative kin to expand participation in the Relative Guardianship Assistance Program (RGAP).

	Key Activities	Projected Completion
4.4.1	DCW will work with PIP county staff to: <ul style="list-style-type: none"> a) Review data related to kinship placements to determine percentage that are certified; b) Percentage of certified relative/non-relative kin placements that resulted in allocation of parental responsibility (APR) or guardianship (court, ARD and Child Welfare Trails/ROM) and which had an RGAP; c) Determine barriers to certification; d) Identify if there are local county process barriers to certification; e) Identify and implement local solutions for overcoming certification barriers; and, f) Share processes/practices with other PIP counties. 	Q4-3/31/2021
4.4.2	DCW will work with PIP counties to: <ul style="list-style-type: none"> a) Support implementation of strategies to improve relative/non-relative kin certification processes; b) Complete CQI processes to determine if certification processes are being streamlined; and, c) If relative/non-relative kin certifications are not being streamlined, provide additional technical assistance and support any needed adjustments or modifications. 	Q5-6/30/2021
4.4.3	DCW and CIP will develop and provide training for CIP executive committee and the member committee about guardianship and the availability of the assistance program to support certified relative/non-relative kinship providers as a permanency option.	Q6-9/30/2021
4.4.4	DCW and CIP will work with the CIP member committee (ORPC, OCR, county/city attorneys, judicial partners) to: <ul style="list-style-type: none"> a) Develop processes/practice expectations to increase utilization of RGAP to provide additional support and services to relative/non-relative kin who are permanency options for older youth; and, b) Provide permanency training to CIP executive committee (adoption process, guardianship/APR including RGAP). 	Q7-12/31/2021
4.4.5	PIP Counties and DCW will convene a Supervisor Learning Community comprised of a subset of supervisors from each PIP county. The SLC will meet at least every other month throughout the scope of the PIP in order to: <ul style="list-style-type: none"> a) Discuss the barriers and contributing factors to certification of relative/non-relative kin and utilization of RGAP; b) Identify practice/processes that are working to improve and streamline certification processes and expand the participation of qualified relatives/kin in RGAP; c) Information about relative/non-relative kin certification and RGAP utilization will be shared with the PIP Implementation Team at the monthly meeting. 	Q2- members identified/ meetings scheduled 9/30/2020
4.4.6	DCW will develop a plan for statewide implementation of relative/non-relative kin certification processes to reduce barriers across non-PIP counties with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-12/31/2021

Measurement: Increase percentage of eligible relative/ nonrelative kin participating in RGAP. Increase the number of judicial, court and attorneys who are trained about the benefits/ processes for relative/ nonrelative placement.

Systemic Factors

Data from the CFSR found that the following systemic factors and identified items were rated as areas needing improvement which will be addressed through the PIP:

- **Statewide Information System**
- Item 19 Statewide Information System
- The final report noted that the state is not operating a statewide information system that can readily identify the status, demographic characteristics, location, and goals for the placement of every child in foster care. Additionally, Colorado does not have a mechanism to cross-check the accuracy of the information entered into Trails.
- **Staff and Provider Training**
- Item 26 Initial Staff Training
- Colorado does not have a state-level tracking process to monitor workers' compliance with training requirements. Colorado has a curriculum of CORE training for newly hired staff that all staff receives before they assume a caseload or job responsibilities. Caseworkers and supervisors are monitored and certified at the county level upon completion of their pre-service training requirements, including completion of all transfer-of-learning (TOL) activities. Colorado has begun improvements via Trails modernization to allow monitoring and tracking compliance at the state level.
- **Service Array and Resource Development**
- Item 29 Array of Services
- The state provides a comprehensive service array through the child welfare agency's Core Services Program and has the ability to adapt and adjust these services through flexible funding; the service array is more accessible in the larger metropolitan areas than in the more rural areas of the state.
- **Foster and Adoptive Parent Licensing, Recruitment and Retention**
- Item 33 Standards Applied Equally
- The state has a process in place to issue foster home licenses. Although data regarding county-issued foster care home certifications and re-certifications are available, data regarding child placement agency-issued foster care home certifications and Department of Child Welfare-issued licenses are not captured in a manner that shows whether the agency is applying standards equally to all certified foster care homes and licensed facilities. Stakeholders reported gaps in communication among the various licensing entities and differences in the application of standards and practices for certifying homes.

Item 19: Statewide Information System

The Trails Modernization project will pursue an information system in compliance with Code of Federal Regulations (CFR) requirements at 45 CFR 1355.50. Per the 45 CFR Part 95; and Chapter III, Colorado has transitioned from a Statewide Automated Child Welfare Information System (SACWIS) to a Comprehensive Child Welfare Information System (CCWIS). The Trails Modernization project currently underway qualifies as a transitioning project with an open Implementation Advanced Planning Document (IAPD).

The new child welfare case/client management system will increase business process efficiencies and reduce duplicative data entry while shifting time spent on documenting service activities to offering more services with the same set of resources. The system will also provide a more modern, effective and elegant interface that is easy to gather placement, demographic data and accurate permanency goals with updated data verification processes.

Colorado understands that CCWIS regulations define an automated function as a computerized process or collection of related processes to achieve a purpose or goal. The automation of data quality has guided every requirement definition, functional design, use case, system test script and User Acceptance Testing (UAT). At each phase of the Trails modernization project, staff has maintained a strong alliance to the data quality standards of accuracy and completeness. This includes development of functions to prevent duplicate data capture, prompts to support timeliness and system generated error messages to ensure completeness. The strategy includes the generation of reports to identify any CCWIS data issues.

Item 26: Initial Staff Training

In July 2018, the Trails Modernization project included an enhancement that links certification level to the functionality available in Trails. For example, Trails will prevent a newly hired caseworker from being assigned as a primary worker until they receive their certification. In addition, the certification will expire on June 30th of each year unless the worker completes the annual training hours, documents them in the Child Welfare Training System (CWTS) Learning Management System (LMS) and is recertified by the Division of Child Welfare (DCW) Training Unit. Throughout FFY19, the CWTS made a series of upgrades to the LMS automating the recertification process and allowing the DCW Training Unit Staff to easily update the certification status in Trails. As of July 1, 2019, Colorado has fully implemented a state-level learning management system (LMS) training tracking process. Caseworkers and supervisors are monitored and certified at the county level upon completion of their pre-service training requirements, including completion of all TOL activities.

There are a number of strategies throughout the Program Improvement Plan (PIP) that include the use of learning activities to improve practice in specific areas. Colorado recognizes that training on its own does not improve practice; however, training along with the use of standardized tools and checklists are appropriate and necessary activities to accomplish practice change. When feasible, activities such as coaching and mentoring to reinforce information learned in training, or activities and tools designed to engage supervisors in supporting and reinforcing the application of knowledge or skills learned from the training provided to caseworkers, are also included.

Item 29 Array of Services

Information in the statewide assessment and collected during interviews with stakeholders showed that although the state provides a comprehensive service array through the child welfare agency's Core Services Program and has the ability to adapt and adjust these services through flexible funding, the service array is more accessible in the larger metropolitan areas than in the more rural areas of the state.

In an effort to expand the service array, Colorado identified gaps in services to kinship care givers and also identified a need for post-permanency services to prevent re-entry. As a result of these findings, Colorado has expanded services to kinship providers and for post-permanency supports across the state. Colorado was awarded funds to form a multi-systemic work group composed of counties and non-profit organizations using existing practices to develop a Colorado Kinship Navigator model. Colorado's model assists kinship caregivers in learning about, finding and using programs and services to meet the needs of the child(ren)/youth they are raising as well as their own needs, and promote effective partnerships among public and private agencies to ensure kinship caregiver families are served across jurisdictions.

In collaboration with the Adoption Exchange, Colorado is expanding the service array for post-permanency support. The primary goal of the program is to provide the tools and support necessary for families to successfully navigate the challenges of parenting their child(ren)/youth. Families who will be served through this program include biological families who have reunified with their child(ren)/youth and no longer have an open case with the Colorado Department of Human Services (CDHS), kinship families who have guardianship of the child(ren)/youth in their care and finalized adoptive families.

Item 33 Standards Applied Equally

Colorado currently has two avenues for foster parent certification. The first is certification through a county department of human/social services and the second is through a private or nonprofit child placement agency (CPA). County foster homes are reviewed for compliance with rule and certification standards by the Administrative Review Division (ARD). CPA foster homes are reviewed for compliance with certification standards through the Placement Services Unit of the DCW.

Information in the statewide assessment showed that the state has a process in place to issue licenses to CPA foster homes. Although data regarding county-issued foster care home certifications and re-certifications are available, data regarding child placement agency-issued foster care home certifications and Department of Child Welfare-issued licenses are not captured in a manner that shows whether the CDHS is applying standards equally to all certified foster care homes and licensed facilities. Stakeholders reported gaps in communication among the various licensing entities and differences in the application of standards and practices for certifying homes.

In order to gain insight into this concern, the Office of Children, Youth and Families (OCYF) and CDHS leadership determined the Audit Division would perform an audit focused on identifying the differences between the ARD and Placement Services Unit review processes. DCW and ARD are collaborating to develop protocols and shared tools for certification reviews and associated staff will be trained to ensure consistency.

Goal 5: Strengthen systemic practices to improve child welfare outcomes for safety, permanency, and well-being.

Outcomes: Systemic Factors Statewide Information System; Staff and Provider Training, Service Array and Resource Development; Recruitment/Retention

Strategy 1: Institute Trails modernization and improve data accuracy and training track ability.

-	Key Activities	Projected Completion
5.1.1	DCW and the Trails Mod contractor will continue the Trails modernization processes to update the case management system to improve the system capacity to capture case information.	Q4-3/31/2021
5.1.2	DCW will ensure that the Trails modernization system includes a cross check for accuracy of case data including: a) Address/location of placements; b) Child demographic information (date of birth, gender and race); and, c) Current/most recent permanency goal.	Q4-3/31/2021
5.1.3	DCW will track the caseworker/supervisor certification and recertification process: a) Communicate data entry standards related to timely entry of training-related data in the LMS to counties; b) Update caseworker/supervisor certification status in Trails; and, c) Ensure that all caseworker/supervisors are currently certified as indicated in Trails.	Q4-3/31/2021

Measurement: All case specific data will be captured in Trails. Caseworker certification status will be reflected in Trails.

Strategy 2: Improve available service array to meet the individual needs of children, youth and families.

-	Key Activities	Projected Completion
5.2.1	DCW staff will use federal grant funds to develop a kinship navigator planning work group and will provide: a) Guidance (which may include, but are not limited to, over-the-shoulder coaching, in-person courses, webbased training, webinars and/or micro-burst videos) to implementing counties regarding policy and funding for kin providers; and, b) Technical assistance to county partners using the kinship navigator program to increase the use of the kinship needs assessment tool to identify needs and provide services.	Q6-9/30/2021
5.2.2	DCW will work with a contractor to: a) Provide post-permanency service to families; b) Identify rural counties for priority rolling out of these services; c) Roll out program in rural counties; d) Provide specialized learning activities to professionals working with post-permanency families	Q4-3/31/2021
5.2.3	DCW will develop a plan for statewide implementation of the kinship support and post-permanency services and with measures to incorporate ongoing assessment, evaluation, adjustments and sustainability.	Q7-12/31/2021

Measurement: Kinship navigator programs and post permanency services will expand to rural communities across the state.

Strategy 3: Improve consistency of applied standards among various licensing entities for certifying foster homes.

	Key Activities	Projected Completion
5.3.1	The Colorado Office of Performance Management and Strategic Outcomes will: <ul style="list-style-type: none"> a) Conduct an audit on the foster home certification processes; b) Review of CPA and county foster certification and recertification standards; c) Review monitoring processes for all certified foster homes; and, d) Make recommendations for process improvements. 	Q2-9/30/2020
5.3.2	DCW will review recommendations made by the CDHS performance management division: <ul style="list-style-type: none"> a) Implement recommendations for process improvements; and, b) Monitor ARD and Placement Services Unit process for implementation and consistency. 	Q3-12/31/2020

Measurement: Improved consistency in certification and recertification review process for county and CPA foster homes.

Appendices

Acronyms

ANI - Area Needing Improvement
 APR - Allocation of Parental Responsibility ARD
 - Administrative Review Division
 APSR - Annual Progress and Services Report BPCT
 - Best Practice Court Teams
 CASA - Court Appointed Special Advocates
 CBCS - Capacity Building Center for States CCWIS - Comprehensive Child Welfare Information System
 CDHS - Colorado Department of Human Services
 CDPHE - Colorado Department of Public Health and Environment CFR
 - Code of Federal Regulations
 CFRA - Colorado Family Risk Assessment
 CFSA - Colorado Family Safety Assessment
 CFSP - Child and Family Services Plan
 CFSR - Child and Family Services Review
 CIP - Court Improvement Program CJA
 - Children's Justice Act
 COA - Court of Appeals
 CPA - Child Placement Agency
 CQI - Continuous Quality Improvement
 CWTS - Child Welfare Training System
 DCW - Division of Child Welfare
 DVP - Domestic Violence Program
 DYS - Division of Youth Services D
 & N - Dependency and Neglect
 FAR - Family Assessment Response
 FEM - Family Engagement Meetings GAL
 - Guardian ad Litem
 ICWA - Indian Child Welfare Act
 IAPD - Implementation Advanced Planning Document
 ICWA - Indian Child Welfare Act

IH - In Home
LMS - Learning Management System
NOA - Notice of Appeals
NTDC - National Training and Development Curriculum
ROM - Results Oriented Management OEC
- Office of Early Childhood
OCR - Office of the Child's Representative
OCYF - Office of Children, Youth and Families OOH
- Out of Home
ORPC - Office of the Respondent Parent Counsel
PIP - Program Improvement Plan QA
- Quality Assurance
RGAP - Relative Guardianship Agreement Program
RPC - Respondent Parent Counsel
SACWIS - Statewide Automated Child Welfare Information System SCAO
- Office of the State Court Administrator
Sub-PAC - Sub-Policy Action Committee
SAFY - Specialized Alternatives for Families & Youth TOL
- Transfer-of-Learning
TPR - Termination of Parental Rights
UAT - User Acceptance Testing YIC
- Youth in Conflict