



In February of 2016, the New Hampshire Department of Health and Human Services, Division for Children, Youth and Families (DCYF) initiated a process to administratively close overdue abuse and neglect assessments. A team of supervisors and field administrators met on February 22 and 23, 2016 and administratively closed 598 assessments. This process involved reading all victim interviews of each case and assessing for imminent danger. Once it was determined there was no imminent danger, individual allegations were indicated as unfounded and the over-all assessment finding was indicated as incomplete, for example unable to locate and closed. For assessments requiring a safety plan, the designated team member was to ensure the safety plan was completed prior to case closure. In order to safeguard against the possibility that this abbreviated closure process may have allowed children to be exposed to abuse and/or neglect. Following this process, the Commissioner of DHHS, requested a review of a sample of the administratively closed assessments to validate that there were no unsafe children in them. Eckerd Connects was selected to complete this review based on its experience in risk and safety assessments.

Eckerd Connects is a national nonprofit, 501(c)(3) organization headquartered in Clearwater, Florida with a full continuum of behavioral health, workforce development and child welfare programs. Founded in 1968, Eckerd Connects provides services to more than 35,000 children and youth in twenty states and the District of Columbia annually. In 1986, Eckerd Connects partnered with the Division for Children, Youth and Families (DCYF) to operate the residential outdoor therapeutic program known as Camp E-Toh-Anee in Colebrook, New Hampshire for the treatment, education and rehabilitation of delinquent adolescent males. While Eckerd Connects no longer operates this program, Camp E-Toh-Anee served and helped more than 500 New Hampshire youth over its 20 year existence.

Today, Eckerd Connects provides prevention, intervention, residential, foster care, out-patient, aftercare, workforce, education, system of care administration and consulting services for children, young adults and families. Among these services, Eckerd Connects launched Eckerd Rapid Safety Feedback® (ERSF), an innovative quality assurance review process which combines the use of data analytics with quality assurance coaching. ERSF identifies the cases with a high likelihood of a poor safety outcome, then institutes an intervention designed to ensure the highest level of casework on each case through the use of a safety-focused review and peer coaching between quality and field staff when needed. Eckerd Connects' work in this regard has been recognized by the Federal Commission to Eliminate Child Abuse and Neglect Fatalities and the House of Representatives Ways and Means Human Resources Subcommittee.

Based on this experience, the New Hampshire Division for Children, Youth and Families contracted with Eckerd Connects for an external analysis of the relative quality of practice by DCYF staff across a specific sample of the above-mentioned administratively closed

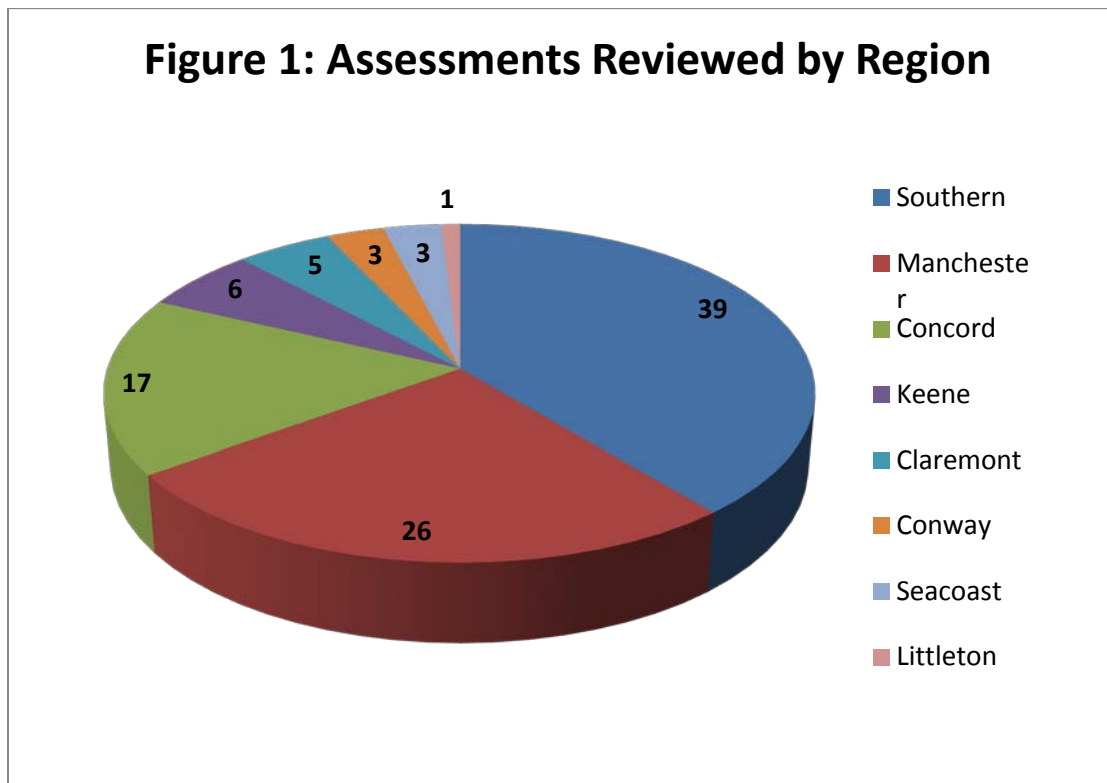
assessments. The focus of this case review differed from many traditional quality assurance case reviews which generally emphasize compliance with internal procedures, (i.e. case timelines or referrals for a specific service when certain conditions are met). Instead, the intent of this review was to evaluate critical thinking, safety, and best case practice and then develop a review tool that reinforced these concepts. Most importantly, given that the impetus for the review was a series of assessments being closed through an abbreviated administrative process, DCYF also wanted to ensure that no -assessment was closed with a child known to be unsafe. Eckerd Connects partnered with DCYF to create a New Hampshire-focused tool which is based on the tools developed for Eckerd Rapid Safety Feedback® (ERSF®) but also addresses these specific goals. This development also benefited from review of the New Hampshire Assessment Review tool which provided context. Finally, Eckerd Connects and DCYF agreed to use the existing agency Red Flag process for children Eckerd Connects believed to be unsafe.

The New Hampshire review questions examine the sufficiency of six critical domains related to information gathering, assessment, and the use of safety interventions within the overall case context. The review tools used are, by design, subjective in nature and they set a high standard. For example, the sufficiency of a child interview can be influenced by the child's age, location, and pattern of prior allegations, timing, current allegation type, developmental delays and other factors. While this is more difficult to measure than compliance, it promotes a deeper understanding of workforce strengths and opportunities for improvement. Furthermore, if policies are themselves flawed, this type of assessment can avoid reinforcing a regulatory framework that itself could be contributing to poor outcomes through time-consuming requirements that sound good in theory but do not translate into improved outcomes. It should be noted that the review tool was reduced in scope by DCYF at the outset to exclude analysis of supervisory review quality as DCYF does not require supervisory conversations to be documented although this does not mean they did not occur. While this is typically a critical part of review methodology used by Eckerd Connects; DCYF conceded that supervisory review processes were not followed on these assessments due to the abbreviated administrative closure process.

The Eckerd Connects review team consisted of four case reviewers, all with extensive experience completing ERSF®-based case reviews, an average of more than ten years of child welfare experience, and each with a mix of front-line and quality improvement experience. The project lead, has more than fifteen years of relevant experience, including safety consulting work with twelve states and protective investigations management, and has presented to the National Association of Social Workers, Child Welfare League of America, National Governor's Association, Casey Family Programs, and to Congressional subcommittees.

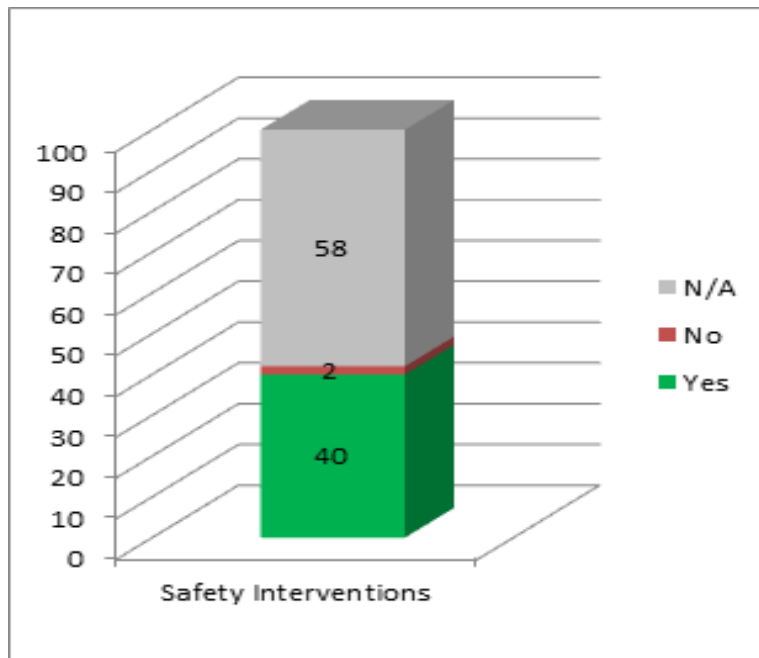
Because DCYF aimed to determine if assessments were closed leaving children unsafe, Eckerd Connects reviewed a sample of one hundred assessments closed using the administrative closure process in February 2016. The sample was not chosen at random, but rather was selected from assessments according to risk-based criteria, designed to yield higher risk assessments from within the administratively closed assessments. All assessments had a prior history of abuse and/or neglect allegations, a young child under the age of five in the home, and/or sexual abuse allegations. The average number of prior reports for the assessments

received was 2.3 with twenty-one assessments having four or more prior reports. Eckerd Connects prioritized cases deemed to be at highest risk first for review, such as cases with a sexual abuse allegation. Assessments were reviewed from across New Hampshire with the highest representation from Southern, Manchester, and Concord Regions. Figure 1 below depicts the number of assessments from each area for the sample reviewed. As 100 assessments were reviewed, the number and percentage of assessments reviewed are identical.



For important context, often reviews of this nature are intended to evaluate overall agency functioning. It is important to understand this review followed a comprehensive quality assurance review by the Center for the Support of Families (CSF) of December 2016. Given that review's more representative sample size and organizational capacity assessment, we believe it is a more appropriate yardstick of overall agency performance. While it is unsurprising that our review reinforces a number of key concepts and recommendations from the CSF report, it should be viewed as an assessment of the administrative closure assessments only. Finally, given that the administrative closures occurred before the submission of the CSF report, New Hampshire DCYF would have not been aware of upcoming results from the CSF report at the time these assessments were closed.

**Figure 2: Safety Interventions**



### **Safety Interventions**

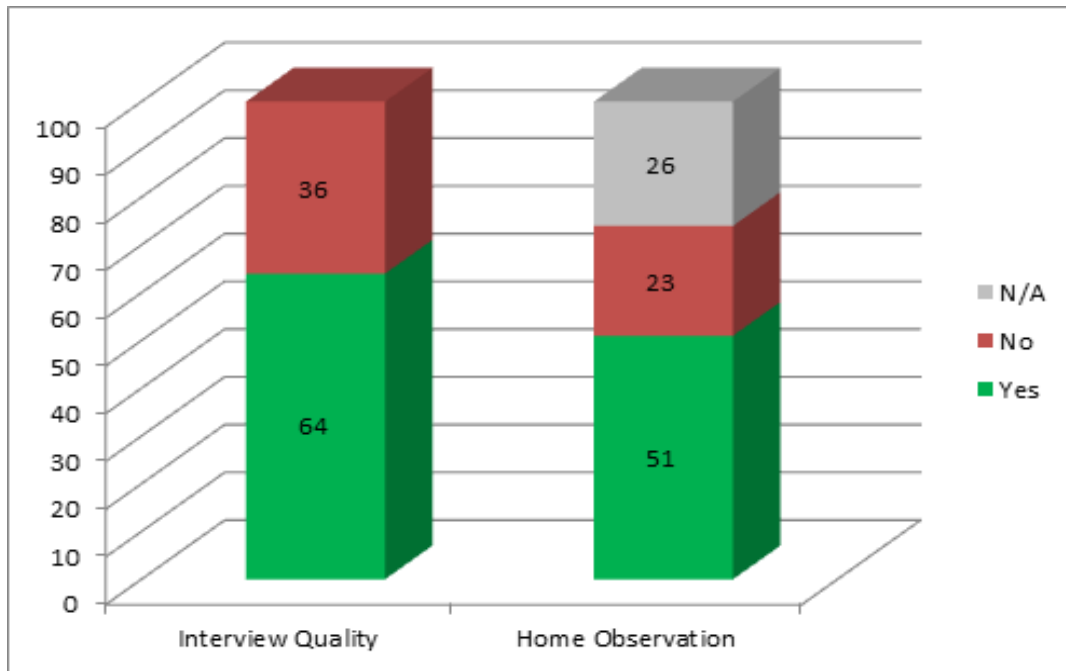
First and foremost, safety interventions controlled for danger and imminent risk of harm where it was documented. Out of 100 assessments, 98 were rated as either sufficient regarding this key question or the case did not require a safety intervention.

To receive an insufficient score on this domain, caseworkers either would have to fail to implement an appropriate intervention when one was needed (e.g. the relocation of a perpetrator out of a home that would mitigate serious dangers), or fail to have a plan to adequately monitor that the intervention occurred. There are a number of key opportunities that emerged from the review; this item was rated sufficient or not needed in all but two assessments reviewed. Safety interventions were deemed a finding of strength and evidence that DCYF closed these assessments with regard for the safety of children.

There was one assessment in which the red flag process needed to be followed. Eckerd Connects alerted DCYF to the concern and the assessment was reopened and the family was located. DCYF reports that through home visits by the worker with the family, it has been determined there are no current safety concerns for the children and the assessment was closed as unfounded.

In regards to the other assessment rated not sufficient, the reviewer found a subsequent assessment was accepted and the family had moved, thus alleviating the safety concern for the children as it was related to hazardous conditions in the previous residence. Therefore, Eckerd Connects determined that a red flag concern did not need to be generated for this assessment.

**Figure 3: Interview Quality and Home Observations**



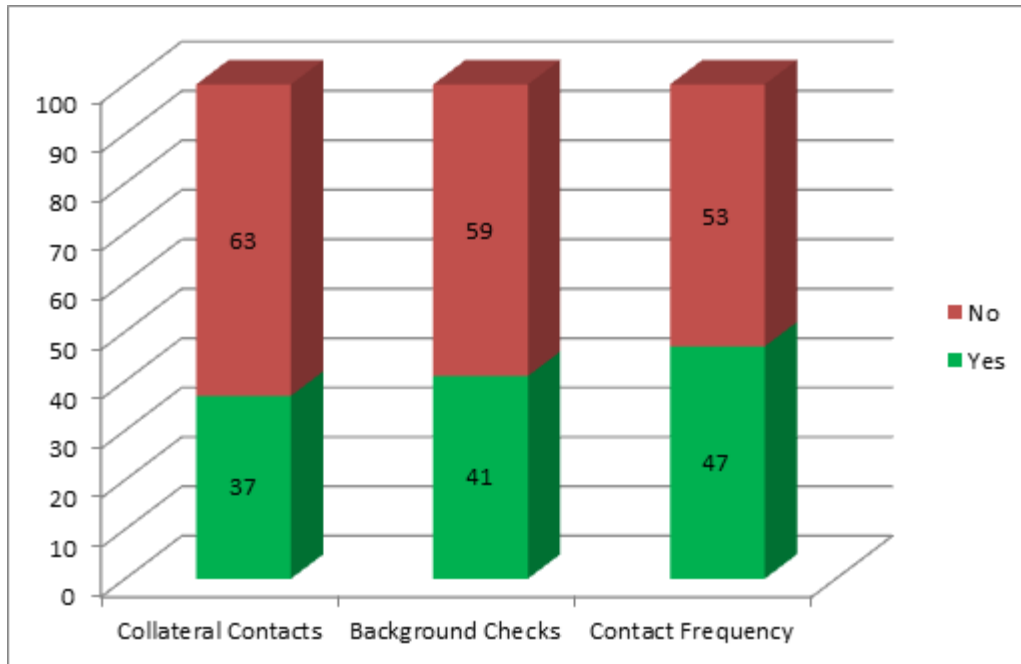
\* It should be noted that Home Observation is not required on all assessments per NH leadership such as on educational neglect allegations,

Eckerd Connects believes that in order for recommendations and shifts in practice to be most meaningful, they must be prioritized. It is notable that in both of the assessment areas, a significant majority of assessments met the high standard for performance set out in the case review tool and DCYF closed these assessments with regard for the safety of children.

However, improvements are still needed in the following areas. The first of these areas was that information gathering and whether, interviews and observations were of sufficient quality to assess danger and risk. This is a relatively high standard, requiring an exploration of concepts such as child vulnerability, the parent-child interaction, and separate interview of case subjects. Generally this was a strength in 64% of assessments. An increased focus on emerging risks, and documentation of parental protective capacities would improve DCYF performance on this assessment domain.

The second priority area is that most assessments had a thorough assessment of the home documented, including whether safe sleep was assessed for young children. If any risks were documented in the home environment, they were addressed promptly in all but six assessments.

**Figure 4: Priority Areas for Improvement**



Three priority improvement areas emerged from the review. In each case, the majority of assessments reviewed did not meet the high standard set for assessment by the review tool. These were background checks, contact frequency, and collateral contacts.

Regarding background checks, the review team was looking for documentation that a background check had occurred on all parents or caretakers residing in and out of the home, whether the level of interaction of adults frequenting the home with the victims was documented, and if themes and patterns from historical information were considered as needed on the assessments reviewed. While household composition and level of interaction was present on most assessments, more than half the assessments did not have documentation of background checks on one or more caretakers and a third of the assessments did not appear to incorporate themes from prior reports in decision-making. For example, patterns of prior allegations for substance abuse often did not get incorporated in the administratively-closed assessment if no current allegations explicitly mentioned a substance abuse concern.

Regarding contact frequency, victims were the clear focus of DCYF. Victims were generally interviewed, or sufficient attempts to do so were documented, and family dynamics were also frequently observed. However, the review team noted that in many assessments not all non-victim children (such as children who do not reside in the home but may routinely visit the home) were interviewed and/or observed. Further, on forty assessments, not all parents or caregivers (often non-custodial parents) were interviewed, or sufficient attempts were not made to reach them.

Regarding collateral contacts, the review sought to ascertain if collateral contacts were obtained that could refute or verify the allegations made and the case subject's statements about them, and if the collateral contacts were made with individuals in a good position to provide insight on the family. While professional collaterals were typically obtained, such as those from a medical provider, collaterals from less traditional sources, such as neighbors or relatives, were missing more often than they were present.

It is worth noting that while New Hampshire policy does not require what the Eckerd Connects case review required regarding background checks, in that it does not require criminal history checks in every case. However, it does expect that prior assessments received by DCYF be considered. Further, New Hampshire had a statute that is "stringent in defining risk of harm" and the administrative closure process prevented supervisory review that might have intervened to improve casework prior to typical case closure. Nevertheless, taken together, these findings reinforce a central finding of the CSF review (available at <https://www.dhhs.nh.gov/dcyf/documents/csf-ga-review-report.pdf>):

*"While the immediate safety of children was generally prioritized, assessed and acted upon, the risk of future harm was often not adequately assessed, often leading to a pattern of repeat reports involving the same unresolved risk factors, for example, parental drug abuse or underlying mental health issues."*

#### **Recommendations:**

DCYF is currently addressing a number of the reforms suggested in the CSF report. To this end, New Hampshire DCYF has embarked on a Child Welfare System Transformation project and created a comprehensive action plan that provides detail as to how they are addressing each of the report's recommendations including a structure for frequent reporting to the DCYF Executive team on project progress.

In light of the alignment of Eckerd Connect's findings with the findings within the CSF report, as well as the current reforms already underway, it does not make sense to distract from this work by adding more. The Eckerd Connects review simply reinforces the need for and the urgency of existing reforms for New Hampshire DCYF. Critically, despite all of the work that has occurred including the approval or reallocation of existing resources, DCYF has confirmed that two foundational challenges are currently facing the agency. Namely, workload capacity remains low amongst child protective staff and the agency still faces a significant backlog. NH DCYF has reported that they have made significant progress in staffing increases, but still lack sufficient resources to accomplish the recommendations. They report these are issues typically related to a workforce that is not sufficient to handle the current high workload.

It is our recommendation then, based on New Hampshire DCYF having to choose between directing further resources to this project or to reducing the existing backlog, that they prioritize the backlog reduction at this time. This opinion was informed by the following key considerations:

- 1) The majority of the 598 administratively closed assessments have now either been reviewed or the family has had a subsequent assessment allowing a more recent opportunity to assess family needs or both (342 of 598).
- 2) This administrative closure activity now occurred more than 21 months ago. By the time another review would occur, likely more than 2 years would have passed, further attenuating the ability of the review to accurately assess these families today.
- 3) Most importantly, while opportunities for improvement in the assessments reviewed were significant, they only rose to a red flag level on one case. DCYF reports an assessment was generated and has closed as unfounded. DCYF should instead focus on the urgent need to address practice of its current assessments. In particular, available additional resources would be more appropriately targeted to the more than 2,200 overdue assessments that were open to the agency as of November 16<sup>th</sup>, 2017.

Submitted by: Eckerd Connects  
December 1, 2017