

To: DCF Area Administrators  
Child Placing Agency Directors  
Child Welfare Agency Directors  
County Departments of Community Programs Directors  
County Departments of Human Services Directors  
County Departments of Social Services Directors  
Group Home Providers  
Tribal Social Service/Indian Child Welfare Directors  
Private Child Placing Agencies  
Residential Care Center Providers  
Shelter Care Providers  
Tribal Chairpersons

From: Fredi-Ellen Bove   
Administrator

Re: Confirming a Safe Environment when Children are Placed in Out of Home Care

## **PURPOSE**

The "Confirming a Safe Environment when Children are Placed in Out of Home Care" (CSE) procedure outlines specific requirements for Child Protective Services, Child Welfare, and Juvenile Justice workers when confirming the safety of an out of home care environment. It also defines and provides requirements for individuals serving as a designee in confirming the safety of the placement setting.

The CSE procedure supersedes all requirements for assessing safety in relative and foster care placements found in DCFS Memo Series 2006-09 "Child Protective Services Safety Intervention Standards" and DSP Memo Series 2008-07 "Assessing Safety in Foster and Relative Placements" policy.

## **BACKGROUND**

The Adoption and Safe Families Act (ASFA) identifies requirements which intend to assist States in efforts to protect and care for children who come into contact with the public child welfare system. Critical factors outlined in ASFA include consideration of a child's health and safety when placing the child in Out of Home placement.

The child welfare agency is responsible for determining safety prior to placement, in the placement setting, and at regularly established intervals. At a minimum, safety in the placement environment must be evaluated and confirmed every six months. Safety determinations are required for all children placed in an unlicensed home, foster care home, group home, or residential care center regardless of the type of court order (Child in Need of Protection or Services, Juvenile in Need of Protection or Services, or Delinquency).

## **PROCEDURAL REQUIREMENTS**

The CSE procedure creates new protocols and requirements for child welfare agencies for assessing and confirming the safety of the placement environment. This applies to all children and juveniles in Out of Home placement including those placed through a Temporary Physical Custody Order, a Voluntary Placement Agreement, and children and juveniles for which the agency maintains placement, court-ordered care, and responsibility.

A protective plan can be implemented with the child remaining in the home or outside the home. If the agency implements a protective plan, the child is temporarily out of the parental home, and parent(s) have voluntarily agreed to the plan (i.e., the agency has not taken the child into Temporary Physical Custody), then the Confirming Safe Environments procedure does not apply. If the child is out of the home temporarily, based on an agreement between the parents and the agency, the agreement does not constitute Out of Home placement and should not be entered in eWiSACWIS. Caseworkers should follow the policies and procedures set forth in the *Wisconsin Child Protective Services Safety Intervention Standards, Section II, Assessing and Controlling Present Danger Threats at the Initial Contact with Families*. The parents' signature on the protective plan indicates agreement with the plan and constitutes consent for the child to be temporarily out of the parental home. Documentation of the plan should be thorough and all participating providers in the plan should understand the identified safety threats and their role in keeping the child safe.

When an agency takes Temporary Physical Custody of a child and places the child in an unlicensed or licensed home as part of a protective plan, this should be entered as a placement in eWiSACWIS and the CSE procedure is applicable. The CSE procedure supersedes the protocol outlined in the *Wisconsin Child Protective Services Safety Intervention Standards, Section III, Safety in Out of Home Placement*.

The following is a summary of the major changes in policy and practice. More detailed information is found in the "Confirming a Safe Environment when Children are Placed in Out of Home Care" procedure.

#### **Requirements for Unlicensed Homes**

- Prior to placing a child in an unlicensed home the case worker or designee must now conduct:
  - 1) a home visit
  - 2) a reverse address Sex Offender Registry check
  - 3) a check of law enforcement or CCAP and eWiSACWIS records on all individuals 17 years of age and older residing in the identified placement home.
- If a home visit cannot be made prior to placement, the case worker or designee must make verbal contact, at the time of the child's placement, to assess and evaluate the safety of the placement setting, and conduct a home visit within 24 hours.
- A subsequent home visit must occur within 5 working days of the original placement to continue the confirming safe environments process.

#### **Requirements when Respite and Pre-Placement Visits Have Been Approved in Unlicensed Homes**

- Wisconsin law currently requires specific background checks and a home visit prior to initiating respite or pre-placement visits in unlicensed homes.
- When an Agency decides to use the home for an out-of-home placement for the child, the case worker or designee must assess and evaluate the safety of the placement environment. This includes conducting a home visit within 3 working days following placement of the child.

#### **Requirements for Licensed Foster Homes**

- Prior to placing the child in a licensed foster home, the caseworker or designee must make verbal contact with the foster parent(s) at the time of the child's placement, to assess and evaluate the safety of the placement environment.
- Within 24 hours of placement, caseworker or designee must conduct a CCAP and eWiSACWIS records check on all individuals 17 years of age and older residing in the identified placement home and a reverse address Sex Offender Registry check.
- Within 3 business days, not to exceed five calendar days, of the child's placement, the case worker or designee must conduct an initial home visit to assess and evaluate the safety of the placement setting.

- Within 7 business days following the initial home visit, the case worker or designee conducts a subsequent home visit to continue the confirming safe environments process.

### **Placement Danger Threats**

- Placement Danger Threats identify any safety concerns present in an unlicensed or foster care placement. The 17 placement danger threats are severe in nature and indicate the unlicensed or foster care placement is an unsafe environment for children in the home.
- When the case worker or designee identifies a placement danger threat they must
  - 1) address the threat if it can be immediately mitigated
  - 2) avoid using the home for placement
  - 3) remove the child if already residing in that home.
- When a placement danger threat is confirmed for a specific child, the caseworker must immediately assess the safety of all children placed in the home. To accomplish this, the caseworker collaborates with other caseworkers that have children placed in the home as well as the foster care coordinator.

### **Use of the Child and Adolescent Needs and Strengths Assessment (CANS)**

- As part of the CSE process, the CANS Assessment assists the caseworker or designee in assessing and evaluating the stability of the placement setting. When the case worker or designee rates any area a “3” on the tool for the “Current Caregiver,” placement danger threats must be reassessed for the identified child and any other children placed in the home.
- If a placement danger threat(s) is confirmed, the caseworker or designee must immediately transition the child to an alternative placement.

### **Requirements for Group Homes and Residential Care Centers**

- Prior to placement, the caseworker or designee must evaluate the safety of the group homes or residential care center by:
  - 1) ensuring the facility has the capacity to meet the child’s needs based on the child’s CANS score
  - 2) making a determination with the facility representative that the behaviors of other children, youth, or adults in the placement setting do not present a concern for the child’s safety
  - 3) address any additional needs to ensure the child is safe in the placement setting.
- At a minimum, the caseworker or designee must evaluate and confirm the safety of the environment in the group home or residential facility setting every six months while a child remains in this placement setting.

### **Risk Management Plan**

- When the behaviors of other minors or conditions in the placement setting present a risk to the child, caseworkers or designees create a risk management plan. The plan mitigates any identified risk and ensures the environment is safe for the child.

### **Designee for Confirming Safe Environments**

- A designee for confirming a safe environment must be trained to assess safety, facilitate permanence, and ensure well-being, using basic documentation about the child, family, and provider. (see below for training requirements)

The designee must obtain basic, credible information regarding the circumstances surrounding the placement of the child and the reason for placement of the child with the chosen provider. If available, the designee should reference the child’s CANS information, Safety Assessment, Analysis and Plan, and the Protective Plan.

## **Training Requirements**

The Confirming Safe Environments and Safety training will be available through the Professional Development System (PDS) and the Partnerships and will be held in regional locations. All workers responsible for confirming the safety of the placement environment must attend this training. The requirements for each type of worker are described below and summarized in the attached chart:

- Ongoing child welfare workers: Ongoing child welfare workers are required to attend the Ongoing Case Planning Training that will be available in April, 2013. This two day training will include a Confirming Safe Environment section that will meet the training requirements. Workers attending the Ongoing Case Planning Training must have completed Safety Foundation Training or the Safety Booster training less than five years ago.
- Access and Initial Assessment workers: Access and Initial Assessment workers must attend the half day Confirming Safe Environments training. Workers attending the CSE training must have completed Safety Foundation Training or the Safety Booster training less than five years ago.
- Juvenile Justice (JJ) Workers: To participate in Confirming Safe Environment (CSE) training, JJ workers (those responsible for placing children and youth in out of home care) whose documentation of completion of Safety Foundations training (2-day duration), occurred less than five years ago, may participate in CSE training. JJ workers whose record of Safety Foundation training occurred five or more years ago must complete the Safety Booster training prior to participation in CSE training. JJ workers with no documentation of completion of any Safety Foundation training must complete the Safety Foundation—half day abbreviated—training prior to participation in CSE training.
- Any person not mentioned above who is responsible for confirming the safety of a placement environment (e.g., after-hours staff, treatment foster care staff, etc.) is considered a Designee and must attend the Confirming Safe Environments training. Designee status is determined by the county agency and training requirements are the same as required for JJ workers if the designee is responsible for the placement of a child/youth in OHC.

Workers who attended one of the Confirming Safe Environments Pilot Trainings have met the CSE training requirement and do not need to attend a subsequent CSE training. The Division of Safety and Permanence is working with UW Training Partnerships to ensure there is adequate and convenient training available for all counties. Information regarding the prerequisite training and the CSE training will be published on the PDS on-line website. The schedule of available training sessions for each type of training will be published by each of the Regional Partnerships and PDS in the near future.

## **eWiSACWIS DOCUMENTATION**

The Confirming Safe Environments documentation in eWiSACWIS replaces the Out of Home Safety plan. In the eWiSACWIS system, two versions of the CSE exist: one for Foster/Unlicensed Placement Homes and the other for Group Homes/Residential Care Centers.

Information from the CSE process must be entered in eWiSACWIS within 10 days of placing the child in out-of-home care. Information from this page pre-fills to the permanency plan.

## **ACTION SUMMARY**

Effective immediately, "Confirming a Safe Environment when Children are Placed in Out of Home Care" (CSE) procedure is in full effect, for Child Protective Services and Child Welfare workers when confirming the safety of an out of home care environment.

Because the procedure identifies new training requirements for designees, the CSE procedure is not effective for designees until the designee completes the minimum training requirements specified above. Upon successful completion of the training, the CSE policy is in effect for the designee. Designees should complete their training as soon as possible, but no later than March 2014. Until a designee

completes the training, the designee should operate under the DCF Memo Series 2006-09 "Child Protective Services Safety Intervention Standards" and DSP Memo Series 2008-07 "Assessing Safety in Foster and Relative Placements" policy.

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MEMO WEB SITE: <https://dcf.wisconsin.gov/cwportal/policy>

Attachments:

CSE and On-going Planning Training Requirements

Designee for Confirming Safe Environment, Ongoing Standards

Confirming a Safe Environment when Children are Placed in Out of Home Care (Ongoing Standards)  
<https://dcf.wisconsin.gov/files/cwportal/policy/pdf/ongoing-services-standards.pdf>

### CSE and On-Going Case Planning Training Requirements

Worker Type	Training Type				
	Safety Foundation 2 days	Safety Foundation- half day abbreviated+	Safety Booster 1 Day	Confirming Safe Environments (CSE) half day	On-Going Case Planning Training with CSE 2 days
On-Going CW	X		X*		X
Access/IA CW	X		X*	X	
JJ Worker		X*	X**	X	
Designee <sup>^</sup>		X <sup>^</sup>	X <sup>^</sup>	X	

**Notes:**

\* **Ongoing, Access and Initial Assessment workers**- must complete the Safety Booster training if five or more years lapsed since completion of the Safety Foundation Training.

\*\* **JJ workers**- To participate in Confirming Safe Environment (CSE) training, JJ workers (those responsible for placing children and youth in out of home care) whose documentation of completion of Safety Foundations training (2-day duration), occurred less than five years ago, may participate in CSE training. JJ workers whose record of Safety Foundation training occurred five or more years ago must complete the Safety Booster training prior to participation in CSE training. JJ workers with no documentation of completion of any Safety Foundation training must complete the Safety Foundation—half day abbreviated—training prior to participation in CSE training.

<sup>^</sup> **Designee**- status is determined by the county agency and training requirements are the same as required for JJ workers if the designee is responsible for the placement of a child/youth in OHC.

+ Safety Booster is a safety training alternative for workers in receipt of Safety Foundation training 5 or more years ago. This training is available now.

## Designee for Confirming Safe Environments

In cases where someone other than the Ongoing Services worker is responsible for confirming the safety of an out of home care environment, that individual (designee) must be trained to assess safety, facilitate permanence, and ensure well-being, using basic documentation about the child, family, and provider. At a minimum, the designee must complete Safety Foundation Training. By March 1, 2014, the designee must also complete the Confirming Safe Environments Training. The designee must obtain basic, credible information regarding the circumstances surrounding the placement of the child and the reason for placement of the child with the chosen provider. If available, the designee should reference the child's CANS information, Safety Assessment, Analysis and Plan, and the Protective Plan.