

PA CFSR QUALITY ASSURANCE BRIEF

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General Issues – Interviews

First level QA consulted 2nd level QA because the provider for an in-home case was not on the interview list. The concern was that since the case was only open in the county for two months during the PUR prior to the case being transferred to another county, the provider might need to be scheduled for an interview. We discussed that the CFSR reviews the case from the statewide perspective and that the PUR does not end when the case is transferred to another county. The first level QA specialist will inquire whether the case is still open or how long the case was open in the other county. This information will determine if the two counties need to coordinate to plan additional CFSR activities/interviews so that reviewers will be able to thoroughly review the entire PUR.

CFSR Project Managers confirmed with the review county that the county closed the case due to the family moving, but because the court was not involved and this was a case opened voluntarily related to GPS concerns, the agency did not “transfer” the case to the neighboring county to which the family moved during the PUR. The service provider the family was using in the review county also provided services in the neighboring county and the family indicated interest in continuing these services. The review county provided a letter to the family explaining how services could be accessed in the neighboring county at the time of case closure.

Per the General Question FAQs, reviewers must rate the case based on case practice that occurred during the entire period under review, regardless of which county or office was responsible for the case at the time of the review. The review focuses on statewide practice, and review findings reflect the outcomes for children and families that were achieved during a set period of time (period under review). States have the option of documenting county/office-specific issues in the open narrative field for each item if they would like to note specific concerns due to changes in county/office case assignments. In this case, any case activity that might have occurred with the neighboring county children and youth agency during the PUR would need to be considered in the assessment and rating of the case.

For this particular case, CFSR Project Managers consulted with State Site Coordinators who were able to confirm a GPS report was received on the family during the PUR in the neighboring county, however the concerns were assessed to be invalid and the case was not opened for services. Case dictation and other documentation pertaining to this report were accessed electronically and made available to the reviewers, which included the actual report and safety assessments. The reviewers should review the information provided to determine if they feel an interview with the intake supervisor from the neighboring county is necessary to inform their rating of the Safety Items in the OSRI. If they believe an interview is needed, they should connect with one of the state site coordinators, to see if they can arrange to speak to the intake supervisor briefly.

How should situations be handled where there are multiple children in the home and one of the children is not seen/interviewed during their scheduled time? For example, in one case, reviewers are going out to home to see six children. What if one of the children is not home at the time of the interview?

Per the CFSR Procedures Manual, interviews should be conducted with children age 6 and older for the CFSR. Therefore, every effort should be made to conduct interviews with all children in

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the home who are 6 or older. If reviewers are unable to conduct an interview with a child, they should immediately alert their assigned first level QA to discuss whether alternate interviews may be needed to gain the child's perspective. First level QA should engage reviewers in discussion about what items they would need to rate the child on and consider whether there is sufficient information that can be gleaned from the case record and other interviews to appropriately assess relevant OSRI items. If reviewers and first level QA determine an additional interview may be needed, reviewers should contact the local site coordinator to see if an interview with the child can be rescheduled or to determine if there is another individual who can speak to the child's perspective (i.e. Guardian ad Litem, service provider, etc.). If an additional interview is needed but cannot be secured, first level QA should alert second level QA and CFSR Project Managers to discuss whether the case may meet criteria for exclusion.

Do you need documentation to back up all information that is shared through interviews? How do you make a determination of when you need verification versus when you do not?

With regards to this question, it should first be acknowledged that for the purposes of the CFSR, interviews and case documentation are weighed equally with regards to how information is considered when applying the OSRI to rate a case. First level QA should encourage reviewers to try to resolve any discrepancies between information gathered through interviews and information obtained through the case record review and alert first level QA if there are discrepancies reviewers are struggling to resolve. The case review process does not require that reviewers go through the entire file to verify the information from every interview; however reviewers should try to review the file prior to conducting their interviews and utilize the interview process as a method for confirming or clarifying information obtained through review of the case record. Reviewers will need to use their best judgement given the particular circumstances of the case to determine whether they may need to go back to the case file to verify any information obtained through interviews. If new information is learned that the reviewers were unaware of during interviews, they should consider going to the case file to search for any additional documentation that would verify, support or clarify what was learned through the interview. For example, if reviewers did not see any information about needs assessments in the case record, but through an interview with the caseworker learned that the caseworker informally assessed child/parent needs during case visits, reviewers could review case dictation to see if the caseworker alluded to these informal assessment discussions, ask follow-up questions regarding the nature of how these needs were assessed during the visits when interviewing the caseworker, and consider whether services were offered that clearly matched the child/parent's needs to help gain further clarity related to the use of informal assessments rate the case on items pertaining to assessment of needs of children/parents and quality of caseworker visits.

General Information – Item Ratings Rated N/A

Second level QA advised first level QA to ask reviewers to provide a brief rationale for N/A items in the optional QA note. First level QA advised that they had informed their reviewers to remove these notes. First level QA expressed concern that this direction was not provided in the training.

For those OSRI items that are rated as N/A, there will need to be some form of narrative/content that reflects the reason why the item rating is N/A. This narrative/content can be in: 1) an item QA note; 2) the 'optional' text box at the conclusion of the case applicability questions; or 3) the Item Rating rationale. The narrative(s) justifying item ratings that are N/A are to be written by reviewers and not QA specialists, as reviewers are the ones that need to make the N/A

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determination. Also, CFSR project managers have made a note regarding this clarification, so that this information can be bolstered in CFSR reviewer training.

General Information – QA Notes

Who is responsible for resolving QA notes from second level QA? It is helpful for first level QA to review and resolve QA notes from second level QA so review teams know what QA notes they need to address.

~~Based on the request, first level QA can proceed with resolving all QA notes from 1st and 2nd level QA as they determine that they have been adequately addressed. Second level QA can apply the filter function in the OMS to filter the QA notes to review only those notes which they created. This process will be tested out during the first review in Butler with opportunities to revisit and re-adjust the process based on feedback from QA staff.~~

(NEW) Second Level QA specialists are to resolve their own QA notes. Each individual who creates a QA note is responsible for resolving their own QA note. First level QA specialists are to review the edits/updates made by reviewers in response to the QA notes from Second Level QA to ensure all aspects of the QA note are addressed before sending the case back to Second Level QA, but it is the responsibility of Second Level QA to resolve their QA note within the OMS system.

First level QA asked second level QA the following question: Based on the guidance provided earlier today, if a QA note provides an explanation for an item being rated NA, can the QA note be written by the QA specialist? Second level QA answered “no, as the reviewers are the individuals who need to apply the OSRI judgement.” Second level QA relayed that this was second level’s best thinking, but acknowledged there is nowhere written in our manual that this is the protocol as the guidance for NA rationales as it was just provided to the onsite team during the first review.

Correct. The narrative(s) justifying item ratings that are N/A are to be written by reviewers and not QA specialists, as reviewers are the ones that need to make the N/A determination.

Face Sheet

Second level QA advised first level QA to ask reviewers to provide more information in participant table in relationship to child column such as dates of child in a particular foster or pre-adoptive home and date of TPR for parents.

Thank you for submitting this to us, as having that additional contextual information in the case participant table is indeed very helpful for the review/QA of an OSRI. NOTE: If this is just a one case-specific situation, then this can be addressed by 2nd level QA via QA note to the review team. If this is a situation in which 2nd level QA has had to address this multiple 1st level QA staff, then we will want to proceed with sharing this clarification during a QA debriefing.

Second level QA was consulted to determine if a cousin who lives in the kinship home needs to be listed in the child table on the face sheet. Second level QA confirmed that the table only lists children who are living in the home of origin.

Thank you for informing us of the additional guidance that was provided by 2nd level QA to 1st level QA. The guidance provided, as you know, is correct per the OSRI instructions for Table G1.

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This issue was raised during Monday QA debrief regarding the Face Sheet and determination of the date of case opening. The question presented to the group involved which date the reviewers should utilize as the case opening date when there are multiple children from a family who are opened at multiple different times prior to or during the PUR.

As discussed during the Monday QA debrief, the OSRI specifically asks about cases opened with the "family." Therefore, the earliest date of case opening would include the first date that a case was opened for any child in the family. It was also reiterated that the case open date should be the date that the case was opened and accepted for services.

Should non-siblings be included on the face sheet in the child participant table?

Per the OSRI instructions, for both foster care and in-home services cases, enter the names of all children in the family identified in the case file. If a child in the home is identified in the case file or in other case family documents in the record, the child should be considered for inclusions in the child participant table. The inclusion of the child is not contingent upon relationships to other children in the home or the target child in foster care.

For a case in which there is a sibling who turned 18 during the PUR, should they be included on the child table or the participant table?

According to the directions set forth in the OSRI, for both foster care cases and in-home services cases, reviewers should enter the first and last names of all children in the family as identified in the case file. In this particular instance, if at any time during the PUR, the sibling was under age 18 (met definition of child under federal standards) and identified as part of the family in the case file, the sibling should be included in the child participant table.

Safety- Item 2B

We experienced an impasse between first and second level QA on a case for Item 2b. The situation was that after the target child went into agency custody due to safety concerns present in the home, there were three children left in the home who were not provided safety related services. Item 3 is an ANI because this safety issue in the home was not adequately addressed by the agency. Prior to answering Question 2B, the OSRI's item instructions ask reviewers to consider if "the child was not removed from the home during the period under review". Marking this question yes, makes question 2B Not Applicable. I provided the above guidance, but the first level QA didn't understand/agree my instructions. The project manager provided the QA specialists guidance on rating this item.

When 2nd level QA and 1st level QA come to an impasse on question and/or item rating, it is appropriate to contact the CFSR project manager(s) for consultation. The CFSR project manager(s) are to provide direction to resolve the impasse. In the case scenario referenced in this instance, it is relevant to provide the additional context that Item 3 was rated as ANI and the rationale supported that rating, as concerted efforts were not made to assess and address risk/safety concerns for the target child and the target child's siblings who remained in the home. Question 2A was answered "No" because the agency didn't make concerted efforts to provide or arrange for appropriate services for the family to protect the children and prevent their entry into foster care. In this case, the target child was removed from the home. For the target child in this case, it was indeed possible that "the circumstances of the case and of the removal suggest that services would not have been able to ensure the child's safety if the child remained in the home." So, while the information gathered through the review process may indeed have indicated that it was necessary to remove the target child immediately to ensure

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her safety, the answer to Question 2B could not be "Yes" because in addition to the target child, there were three additional children remaining in the home who were not removed from home. Therefore, the second bullet of Question 2B instructions states, "If the child was not removed from the home during the period under review, the answer to question be should be Not Applicable." While the second bullet references "**the** child was not removed from the home," question 2B, does consider whether "**any** child was not removed from the home without providing for or arranging for services." Therefore, this case circumstance requires the answer to question 2B should be N/A. In this situation, bullet #3's guidance for question 2B may apply to the target child, but bullet #2's guidance for question 2B applies to the other children that were in the home. Because question 2B looks at all the children in the home, it is necessary to follow the instruction from bullet #2 and respond N/A, as there were children that were not removed from the home. Therefore, with question 2A being "No" and question 2B being "N/A," the results in the Item 2 rating being ANI.

Well-Being Item 12

Second Level QA was consulted by 1st level QA to determine if a need for housing for a family is identified under 12a or 12b. The 2nd level QA specialists conferred and guided the reviewers to critically think through each of the parents' assessment and needs and the child's assessment and needs. The service should correspond to the individual's need. We discussed the need to consult the FAQs to ensure there is no additional guidance as to how to identify such a family need where it could lead to duplication of documentation. The ACF representative overheard the discussion and told second level QA, there is no FAQ and that typically housing services get identified in 12b (parent) because a child is not responsible for obtaining their own housing. Second level QA subsequently relayed this information to first level QA.

Thank you for guiding the 1st level QA through the process for critically thinking about assessment of needs and services provided for Item 12a and 12b, as well as for encouraging reviewers to reference FAQ's. It is also possible that based on the circumstances of the case and the immediacy of the family's housing needs, housing services/support may also connect to safety items and therefore be relevant to Item 2.

Tips and Tricks Learned from Onsite Reviews

Both first level QA and second level QA ran into issues regarding communicating through QA notes to reviewers. There was some confusion on the part of the reviewers when the first or second level QAs attempted to provide context or explain the reason for the QA (in an attempt to teach, especially when doing QA at night when direct conversation is not possible). However, when the reviewers go back to the OSRI to make the changes, there is confusion regarding the exact change is needed. This resulted in reviewers answering and documenting in the rationales critical thinking or context questions (that are only meant to inform an OSRI item questions). From now on, in serving as second level QA, I will try to only use QA notes to give a direct instruction.