



OFFICE OF CHILDREN, YOUTH AND FAMILIES BULLETIN

COMMONWEALTH OF PENNSYLVANIA * DEPARTMENT OF PUBLIC WELFARE

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July 1, 2012

SUBJECT:

Statewide General Protective Services (GPS) Response Times

BY:

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Deputy Secretary

SCOPE:

COUNTY CHILDREN AND YOUTH SOCIAL SERVICE AGENCIES
PRIVATE CHILDREN AND YOUTH SOCIAL SERVICE AGENCIES
JUVENILE COURT JUDGES' COMMISSION
ADMINISTRATIVE OFFICE OF PENNSYLVANIA COURTS
JUVENILE COURT JUDGES
COUNTY CHILDREN AND YOUTH SOLICITORS
COUNTY CHILDREN AND YOUTH ADVISORY COMMITTEES
PENNSYLVANIA CHILDREN AND YOUTH ADMINISTRATORS ASSOCIATION
COUNTY COMMISSIONERS
HUMAN SERVICE DIRECTORS
COUNTY FISCAL OFFICERS

PURPOSE:

The purpose of this bulletin is to transmit to public children and youth agencies (herein referred to as county agencies) requirements related to a statewide policy establishing response times for reports made to county agencies that are designated as General Protective Services (GPS) reports. It is strongly recommended that county staff participate in the web-based training to begin implementation of the intervals July 1, 2012. **County agencies that already have policies related to response times for GPS reports that go beyond the policy contained in this bulletin are permitted to continue with their individual agency policy.**

COMMENTS AND QUESTIONS REGARDING THIS BULLETIN SHOULD BE DIRECTED TO:

OCYF Regional Offices

ORIGIN OF BULLETIN:

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BACKGROUND:

In 2008, Pennsylvania underwent its second Federal Child and Family Services Review (CFSR). During this review, Pennsylvania was found to be "not in substantial conformity" with Safety Outcome 1 (children are, first and foremost, protected from abuse and neglect). Of the cases reviewed, 57.7% were found to be "substantially achieved" with this outcome. Within this outcome, Item 1 (timeliness of initiating investigations of reports of child maltreatment) was an item in which Pennsylvania was rated as "area needing improvement." To compare, during the first CFSR in 2002, Safety Outcome 1 was found to be "substantially achieved," and Item 1 was found to be a "strength."

To meet the requirements of the Program Improvement Plan (PIP), the Office of Children, Youth and Families (OCYF) surveyed the county agencies to gather their individual policies related to response times for GPS reports. A draft policy was developed by OCYF based on the survey responses. This draft policy was distributed to the county agencies for comment in early 2011.

Many of the comments received by OCYF stated that it would be difficult for county agencies to meet the requirements of the draft policy. At this point, OCYF decided to convene a workgroup of county agency and OCYF staff to develop a statewide policy (see Attachment A for listing of workgroup). The workgroup convened July 19, 2011 to develop the statewide policy contained in this bulletin. As a result of all the feedback received, the workgroup determined that counties would be able to meet these guidelines.

In addition, guidelines are to be developed related to transitioning reports which were originally assigned as GPS reports to Child Protective Service (CPS) reports when necessary. This strategy can be found as Strategy 1.1 in the PIP. These guidelines will be distributed through another document.

DISCUSSION:

After receipt of a report of a child in need of protective services, county agencies must make an immediate decision about how and when to respond to the report. This assignment of the GPS response time should be clearly documented in the record.

Sometimes reporting sources are reluctant or unable to provide detailed information at the time the report is being made. However, the county agency must make every reasonable attempt to uncover potential present and/or impending threats to a child's safety that may not be clearly evident.

County agencies are encouraged to ask thought-provoking and information-seeking questions of reporting sources in order to uncover all available information regarding child safety that will lead them to make appropriate decisions regarding response time. Consistent with the requirements of the In-Home Safety Assessment and Management Process, the six domains related to information gathering are to be addressed when receiving a report. The six domains related to information gathering include:

- Type of maltreatment;
- Nature of the maltreatment;
- Child functioning;
- Adult functioning;

- General parenting; and
- Parenting discipline.

It is important that county agencies utilize the six domains related to information gathering to assess the safety of a child and determine the most appropriate response time. A valid assignment of GPS response time is predicated upon comprehensive information gathering. It often entails going beyond the circumstances of the maltreatment and the underlying motivations of an individual making a report.

There are many factors to consider when assigning a response time that goes beyond just the reason the report is being made. To develop a policy based on "blanket" examples for response times may cause county agencies to miss other important factors that contribute to child safety. For example, a report about a healthy, appropriate 12 year old being left home alone who knows how to call for help if needed should elicit a different response time than a 12 year old with significant physical, developmental, or behavioral health limitations being left home alone. To simply base a response time on the fact that a 12 year old is left alone may cause important factors with regards to child safety to be missed and an inappropriate response time to be assigned.

In the spirit of completing more thorough assessments and truly better understanding children and families, the workgroup that developed the response time policy felt that the response times should be based on the In-Home Safety Assessment and Management Process Safety Threats and the Risk Factors from the Pennsylvania Risk Assessment Model. Additionally, by taking this approach, county agencies are assigning response times based upon an assessment methodology that is uniform in nature with consistent statewide application.

Consistent with the In-Home Safety Assessment and Management Process, the following is a list of potential present danger threats:

- Maltreatment
 - Maltreating Now
 - Face / Head
 - Serious Physical Injury
 - Premeditated
 - Several Victims
 - Life Threatening Living Arrangements
 - Unexplained Injuries
 - Bizarre Cruelty
 - Sexual Abuse
- Child
 - Parent's Viewpoint of Child is Bizarre
 - Vulnerable Child is Unsupervised or Alone for Extended Period
 - Child Fearful
 - Child Needs Medical Attention
- Parent
 - Parents Are Unable to Perform Parental Responsibilities
 - Parents Described as Dangerous
 - Parent Out of Control
 - Parent Intoxicated

- Spouse / Partner Abuse Present
- Family Will Flee

These potential present danger threats have direct connections to the 14 safety threats which are assessed during the In-Home Safety Assessment and Management Process. The following is a list of the 14 safety threats that are assessed during the In-Home Safety Assessment and Management Process:

- Caregiver(s) intended to cause serious physical harm to the child.
- Caregiver(s) are threatening to severely harm a child or are fearful that they will maltreat the child.
- Caregiver(s) cannot or will not explain the injuries to a child.
- Child sexual abuse is suspected, has occurred, and/or circumstances suggest abuse is likely to occur.
- Caregiver(s) are violent and/or acting dangerously.
- Caregiver(s) will not or cannot control their behavior.
- Caregiver(s) reacts dangerously to child's serious emotional symptoms, lack of behavioral control, and/or self destructive behavior.
- Caregiver(s) cannot or will not meet the child's special, physical, emotional, medical, and/or behavioral needs.
- Caregiver(s) in the home are not performing duties and responsibilities that assure child safety.
- Caregiver(s) lack of parenting knowledge, skills, and/or motivation presents an immediate threat of serious harm to a child.
- Caregiver(s) do not have or do not use resources necessary to meet the child's immediate basic needs which present an immediate threat of serious harm to a child.
- Caregiver(s) perceive child in extremely negative terms.
- Caregiver(s) overtly rejects county agency intervention; refuses access to a child; and/or there is some indication that the caregivers will flee.
- Child is fearful of the home situation, including people living in or having access to the home.

Consistent with the Pennsylvania Risk Assessment Model, the following is a listing of risk factors:

- Child Factors:
 - Vulnerability
 - Severity / Frequency and / or Recentness of Child Abuse
 - Prior Abuse / Neglect
 - Extent of Emotional Harm
- Caregiver / Household Member / Perpetrator Factors:
 - Age, Physical, Intellectual, or Emotional Status
 - Cooperation
 - Parenting Skill / Knowledge
 - Alcohol / Substance Abuse
 - Access to Children
 - Prior Abuse / Neglect

- Parental Relationship to Child
- Family Environment Factors:
 - Family Violence
 - Condition of the Home
 - Family Supports
 - Stressors

POLICY:

Section 6375 of the Child Protective Services Law (CPSL) (relating to county agency requirements for general protective services) and §3490.232 (relating to receiving reports and assessing the need for services), require the county agency see the child immediately if emergency protective custody has been taken, is needed, or if it cannot be determined from the report whether or not emergency protective custody is needed. Otherwise, the county agency shall prioritize the response time for an assessment to assure that children who are at most risk receive an assessment first.

The following are response times related to reports assigned as GPS reports. As previously discussed, these response times are based on information gathered related to the In-Home Safety Assessment and Management Process and the Risk Assessment Model:

1. **Immediate:** The information reported indicates that a Present Danger exists which, by definition, meets the Safety Threshold. In order to reach the safety threshold, a condition must meet all of the following criteria: have potential to cause serious harm to a child; be specific and observable; be out-of control; affect a vulnerable child; and be imminent. Present Danger is defined as an immediate, significant, and clearly observable threat to a child actively occurring in the present.
2. **Priority (Within 24 hours):** The information reported indicates that an Impending Danger exists which meets the Safety Threshold and/or the information reported indicates that overall Risk Factors rated as high exist, which place the child in danger of future harm. An Impending Danger refers to threatening conditions that are not immediately obvious or currently active or occurring now but are out-of-control and likely to cause serious harm to a child in the near future. The information reported does not indicate the existence of Present Danger.
3. **Expedited (Within 3-7 calendar days):** The information reported indicates that overall Risk Factors rated as moderate exist, which place the child in danger of future harm. The information reported does not indicate that Present or Impending Danger exists and does not meet the safety threshold.
4. **General/Other (Within 7-10 calendar days):** The information reported indicates that overall Risk Factors rated as low exist, which may place the child in danger of future harm. The information reported does not indicate that Present or Impending Danger exists and does not meet the safety threshold.

When a response time is assigned, county agency staff must make reasonable efforts to establish face-to-face contact with the identified child within the assigned response time. Ideally, the identified child or children and their primary caregiver(s) should be seen within the response time so that an appropriate assessment of safety can be completed. However, consistent with the In-Home

Safety Assessment and Management Process, there may be instances when county agency staff must make the immediate, preliminary assessment and safety decision without seeing both the child and the primary caregiver in order to assure child safety. This would lead to the development of an immediate, preliminary safety plan. When this happens, the county agency staff must make reasonable efforts to see the other household members and persons involved with the case, including children, involved in the case within the 72 hour time period for the safety assessment worksheet to be completed. If during the process of the preliminary assessment of the identified child, the threshold of present or impending danger is not met; county agency staff must continue to make reasonable efforts to see the other household members and persons involved with the case, including children involved in the case within the 72 hour time period for the safety assessment worksheet to be completed.

Section 3490.232 (relating to receiving reports and assessing the need for services) requires that throughout the period of assessing the family for services, all household members and any other interested parties with knowledge of the family must be contacted in order to thoroughly assess and manage the safety of the child or children. However, all of these individuals do not have to be seen or contacted during the response time period.

Training:

Additionally the PIP includes a requirement that training be developed and delivered to county agencies and OCYF Regional Offices. OCYF has worked with the Child Welfare Resource Center (CWRC) to develop an electronic training that can be taken at the user's own pace; thereby leaving county agencies and OCYF Regional Offices the flexibility to take the training when able. The training will be tracked through ENCOMPASS at CWRC and will be incorporated into Charting the Course as appropriate.

Ideally, all county agency staff and OCYF Regional Office staff should take the training. However, those staff who make decisions regarding response times, are a part of assigning response times or respond to reports must take the training. It is important to remember to include those county agency staff that cover emergency duty, but normally do not receive referrals or respond to referrals as part of their overall job duties at the county agency, since they may make decisions about response times during their emergency duty work.

Attachment A

GPS RESPONSE TIME WORKGROUP

Sarah Finkey	Adams County
Bruce Noel	Allegheny County
Lisa Eshbach	Berks County
Kirin McCaulley	Blair County
Marie Alexander	Blair County
Mark Castrantas	Bucks County
Joe Szewczyk	Cambria County
Michelle Rager	Cambria County
Michele Shannon	Cambria County
Karyn Koons	Chester County
Marta Wajert	Chester County
Lynnette Klinger	Lehigh County
Deborah Maggs	Lycoming County
Andrew Hornak	Montgomery County
Craig Patterson	Montour County
Mary Beth Jacavage	Northampton County
Patricia Himmelwright	Northampton County
Darlene Adams	Philadelphia County
Jessica Shapiro	Philadelphia County
Melissa Hanlon	Schuylkill County
Sharyn Wetzel	Schuylkill County
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