

# DCF Fiscal Impact and Policy References on Child Welfare System Task Force Recommendations



December 4, 2018

The following information is being provided by the Kansas Department for Children and Families (DCF) in response to recommendations made by Child Welfare System Task Force Working Groups.

## DCF Responses to Working Group A

- A1.1** The State of Kansas, the Kansas Department for Children and Families and its service providers shall increase base salaries for market competitiveness for both classified and unclassified staff and shall implement a tiered compensation system based upon merit, years of experience, education and licensure with clearly-defined titles, roles and responsibilities. **Response:** Pursuant to the Governor's initiative to conduct a top-to-bottom review of the agency, the agency is reviewing all positions to ensure clearly defined titles, roles and responsibilities across the regions. We are looking at the issue of compensation and salary increases as part of this work. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$7,931,000	\$7,619,312

**Note:** All Fiscal Impact amounts in this document are for the current three-year budget cycle unless otherwise noted. (FY19-FY20)

- A1.2** The State of Kansas, the Kansas Department for Children and Families and its service providers shall increase recruitment and retention of social workers and child welfare professionals by offering financial incentives such as student loan forgiveness, tuition reimbursement, free continuing education units (CEUs) and other incentives and shall conduct an annual survey to determine which incentives are utilized and if other options should be offered. **Response:** DCF pays for CEU's, as well for license renewals and the licensing test for new graduates. Additionally, the agency works regularly with the BSRB to provide CEU opportunities. DCF continues to evaluate workforce needs, including recruitment and retention. Due to recent DCF initiatives, the child welfare staff vacancy rate has dropped from 20.7 percent to 8 percent. As an alternative to the annual survey, employees have direct access to provide anonymous suggestions to the Secretary at all times throughout the year. Partial loan forgiveness is available through the federal government. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- A1.3** The State of Kansas, the Kansas Department for Children and Families and its service providers shall offer a flexible work schedule to manage cases effectively and allow time for self-care and work-life balance. **Response:** DCF

has allowed and encouraged flexible schedule when it meets both staff and agency needs. Personnel Policy K.A.R. 1-5-28, Section No. 6-1, addresses flex time: Flex time is a consistently recurring work schedule that differs from the routinely expected work schedule of a position. Appointing Authorities have the discretion to approve flexible work schedules providing the workday continues to be 8 hours and the workweek continues to be 40 hours. Flexible work schedules that deviate from the standard workday or workweek must be approved by the appropriate Executive Committee member and addressed to DCF Office of Personnel Services. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

- A1.4** The State of Kansas and the Kansas Department for Children and Families shall require front-end staff, at minimum, to receive an intensive, evidence-based training on identifying abuse/neglect, effectively responding, and understanding resulting trauma on the child and family. This should be separate from initial training and ongoing resources should also be made available. The State of Kansas and the Kansas Department for Children and Families shall adapt a similar training on abuse and/or neglect for other providers such as, but not limited to, law enforcement, school social workers, hospital social workers, and public health nurses. **Response:** DCF offers a variety of trainings to meet the varied needs of our workforce, including trainings about identifying abuse or neglect. DCF already collaborates with providers and our stakeholders and we share resources around training. Although, the agency is not aware of an evidenced-based training of this nature. DCF agrees with this recommendation. DCF is currently in the process of updating our trainings to include information about resulting trauma, not only about being victims of child abuse or neglect, but the trainings will also cover trauma related to being removed from one's biological family.

**Fiscal Impact:**

	<b>All Funds</b>	<b>State General Funds</b>
<b>Unfunded</b>	<b>\$1,500,000</b>	<b>\$1,500,000</b>

- A2.1** The Kansas Department for Children and Families shall grant access to the system at different levels to stakeholders to increase efficiency at all levels as well as create reports with consistent data across agencies and regions throughout the state. **Response:** Current child welfare providers have access to current DCF systems. Moving forward with the Comprehensive Child Welfare Information System (CCWIS), access will be enhanced and information sharing will be improved, as is allowable by law. **Fiscal Impact:**

	<b>All Funds</b>	<b>State General Funds</b>
<b>Unfunded</b>	<b>\$51,250,000</b>	<b>\$25,625,000</b>

\*CCWIS project costs span five years. (FY20-FY24)

- **A2.2** The State of Kansas, the Kansas Department for Children and Families and its service providers shall invest in technology to make case work more mobile and efficient. **Response:** *DCF continuously implements this recommendation, but its current systems inhibit mobility and efficiency. As DCF moves forward with the CCWIS system, mobility and efficiency will improve and will be key elements.* **Fiscal Impact:** *See A2.1 table for CCWIS costs.*
- **A2.3** The State of Kansas shall collaborate with contractors and other stakeholders to leverage best practices with their existing systems and develop standards for the new system. **Response:** *DCF agrees with this recommendation and is doing this now through various initiatives. The agency is in the process of implementing a Placement Matching System, and DCF will collaborate with our child welfare partners as this is brought online to ensure a seamless system.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **A2.4** The State of Kansas shall require data sharing among all agencies involved in foster care child placement so that all share responsibility of placing a child in a home and the exchange of information about the child and all available foster homes is made available. This needs to be monitored by DCF in collaboration with the Chief Information Technology Officer (CITO) and the Joint Committee on Information Technology (JCIT). **Response:** *DCF agrees with this recommendation and is doing this now through the Placement Management System, which takes effect July 1, 2019. The agency has had meetings with all of the CPAs and will continue to collaborate as the system is brought online.* **Fiscal Impact:** *No fiscal impact as this will occur within resources.*
- **A3.1** The State of Kansas shall coordinate an automatic enrollment process to ensure no enrollment requirements are placed on the youth and young adults under age 26 years. **Response:** *This is an issue that will need to be addressed by the Legislature or our sister agencies.* **Fiscal Impact:** *No fiscal impact can be determined at this time.*
- **A3.2** The State of Kansas shall prepare an annual report comparing the range of possible behavioral health codes for reimbursement of services in Kansas, determine options that will comprehensively meet behavioral health needs for foster care children and review the behavioral health codes for reimbursement through the Medicaid state plan. **Response:** *There has long been a conversation about behavioral health codes and this is an issue that will need to be addressed by the Legislature or our sister agencies.* **Fiscal Impact:** *No fiscal impact to DCF.*

- **A3.3** The State of Kansas shall explore revisions to the current level of care guidelines and consistent interpretation of criteria for admission, continued stay and discharge (PRTF and Acute Inpatient) to create a more detailed statewide criterion that will ensure foster care children receive appropriate discharge planning. **Response:** *DCF will continue to have conversations around PRTF's with our sister agencies.* **Fiscal Impact:** *No fiscal impact can be determined at this time.*
- **A3.4** The State of Kansas shall expand evidence-based processes as defined National Registry of Evidence-Based Programs and Practices (NREPP) / Substance Abuse and Mental Health Services Administration (SAMHSA) for children's services across the continuum of care for all KanCare eligible families whose children have severe emotional disabilities. **Response:** *DCF will pass along this recommendation to our sister agencies.* **Fiscal Impact:** *No fiscal impact to DCF.*
- **A3.5** Increase access to early childhood mental health services by including language in state Medicaid behavioral health plans to explicitly cover early childhood mental health screening, assessment and treatment. **Response:** *DCF will pass along this recommendation to our sister agencies.* **Fiscal Impact:** *No fiscal impact to DCF.*
- **A3.6** The State of Kansas shall explore establishing a position(s) of Foster Care Systems Navigator to improve coordination and care, strengthen communication and alignment with the Kansas Department for Children and Families and examine existing and potential health strategies for foster youth. **Response:** *DCF has a Medicaid liaison to help coordinate services alongside MCOs. The DCF Medicaid Liaison works with the State agencies (KDHE, KDADS, KDOC-JS), Tribes, KanCare MCO's, DCF eligibility specialists, child welfare contractors and KEES staff to develop strategies and help resolve medical and behavioral coordination issues at the lowest level possible for children in foster care, children returning home and youth aging out up until the age of 26. This includes Medicaid HCBS waiver programs which are designed to prevent children from being placed in an institution or State Hospital. It should also be noted, each MCO has a specific foster care liaison as well. Additionally, each DCF Region has a foster care liaison and DCF has a foster care ombudsman.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **A3.7** The State of Kansas shall conduct a cost benefit analysis of service delivery by a single MCO with an opt-out provision on a case-by-case basis. **Response:** *DCF will pass along this recommendation to our sister agencies.* **Fiscal Impact:** *No fiscal impact to DCF.*

- **A4.1** The Office of the Child Advocate shall convene regional stakeholder meetings, which should include current or former recipients of services, with a designated facilitator utilizing an appropriate facilitation model (to share experiences, insights and identify solutions). **Response:** *The Office of Child Advocate bill is going through the Office of Judicial Council. DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. Under the new grants and contracts, the Secretary has established an advisory board made up of multiple stakeholders, who will report directly to the Secretary.* **Fiscal Impact:**

	<b>All Funds</b>	<b>State General Funds</b>
Unfunded	\$1,197,000	\$1,101,000

- **A4.2** The Office of the Child Advocate shall evaluate training and provide subject matter expertise including content specifications, competency expectations and documentation of learning rather than documentation of perceived value of the training. **Response:** *The Office of Child Advocate bill is going through the Office of Judicial Council. DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.* **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.3** The Office of the Child Advocate shall review relevant policies and procedures, recruitment and retention as well as salaries for employees and contract and financial status of the agencies and contractors. **Response:** *The Office of Child Advocate bill is going through the Office of Judicial Council. DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.* **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.4** The Office of the Child Advocate shall fulfill the role of ombudspersons for current and former recipients of services. **Response:** *The Office of Child Advocate bill is going through the Office of Judicial Council. DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.* **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.5** The Office of the Child Advocate shall monitor the use and development of technology to efficiently access and share case information between the Department for Children and Families and all stakeholders. **Response:** *The Office of Child Advocate bill is going through the Office of Judicial Council. DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.* **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.6** The Legislature shall provide funding for additional parent support groups and parent leadership programming focused on developing healthy support

systems for families engaged with the child welfare system at all levels.

**Response:** DCF agrees with this recommendation and we recently issued a grant for the kinship navigator, which will be a support group for parents. **Fiscal Impact:** No fiscal impact, as this currently occurs within DCF resources utilizing a federal grant specifically for state kinship navigator programs.

- **A4.7** The Office of the Child Advocate shall conduct regular multidisciplinary case reviews, especially of complex cases, to assure safety, best interests of children/families and "fresh eyes" in a supportive environment. **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.8** The Office of the Child Advocate shall expand and fund multidisciplinary teams to include a child abuse pediatrician to review reports of abuse of a child under age 4 and shall utilize teleconsultation between the Department for Children and Families investigators and child abuse pediatricians or adequately trained medical professionals to help determine to help assess risk to child and further assess the child's medical needs. **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.9** The Office of the Child Advocate shall review existing multidisciplinary team legislation/statutes and implement funding to reinstate them and shall design annual conference and training for multi-disciplinary teams including those mentioned above so that members better understand their roles. **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.10** The Office of the Child Advocate shall establish a hotline for families locating community-based services and maintain the list of available services as well as have a Family Navigator (or Kinship Navigator) in the office to help connect families to community resources. **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.
- **A4.11** The Office of the Child Advocate in conjunction with the Department for Children and Families shall explore and strengthen partnerships with **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.
- **A6.1** The Office of the Child Advocate shall establish a multidisciplinary review process of a certain number of random cases to discuss case outcomes for quality and cost effectiveness, ensuring DCF is actively involved in cases and

consulted on required benchmarks. **Response:** DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority. **Fiscal Impact:** See A4.1 for fiscal impact.

- A6.2** The legislature shall require a third party, independent audit of the outcomes of the child protection system annually and the auditor shall develop recommendations to DCF based upon data and social work best practices. This shall also include employment data related to the child welfare workforce in Kansas. This data will include, but not be limited to, the tenure of current staff, staff turnover data and data related to effectiveness of enhancements designed to increase retention. The legislature shall review those recommendations and hold DCF and contractors highly accountable to incorporate recommendations and best practices when each contract is re-bid or they must be able to explain why not. **Response:** DCF believes the quality of child welfare services is of the utmost importance. We are in the process of strengthening our internal oversight. Internally, the audits division is evaluating and analyzing all child welfare reports, looking for both positive and negative trends and analysis. Should they find a trend, audits are to meet with PPS to discuss needed action. The Child Welfare system has multiple outcomes, both State and federal, that it must meet. Additionally, our federal partners regularly audit our performance. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$4,500,000	\$4,500,000

\*It should be noted that the fiscal impact only covers the cost of the audit and does not include any remedial costs associated with implementing best practices.

- A6.3** The Legislature shall request the Legislative Post Audit Committee to review the ongoing audits that DCF conducts as well as conduct any additional audits to make recommendations to the Legislature. **Response:** The Kansas Legislature is able to request an audit of DCF at any time through the Legislative Post Audit, and has requested regular audits of the child welfare system over the years. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

## DCF Responses to Working Group B

- B1.1** The Kansas Department for Children and Families shall create a statewide policy and procedure to ensure families have access to resources and mental health services, substance use treatment, Generation Parent Management Training – Oregon (PMTO), support groups, family preservation or consider alternative placements with kinship. **Response:** DCF will be implementing many of these initiatives through Family First Prevention Services Act (FFPSA). DCF is expanding PMTO providers through foster care grants. Currently, this is being

done on a small scale, but PMTO will be statewide with the new child welfare grants. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$7,000,000	\$3,500,000

- **B1.2** The State of Kansas, including the Kansas Department for Aging and Disability Services, shall apply for available funds and work to increase access to mental health, substance abuse and Generation – Parent Management Training – Oregon (PMTO) services across the state.

**Response:** DCF regularly pursues available funding opportunities and regularly partners with others in this pursuit. DCF is expanding PMTO providers through foster care grants. Currently, this is being done on a small scale, but PMTO will be statewide with the new child welfare grants. **Fiscal Impact:** See B1.1 for fiscal impact.

- **B2.1** The Kansas Department for Children and Families shall track families that have multiple calls for different occurrences of abuse or neglect that are reported and require notification of law enforcement when mandatory reporters have made reports on two or more distinct incidents of suspected abuse or neglect. The Kansas Department for Children and Families shall establish a Memorandum of Understanding (MOU) between law enforcement and DCF that guides coordination between the two agencies, and other multidisciplinary team members. The State of Kansas shall ensure that funding is provided for such collaboration. **Response:** Kansas statute mandates when joint investigations are required. PPM 1530: Joint Investigations between DCF and the appropriate law enforcement agency or agencies are mandated by statute (K.S.A. 38-2226(b)) when a report alleges serious physical harm to, serious deterioration of or sexual abuse of the child; and action may be required to protect the child. Without a Comprehensive Child Welfare Information System (CCWIS) this becomes a burden to staff that DCF can't handle with current resources. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$2,000,000	\$1,900,000

- **B2.2** The Kansas Department for Children and Families shall establish and maintain Immediate Response investigators to work in collaboration with law enforcement and courts when warranted. **Response:** DCF conceptually agrees with the working group's recommendation to implement immediate response. As previously mentioned, we have allowed for flex scheduling where possible, which should capture most calls that the KPRC receives. But currently, we do not have the resources to create a 24/7 immediate response investigator to be dispatched when warranted. We implemented an immediate response pilot in Wichita, as of November 1, 2018. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$2,208,000	\$2,120,000

- **B3.1** The Kansas Department for Children and Families shall establish and maintain a list of local law enforcement liaison/emergency contacts. **Response:** *KPRC already maintains a list. Fiscal Impact: No fiscal impact as this currently occurs within resources.*
- **B3.2** The Kansas Department for Children and Families shall implement the structured decision-making (SDM) program. **Response:** *DCF is currently working to implement structured decision-making. On Feb. 8, 2018, DCF signed a contract with the National Council on Crime and Delinquency (NCCD). The IT side of the NCCD team has begun the process of gathering requirements for long and short-term integration. Fiscal Impact: No fiscal impact as this currently occurs within resources*
- **B3.3** The Kansas Department for Children and Families shall collaborate with local law enforcement, mental health, education and community partners for child welfare checks in all communities including rural and frontier communities. **Response:** *Secretary Meier-Hummel and DCF Leadership are working to strengthen partnerships with local law enforcement and other child welfare system stakeholders. Although, the KPRC and regional DCF staff already have protocols in place related to when it is appropriate to contact law enforcement for child welfare checks. The agency cannot compel a local law enforcement to complete a requested check. Fiscal Impact: No fiscal impact as this currently occurs within resources.*
- **B3.4** The Kansas Department for Children and Families shall develop flex work schedules with immediate response investigators who can be on-call for the hotline with secure access to technology to keep costs down. **Response:** *DCF has allowed and encouraged flexible schedule when it meets both staff and agency needs. Personnel Policy K.A.R. 1-5-28, Section No. 6-1, addresses flex time. Flex time is a consistently recurring work schedule that differs from the routinely expected work schedule of a position. Appointing Authorities have the discretion to approve flexible work schedules providing the workday continues to be 8 hours and the workweek continues to be 40 hours. Flexible work schedules that deviate from the standard workday or workweek must be approved by the appropriate Executive Committee member and addressed to DCF Office of Personnel Services. Fiscal Impact: See B2.2 for fiscal impact.*
- **B3.5** The Kansas Department for Children and Families shall have accurate reporting and analysis of effectiveness of outcomes of a 24/7 hotline. **Response:** *The agency tracks a multitude of data as it relates to the KPRC and we are actively looking at ways to strengthen child protective services. Fiscal Impact: No fiscal impact as this currently occurs within resources.*

- B4.1** The State of Kansas shall utilize technology to ensure the entire Serious Injury Review Team can be present for reviews. **Response:** *In regard to the recommendation about the serious injury review, DCF already has a process in place where staff review critical incidents. Outside of our internal reviews of these critical incidents, current law prohibits anything else. Although, the Child Death Review Board, a multidisciplinary team, looks at all child deaths in Kansas. Several things have been instituted after recommendations by the Child Death Review Board, including Safe Sleep, Period of Purple Crying, comprehensive training for DCF staff and injury identification training for DCF staff. Critical Incidents are addressed in PPM 0514. This is a potential violation of the Child Abuse Prevention and Treatment Act, and could jeopardize federal funding.*  
**Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*

- B4.2** The Serious Injury Review team shall be comprised of stakeholders including, but not limited to, law enforcement, prosecutors, educators, social workers, counselors, contractors, medical personnel—preferably with child abuse training—and should include individuals from the county, community and region. **Response:** *In regard to the recommendation about the serious injury review, DCF already has a process in place where staff review critical incidents. Outside of our internal reviews of these critical incidents, current law prohibits anything else. Although, the Child Death Review Board, a multidisciplinary team, looks at all child deaths in Kansas. Several things have been instituted after recommendations by the Child Death Review Board, including Safe Sleep, Period of Purple Crying, comprehensive training for DCF staff and injury identification training for DCF staff. Critical Incidents are addressed in PPM 0514. This is a potential violation of the Child Abuse Prevention and Treatment Act, and could jeopardize federal funding.* **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$150,000	\$150,000

- B5.1** The Kansas Department for Children and Families shall make available routine refresher trainings to improve their critical thinking, investigative skills and child forensic interviewing. **Response:** *We are working to improve skills of current and hired workers. We have specialized training for all staff and are working on ongoing training. DCF currently requires a number of continuing education efforts. DCF also utilizes CJA funds to provide a grant to Child First, which provides training on forensic interviewing. DCF staff, as well as law enforcement, are able to attend this training to learn an evidenced-based training for interviewing children who have potentially been subjected to sexual abuse or assault.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- B5.2** The Kansas Department for Children and Families shall provide specific training to investigative staff on cultural sensitivity, the impact of poverty on families, adverse childhood experiences (ACEs) and the impact of removing a

child from home. **Response:** The PPS Academy, which is now provided to every incoming child protection specialist, contains training on cultural sensitivity. Also, a large portion of PPS staff attend the Governor's Conference every year, which focuses on ACEs. DCF pays for ongoing CEUs for staff. The training that staff attend cover these and many other important topics. Additionally, child welfare staff attend the Philosophy of Care training, which serves as a blueprint, describing the agency's values and how that impacts how DCF works with children and families. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

- **B5.3** The Kansas Department for Children and Families shall train front-end staff with critical thinking skills to assess safety for that family from the beginning of the assessment to effectively determine investigative action. **Response:** DCF, along with the University of Kansas, KVC Kansas, Saint Francis Ministries and the Kansas Court Improvement Program, recently received an \$8 million, five-year grant to create Kansas Strong for Children and Families. Also see response to B5.1. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **B6.1** The Kansas Legislature shall enact a policy for universal screening of risk for all Kansas newborns and a referral system to evidence-based programs for all high-risk newborns before leaving the hospital. **Response:** This recommendation does not fall under our jurisdiction. **Fiscal Impact:** No fiscal impact to DCF.
- **B6.2** The Kansas Department for Children and Families shall develop outcome measures to gauge success of preventative services provided. **Response:** For family service and family preservation grants, DCF develops outcome measures and continuously analyzes them to determine if they require modification. FFPSA will require evidence-based practices and outcome monitoring. Family Preservation grant outcomes use CFPSR measurements including "Children are safely maintained in their homes whenever possible and appropriate" and also include the following additional measures:
  1. Families are engaged timely in program services;
  2. Children are safe from future maltreatment, as defined by a subsequent affirmed or substantiated finding for abuse or neglect;
  3. Children are safely maintained at home, with family;
  4. Babies are born substance free to women using non-opioid substances;
  5. Pregnant women using opioids will be referred for medication assisted treatment. **Fiscal Impact:** See B1.1 for FFPSA fiscal impact. Current prevention service reporting occurs within resources.
- **B6.3** The State of Kansas shall identify and support community partners and services which include naturally occurring resources to better identify and enhance families' protective abilities. The State of Kansas shall fund these services to ensure that they are adequately staffed so that workers may become aware of safety situations before they become acute and communicate such concerns in a timely manner. **Response:** DCF conceptually agrees that more

*work should be done with communities. Although, DCF is working with local communities to launch Vital Impact, a collaborative approach to supporting Kansans, in Shawnee and Sedgwick county. Vital Impact was first launched in Wyandotte county. In five years, they were able to significantly decrease the number of homeless youth in that area. **Fiscal Impact:** See B1.1 for FFPSA fiscal impact.*

- **B6.4** The Kansas Department for Children and Families shall ensure differential responses include a thorough identification and assessment of parental supports including local service groups, multidisciplinary teams and economic supports. **Response:** *DCF is pursuing this through numerous initiatives, including Risk Removal Staffing's, Kansas Strong for Children and Families and Collaborative Service Delivery. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.*
- **B6.5** The State of Kansas shall fund services equally with consideration to the availability and accessibility of services to rural, frontier, isolated and socioeconomically challenged areas. **Response:** *DCF agrees all Kansans should have access to services and resources, regardless of where they are located in the state, but acknowledges there needs to be a funding stream for this. The agency provides family preservation services statewide—referrals are adjusted to meet the needs of each DCF region. Family service funds are available statewide. Family service grants are pursued in every region. **Fiscal Impact:** See B1.1 for FFPSA fiscal impact, as this program will help to support funding of community service.*
- **B7.1** The State of Kansas shall ensure availability and access to community services in rural and urban areas of the state such as, but not limited to, helping with child care, mental health, or transportation. **Response:** *DCF agrees all Kansans should have access to services and resources, regardless of where they are located in the state, but acknowledges there needs to be a funding stream for this. **Fiscal Impact:** Child care assistance currently occurs within resources.*
- **B7.2** The State of Kansas shall strengthen and provide matching financial support for community collaborations, including family resource centers that coordinate, facilitate and offer services that build resilience in families and communities. The State of Kansas shall encourage such funding to improve community resources and safety net areas such as child care. **Response:** *DCF agrees that strong communities lead to strong families. Our ability to implement this recommendation is dependent on financial resources. **Fiscal Impact:** Child care assistance, Home Visitation grants and other childhood programs currently occur within resources.*
- **B7.3** The State of Kansas shall remove barriers to services such as job requirements and longevity limits which tend to punish children for adult disabilities

and challenges. **Response:** When serving Kansans, DCF reviews and looks at each individual case. Should an individual experience a hardship, DCF has the option to make exceptions. **Fiscal Impact:**

	All Funds	State General Funds
Unfunded	\$16,893,000	\$0
<i>TANF impact if 48-month time limit was removed.</i>		

- **B7.4** The State of Kansas shall provide government-funded services to utilize evidence-based best practice standards in determining the extent and length of services provided. **Response:** DCF will utilize FFPSA. **Fiscal Impact:** See B1.1 for FFPSA fiscal impact.
- **B7.5** The State of Kansas and the Legislature shall fund and expand KanCare. **Response:** The Legislature will need to address this issue. **Fiscal Impact:** No fiscal impact to DCF at this time.
- **B7.6** The State of Kansas and the Legislature shall maintain funding and deny cuts to the Kansas Children's Initiative Fund. **Response:** The Legislature will need to address this issue. **Fiscal Impact:** No fiscal impact to DCF at this time. The loss of CIF would result in a 48% reduction in DCF's current Family Preservation program.
- **B7.7** The State of Kansas and Legislature shall lift restrictions on TANF. **Response:** This is an issue the Legislature will need to address. **Fiscal Impact:** See B7.3 for fiscal impact on TANF.
- **B7.8** The Kansas Department for Children and Families shall provide services under a flexible family preservation period. **Response:** DCF has awarded Family Preservation Grants, which contains this recommendation. It will become effective July 1, 2019 in new Family Preservation Grant. The new Family Preservation Grant will offer three tiers of services, tailored to the individual family's needs. The tiers range from intensive, therapeutic services, to case management services and direct services to families through community resources. The intensity of services will be based on the family's needs and length of services can from four weeks to a year of services. **Fiscal Impact:** No fiscal impact as this will occur within resources.

## DCF Responses to Working Group C

- **C1.1** The State of Kansas, including but not limited to the Department for Children and Families and their service providers, will offer behavioral health services in the home or natural setting, and with a care provider who can continue to serve older youth as they transition out of care. **Response:** DCF agrees with this recommendation and we are currently doing this now. PPM 3210 B. 7 Roles related to case planning. Starting in July 2019, youth who age out of foster care will have 6 months of aftercare; the case management grantee will

work in conjunction with the DCF IL coordinator to ensure services and supports are provided. Moving forward with FFPSA, this will start earlier at the age of 14. **Fiscal Impact:** See B1.1 for FFPSA fiscal impact.

- **C1.2** The State of Kansas shall coordinate an automatic enrollment process for the Medicaid state plan for young adults under age 26 years. **Response:** DCF will pass this recommendation along to our sister agencies. **Fiscal Impact:** No fiscal impact to DCF.
- **C1.3** The State of Kansas, including but not limited to the Department for Children and Families and their service providers, shall provide behavioral health services via telemedicine technology so young adults under age 26 can continue receiving services from the same provider even if they move to various locations in the state. **Response:** DCF will pass this recommendation along to our sister agencies. **Fiscal Impact:** No fiscal impact to DCF.
- **C1.4** The Kansas Department for Children and Families shall implement more transitional and independent living programs that will empower young adults age 18-21 with gradual steps of independence so that they will consider remaining in care beyond age 18. **Response:** DCF offers a robust Independent Living program. Youth in Kansas are legal adults at the age of 18. While the agency encourages youth to take full advantage of the IL program, including remaining in care after age 18, they are free to make their own choices about remaining in care. We will continue to evaluate our IL program to look for ways to strengthen our services to youth aging out of foster care. However, moving forward, one of our goals is to strengthen this program. Please visit PPM 7000, 7040, 7200, 7213 to see answer reflected in policy. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C1.5** The State of Kansas shall ensure youth are fully informed of available education, job training and career exploration opportunities prior to aging out of care, such as the Kansas Department for Children and Families establishing partnerships with industries and organizations that have workforce development training programs for skilled trades and other careers that could provide job opportunities. **Response:** Independent Living coordinators begin attending youth case plans at age 16 to inform youth of said opportunities. Please visit PPM 3210 B. 7 for Roles related to case planning. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C2.1** The State of Kansas shall provide intensive, in-home, one-on-one services, following the Behavioral Interventionist Program™ (BI) or similar model, statewide to children who struggle with behavioral and emotional management to the degree that the behaviors threaten the stability of their current placement, to reduce hospitalization and/or congregate care and maintain their current placement. **Response:** DCF appreciates this recommendation and has explored possible interventions. For example, Parent Management Training Oregon

(PMTO) and Trust-Based Relational Intervention (TBRI) are already being utilized in Kansas. Below are descriptions of each model: Parent Management Training Oregon (PMTO) interventions have been tailored for specific clinical problems, such as antisocial behavior, conduct problems, theft, delinquency, substance abuse, and child neglect and abuse. The target population is parents of children 2-18 years of age with disruptive behaviors such as conduct disorder, oppositional defiant disorder, and anti-social behaviors.

Trust-Based Relational Intervention (TBRI) is an evidenced based practice for parents parenting children who have experienced trauma. This service is delivered through the Kansas Post Adoption Resource Center. This service will be expanded as more therapists are trained in this intervention. **Fiscal Impact:** No fiscal impact can be determined at this time.

- **C2.2** The State of Kansas shall expand and ensure availability and access to comprehensive mental health services in schools involving genuine collaboration and mutual support among school and community providers. **Response:** *This is an issue that the Kansas legislature will need to address.* **Fiscal Impact:** *No fiscal impact can be determined at this time.*
- **C2.3** The State of Kansas shall expand and ensure availability and access to home-based family therapy services in communities statewide and ensure adequate reimbursement to providers for time, travel and other related expenses. **Response:** *This is an issue the Kansas legislature will need to address.* **Fiscal Impact:** *No fiscal impact can be determined at this time.*
- **C2.4** The State of Kansas shall fund alternate provider contracts that promote the development and maintenance of promising practices to serve high-needs foster care youth. **Response:** *DCF appreciates this recommendation and is exploring other provider contracts.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **C2.5** The State of Kansas shall provide comparable services in all areas of the state—including rural and frontier parts of the state—addressing language barriers and cultural competency. **Response:** *DCF attempts to meet this recommendation through bilingual staff, live interpretation and language line interpretation services. Please see answer reflected in policy: PPM 0221 When working with individuals who are limited in their ability to communicate in English, reasonable steps shall be taken to ensure meaningful communication. This will normally include provision of an interpreter or providing written documents in their language, if available.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **C3.1** The Medicaid state plan shall recognize for reimbursement the use of Diagnostic Classifications of Mental Health and Developmental Disorders (DC: 0-5) for diagnosis and treatment of children age 0-5 years. **Response:** *DCF will pass this recommendation along to our sister agencies.* **Fiscal Impact:** *No fiscal*

impact to DCF.

- **C3.2** The State of Kansas will use a trauma-informed assessment to identify at-risk children age 5 and under and their caregivers who will receive supportive services through a system of care accessible statewide. **Response:** DCF is implementing this recommendation through the Kansas Assessment and Permanency Project (KAPP). Please see below trauma assessments:  
The Grantee shall conduct the following trauma screenings on the child and family:
  - A. Structured Decision Making (SDM); 24-Hour Safety Assessment for child protection (if not previously completed)
  - B. Child Stress Disorder checklist-KS (CSDC-KS) Ages 0-18; Screening for child's history of trauma and current symptoms
  - C. Child Report of Post-Traumatic Symptoms (CROPS) Ages 6-18; Screening for child's history of trauma and current symptoms
  - D. Ages and Stages Questionnaire – Social Emotional (ASQ-SE) Ages 0-2; Screening for social-emotional functioning
  - E. Preschool and Early Childhood Functional Assessment Scale (PECFAS) Ages 3-5; Assesses behavioral health functioning
  - F. Parenting Stress Index – Short Form (PSI-SF) Ages 0-18; Assesses parenting stress**Fiscal Impact:** No fiscal impact as this currently funded through a grant with KU. After the expiration of the grant this will be included in the Foster Care Case Management grants.
- **C3.3** The State of Kansas shall ensure identified at-risk children and their caregivers are screened and assessed at regular intervals in early childhood programs. Based on the screening results, work in collaboration with partners to address Adverse Childhood Experiences (ACEs) and sources of toxic stress. **Response:** This recommendation does not fall under our jurisdiction, and as such, the agency has no response. **Fiscal Impact:** No fiscal impact to DCF.
- **C4:** Court Appointed Special Advocates. The Legislature shall fund Court Appointed Special Advocates (CASA) to ensure the availability of CASA volunteers in all jurisdictions. **Response:** This is an issue that the Kansas Legislature will need to address. **Fiscal Impact:** No fiscal impact to DCF.
- **C5.1** The Legislature shall fund and implement Generation Parent Management Training — Oregon Model (PMTO) for all cases, and Medicaid reimbursement shall be provided for current procedural terminology (CPT) code 90846. **Response:** DCF is currently utilizing PMTO, and we will pass along the recommendation to our sister agencies. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C5.2** The state shall establish a parent partner program to provide support to parents whose children are in foster care. **Response:** The agency currently has

a contract that is in the process of being awarded that will satisfy this recommendation. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

- **C5.3** The Kansas Department for Children and Families shall implement programs to enhance co-parenting between parents and foster parents. **Response:** The agency currently has implemented Ice Breakers, which will satisfy this recommendation. Below is language about Ice Breakers from the Case Management RFP: Utilize Icebreaker meetings, per policy, between parents/caregivers and foster parents to promote easier adjustments for children and parents involved in the child welfare system. Discussions are child-focused and typically involve parents/caregivers sharing information about the child with foster parents, and foster parents sharing information about the foster home with parents/caregivers. Through these interactions, parents/caregivers and foster parents can form relationships of mutual respect, tempering the often-painful experience of out-of-home placement for children and families. Contacts between parents/caregivers and foster families are individualized to each family and opportunities may exist allowing each family to support and teach each other. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C6.1** The Kansas Department for Children and Families shall assign a third-party facilitator who is not an employee of DCF or a contracted child-placing agency, and who is experienced with the child welfare system and has had training in meditation or facilitation. **Response:** Case plans already require a third party. This recommendation is duplicative. Please see PPM 3207. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C6.2** The third-party facilitator with a liaison from the Kansas Department for Children and Families shall review the case and determine necessary attendees who must be invited to each meeting and who should receive reimbursement for attendance. **Response:** Please see response to 6.1. Please see PPM 3207. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C7.1** The Kansas Department for Children and Families shall develop a placement system to ensure children remain within the child's community upon entering the child welfare system. **Response:** This recommendation will be met by the upcoming Placement Matching System, effective July 1, 2019. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C7.2** The Kansas Department for Children and Families shall provide visitations in evenings and weekends as appropriate, based on age and location of children and their parents' work schedules. **Response:** DCF agrees with this recommendation and it is reflected in the upcoming Case Management grants, effective July 1, 2019. Below is language from the RFP about visitations: The grantee shall ensure children and their families are able to have naturally occurring interactions weekly. These interactions shall primarily occur in the

family's home; however, they could have visits in a variety of other natural settings where meaningful interactions can occur, such as shopping visits, at the park, other family activities, etc. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

- **C7.3** When a child cannot remain in their community, the Kansas Department for Children and Families shall provide transportation to parents for visits, if deemed in the child's best interest. **Response:** DCF agrees with this recommendation and it is reflected in the upcoming Case Management grants, effective July 1, 2019. The case planning process must be timely, individualized and relevant to the family. The Grantee will provide transportation services to parents/caregivers for case plan appointments as needed when the case plan goal is reintegration. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C7.4** The Kansas Department for Children and Families shall provide daily parental visits when infants are removed to promote healthy attachment and other benefits. **Response:** The agency recognizes the importance of infant bonding and the role frequent visitations plays in establishing that bond. The agency agrees that frequent, possibly daily, visitation may be required, dependent on the reason for removal and the current situation/progress of the parents. Family visits is addressed in PPM 3237. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C7.5** The Kansas Department for Children and Families shall provide transportation to services for parents as required by the case plan. **Response:** DCF agrees with this recommendation and it is reflected in the upcoming Case Management grants, effective July 1, 2019. The case planning process must be timely, individualized and relevant to the family. The Grantee will provide transportation services to parents/caregivers for case plan appointments as needed when the case plan goal is reintegration. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C7.6** The Kansas Department for Children and Families shall review and revise existing policy, considering each child's physical, mental and emotional well-being, to allow sibling splits, accommodate sibling sets together, or placements in proximate location, when appropriate. **Response:** DCF is reviewing current policies, specifically PPM 5237. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.
- **C8.1** Child placing agencies shall establish supplemental and ongoing training modules for foster families who choose to offer additional support for older youth, high-needs children and birth families. **Response:** The agency agrees with this recommendation. **Fiscal Impact:** No fiscal impact can be determined at this time.

- **C8.2** Child placing agencies shall tailor licensing requirements for foster families who complete specialized training. **Response:** *To maintain consistency for all foster families across the state, licensing requirements should be implemented by DCF Foster Care and Residential Facility Licensing and the Office of Background Investigations following State regulation, with input from all CPAs.* **Fiscal Impact:** *No fiscal impact can be determined at this time.*
- **C8.3** The Kansas Department for Children and Families shall set higher payment rates for foster families who complete supplemental training. **Response:** *The agency is in the process of setting standard rates for all foster parents. There will be tiers based upon specific child needs.* **Fiscal Impact:** *Fiscal impact for this change will be determined through the consensus caseload process. Final fiscal impact has not yet been determined.*
- **C8.4** The State of Kansas shall employ the use of individualized recruitment programs to do family finding for every youth in foster care. **Response:** *The agency agrees with the recommendation of individualized recruitment programs, when appropriate. Please see PPM 5234 and Appendix 3N.* **Fiscal Impact:** *No fiscal impact as Diligent Recruitment activities currently occur within resources.*
- **C8.5** The Kansas Department for Children and Families shall maintain or increase reimbursement to foster parents following behavior stabilization. **Response:** *The agency is in the process of setting standard rates for all foster parents. There will be tiers based upon specific child needs.* **Fiscal Impact:** *Fiscal impact for this change will be determined through the consensus caseload process.*
- **C8.6** Child placing agencies shall, when appropriate, encourage training opportunities for foster parents seeking to partner with biological parents by engaging foster parents in assisting with visitation supervision, serving as trainers for parents, and assisting with any services that the court is requiring toward reunification. Foster parents who serve in this role shall be paid at the level that a comparable service provider would earn for time spent and for the professional service being offered. **Response:** *The agency currently has implemented Ice Breakers, which will satisfy this recommendation. Meeting times should be set at a time convenient for both biological and foster parents. The Ice Breakers requirement was taken into account during foster parent rate setting.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **C9.1** The State of Kansas shall fund and institute the Families First Prevention Services Act (FFPSA; 2018) in Kansas and follow the federal guidelines. **Response:** *DCF agrees with this recommendation and believes it will result in lower numbers of out of home care.* **Fiscal Impact:** *See B1.1 for FFPSA fiscal impact.*

- **C10.1** If the State of Kansas chooses to award grants or contracts, awards shall be based primarily upon qualifications including, but not limited to, quality of services and shall not be awarded solely based upon financial factors.  
**Response:** *The agency agrees with this recommendation and is currently awarding the new child welfare grants in this manner. Fiscal Impact: No fiscal impact as this currently occurs within resources.*
- **C10.2** The working group supports the recommendation set forth by WGA under the goal of improving workforce morale and tenure — Recommendation A1 and strategies supporting the recommendation A1.1 – A1.5 (page 11). **Response:** *Please see our responses to A1.1—A1.5. Fiscal Impact: See A1.1 for fiscal impact.*
- **C10.3** The State of Kansas, the Department for Children and Families and its service providers shall have a minimum level of technology available to improve efficiencies by July 2019, such as, but not limited to, digitally uploading documentation. **Response:** *DCF currently uploads digitized documentation. Fiscal Impact: No fiscal impact as this currently occurs within resources.*
- **C11.1** The Department for Children and Families shall streamline the requirements for adoption and foster home studies. Then, when possible, determinations should be made to establish consistency between the studies, bearing in mind emerging national standards (e.g., Structured Analysis Family Evaluation [SAFE] model). **Response:** *DCF is reviewing adoption policies to look for efficiencies to finalizing adoptions, specifically PPM 5300. Fiscal Impact: No fiscal impact as this currently occurs within resources*
- **C11.2** As soon as is feasible, after a child comes into care, the Department for Children and Families (DCF) shall ensure receipt of all relevant, basic information including, but not limited to, birth certificate, social security card and social security disability benefits (SSDI and SSI). This information should be made easily available to relevant agency staff in the case that a child's permanency goal changes from reintegration to adoption. Additionally, DCF shall ensure that a timely determination is made as to whether an application for social security benefits should be made on behalf of the child. **Response:** *This recommendation is reflected in current policy, PPM 5030. Fiscal Impact: No fiscal impact as this currently occurs within resources.*
- **C11.3** The Department for Children and Families' policy requiring which documents must be included in adoption finalization packet shall be reconciled with the requirements of the probate code related to private adoptions to support timely permanency through adoption for those in the child welfare system. **Response:** *DCF is currently working to streamline the adoption process. We will be reviewing all adoption processes and statutes, specifically PPM 5339, 5340, 5341 and 5363. We do not oppose this recommendation, but would like to take some time to review. Fiscal Impact: No fiscal impact as this currently occurs*

within resources.

- **C11.4** The Department for Children and Families shall develop a program to diligently search for a foster child's relatives and kin for potential placement options and supports, finding at least 80 relatives within the first 30 days of the child entering state custody and identifying one kinship placement and at least one backup. **Response:** *DCF actively and aggressively looks for kinship placements, per policy PPM 2125, 5230 and 5234. Additionally, DCF was just given a federal grant to develop a robust kinship navigator program.* **Fiscal Impact:** *No fiscal impact as this currently occurs within resources.*
- **C12.1** The Legislature shall modify the Kansas code for care of children to allow for the creation of a legally binding agreement, subject to judicial review, of the child's ongoing best interest providing for post-adoption contacts between siblings, parents, other relatives and persons with whom the child has close emotional ties. **Response:** *The Legislature will need to address this issue.* **Fiscal Impact:** *No fiscal impact to be determined at this time.*
- **C12.2** The Legislature shall review opportunities to modify the Kansas code for care of children (**K.S.A. 38-2270**) to remove preference given to a relative over a person with whom the child has close emotional ties in decisions about adoption absent the showing of extraordinary circumstances. A statute similar to the state of Missouri **Ann. Stat. §§ 453.072; 453.070** shall be considered. **Response:** *DCF opposes equating non-relatives with relatives for permanency considerations because it is contrary to federal statutory placement language and child welfare best practice. DCF recognizes several factors should be considered in a child's permanency, including close emotional ties. However, circumstances exist when ready and willing relatives are unable to immediately accept placement but wish to serve as a permanent placement if the child becomes available.* **Fiscal Impact:** *No fiscal impact to be determined at this time.*
- **C12.3** The Legislature shall modify the Kansas code for care of children to allow the court to conduct an evidentiary hearing to select the most appropriate adoptive resource in the best interest of the child when a party exhausts all administrative remedies after a disputed best interest staffing decision. **Response:** *The Legislature will need to address this issue.* **Fiscal Impact:** *No fiscal impact to be determined at this time.*
- **C12.4** The Kansas Legislature shall revise the Kansas code for care of children to allow the court to review and approve sibling split placements for the purposes of permanency. **Response:** *The Legislature will need to address this issue.* **Fiscal Impact:** *No fiscal impact to be determined at this time.*
- **C13.1** The Department for Children and Families shall consider revising their policy and procedure manual regarding the definition of special needs eligibility for adoption in order to be more inclusive and aligned with other states and

national trends (i.e., lower the age eligibility to national norms of age 5-8; lower the number of siblings from three to two for placement in adoption together; among others). **Response:** DCF is currently reviewing all adoption policies and will take this recommendation into consideration as part of that review. Specifically, DCF is reviewing PPM 6210. **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

- **C13.2** The State of Kansas and Legislature shall consider including children legally free for adoption in the *Human Services Consensus Caseload Estimates*. **Response:** The agency agrees with this recommendation. **Fiscal Impact:** No fiscal impact to DCF.
- **C13.3** The Department for Children and Families shall provide post-adoption support services per guidance from the North American Council on Adoptable Children (NACAC). **Response:** DCF currently provides post-adoption services, through Kansas Post Adoption Resource Center (KPARC), which is administered by the Kansas Children's Service League. To learn more about KPARC, visit <https://www.adoptkiskids.org/for-families/k-parc/> **Fiscal Impact:** No fiscal impact as this currently occurs within resources.

**Appendix:** For all Prevention and Protection Services (PPS) policy references, please visit <http://content.dcf.ks.gov/PPS/robohelp/PPMGenerate/0>