

SFY

**Administrative Review Division
Annual Report**

2002-2003

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Executive Summary

In State Fiscal Year 2002 – 2003 the Administrative Review Division conducted 12,652 reviews. This constituted a 3.1% increase in Child Welfare Administrative Reviews and a 41% decline in Department of Youth Corrections reviews. In addition, in January of 2003 the Administrative Review Division was able to reinstitute the Quality Assurance Process for in-home and short-term placement cases and, during the remainder of the state fiscal year, conducted a total of 851 Quality Assurance Reviews in 21 different counties. The Administrative Review Division was able to conduct this higher number of reviews, and restart the Quality Assurance Review process despite the fact that the budget for SFY 2002 – 2003 was reduced by \$223,745 and there was a reduction of 2 full time employees (FTE). Chart 32 in Appendix A provides information regarding the total number of reviews conducted and FTE by SFY over the history of the Administrative Review Division.

This year's annual report marks a slight departure from past reports in that, rather than simply providing compliance numbers, it highlights and discusses selected areas in more depth. Out of these areas, below is a list of those items where, statewide performance was high, and other areas where improvements may be made.

Child Welfare

Areas of Strong Performance

- Monthly face-to-face contact with children was occurring in the majority of cases
- Involvement of the child in case planning
- Changes in placement were either not occurring, or were related to achieving the permanency goal in the vast majority of cases. For example, during any particular quarter, approximately 63% of the children reviewed did not experience a change in placement, and anywhere from 23% to 30% of the remaining children had a placement change related to achieving their permanency goal.

Areas for Further Improvement

- The involvement of father's in case planning was found to be low (70% for the 3rd Quarter and 76% for the 4th)
- In cases where it would be appropriate to find the father's signature on the Family Service Plan, signatures were present in a relatively low percentage of the cases (3rd quarter, 76%; 4th quarter 81%)
- The frequency of visitation was thought to be adequate to meet the needs of the achieving the permanency goal in approximately 84% of the cases
- Review attendance was low. For example, children were in attendance in only 30% of the reviews where their presence would be appropriate. Also, fathers were present only 28% to 35% of the time
- Previous review findings were addressed by the counties in only 78% of the reviews

Department of Youth Corrections

Areas of Strong Performance

- Contacts with youth were at a 97% compliance rate
- Youth were involved in case planning in 100% of the cases. Similarly, 90% of the mothers and anywhere from 83% to 90% (depending on the quarter) of fathers were involved in case planning
- Signatures of the parents and youth were present in 90% to 100% of the cases when appropriate

Areas for Further Improvement

- In general, attendance of family members at reviews was low. For example, 15% to 29% of mothers were present and only 9% to 23% of fathers were present. In addition, youth were only present in 50% of the reviews.
- Placement changes that were not directly related to achieving the permanency goal occurred in 22% to 30% of cases where moves occurred.

Section One: Overview

Mission Statement

The Administrative Review Division's mission is to promote safety, permanency, and wellbeing for Colorado's children.

Responsibility

Colorado's Administrative Review Division (ARD) is responsible for conducting administrative reviews/foster care reviews and implementing Colorado's identifiable quality assurance program as outlined in the Child and Family Services Plan.

Values and Guiding Principles

- Children need to be raised in their own families whenever safe and possible
- Better outcomes are achieved when parents are actively involved in decision making about their child's needs and future
- Children in out-of-home care should achieve developmentally appropriate benchmarks in their physical, psychological, interpersonal, and educational growth
- Services that actively engage families and build on family strengths achieve more successful outcomes
- Stable, consistent care for children is essential to healthy development and successful reunification or other permanent living arrangements
- Culturally responsive and respectful services and reviews that engage families and providers achieve positive results for children in foster care
- Children are more likely to achieve healthy adulthood if raised in the least restrictive, most family-like environment that is appropriate to their needs

Program Description

The Administrative Review Division is responsible for the federally required Case Review and Quality Assurance Systems for both the Division of Child Welfare and the Division of Youth Corrections in Colorado. As Administrative Review Division staff is geographically based, the Division is able to provide a Case Review and Quality Assurance system in each jurisdiction in the state. The Administrative Review Process involves an on-site case review and face-to-face meeting for all children who are in out-of-home placement for at least six months and is held every six months, as long as the child/youth remains in out-of-home placement. The Quality Assurance Review system includes the review of a random sampling of child welfare cases that are receiving in-home and short-term placement services. A primary purpose of both types of reviews is to monitor the federally prescribed outcomes of safety, permanence, and child and family wellbeing for children and families receiving services through the Child Welfare or Division of Youth Corrections programs. Both reviews have incorporated many of the requirements addressed in Colorado's federally mandated Performance Improvement Plan. Written findings and case specific data reports are provided daily for each completed Administrative Review.

In addition to the case specific data and reports, data is collected, analyzed, and reported in an aggregate form from all of the Administrative Review Division reviews and processes. The data and/or reports are provided to both state and county program staff for their use in developing and implementing policy and practice changes, with the goal of improving the outcomes of safety, permanency, and wellbeing for children and families. All external and internal data reports are placed on the Division website (www.cdhs.state.co.us/OPI/ARD/ARD.html) for view and use.

Budget

The Administrative Review Division's budget for State Fiscal Year (SFY) 2002 – 2003 was approved at \$2,148,702 and 29.0 FTE. This reflected a reduction in the budget and staff from the SFY 2001 – 2002 of \$223,745 and 2 FTE.

Program Highlights

During the State Fiscal Year (SFY) 2002 – 2003, several notable events occurred that were worthy of brief mention.

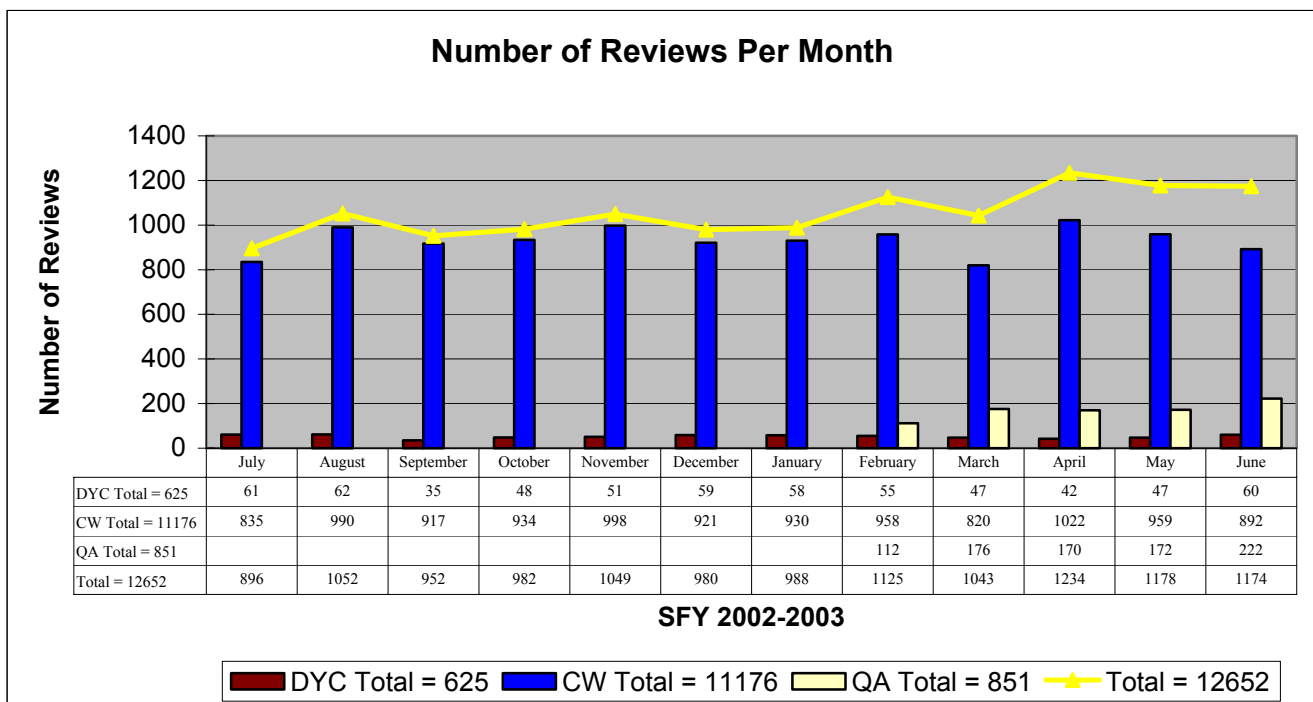
- On September 11th, 2002, the state of Colorado received the final report from the Child and Family Services Review. In the report, the Quality Assurance System was found to be an area in substantial conformity. The Case Review System, however, was found to be an area not in substantial conformity. This was primarily due to the state's inability to enforce compliance, and the substitution by the Administrative Review Division of court processes in the Department of Youth Corrections. While the Colorado Department of Human Services had submitted a waiver requesting that the Administrative Review Division be allowed to substitute, the waiver request was denied. In making this decision, the Federal Office determined that the Administrative Review Division was under the same supervisory structure as Child Welfare and therefore could not substitute for the courts in conducting Permanency Hearings.
- As a result of the Child and Family Services Review, the Administrative Review Division partnered with the Division of Child Welfare to draft the State of Colorado's Program Improvement Plan that outlined how the state would address the deficiencies identified in the report. At a meeting in October of 2002 with Federal Representatives from both Region 8 and Washington, D.C., the Administrative Review Division was asked to monitor state performance in maintaining compliance with areas where the state was found in substantial conformity, as well as efforts to improve in those areas where the State was found not in substantial conformity. As a result, one of the primary sources of data for measuring successful achievement of the Program Improvement Plan is the Administrative Review Division.
- During a Child Welfare Advisory Group meeting with both State and County stakeholders, the Administrative Review Division received recognition from Peter Watson of the National Resource Center on Organizational Improvement in Child Welfare for being the best in the nation in two areas, and on the leading edge of a third.
 1. Colorado is the only state that has combined the Quality Assurance Reviews with the Administrative Reviews, which has created an efficient and effective method of managing resources. The rest of the states utilize separate processes for each of these systems.
 2. Colorado is the only state supervised, county administered system that has a Quality Assurance process through all jurisdictions of the state.
 3. Colorado is one of the few states that had solid baseline data for the creation of their Program Improvement Plan due to the work of the Administrative Review Division.
- The Administrative Review Division restructured the final reports from the Quality Assurance Reviews to make them more easily interpretable and more useful to stakeholders. Included with the data is a narrative section exploring the strengths and barriers within the county for the areas reviewed. Overall, counties responded very positively to the redesigned reporting format.
- The status of conducting Quality Assurance Reviews was again being reported to both the State Auditor's Office and the Federal Region 8 Office. Through these reviews, and the reports discussed above, the Administrative Review Division uncovered many issues and problems with data entry into the State's SACWIS system (Colorado Trails), intake processes, and program deficiencies. The Administrative Review Division also identified numerous strengths among and between the various counties. Through this process, the Administrative Review Division was also able to begin to partner with county department quality assurance units and staffs.
- As part of the workload reduction effort and increased scrutiny by County Directors due to budget reductions, the Administrative Review Division offered to work with any county and their court to determine if the court in their jurisdiction could meet the requirements for the six-month periodic reviews, the case review, and the

quality assurance review functions. However, throughout the end of the SFY for which this report covers, no county requested such assistance or expressed an interest in assuming those functions.

Reviews Completed for SFY 2002 – 2003

In State Fiscal Year (SFY) 2002 – 2003, the Administrative Review Division conducted a total of 12,652 reviews, a 6.3% increase overall from SFY 2001 - 2002. This total included 11,176 Administrative Reviews conducted in Child Welfare (a 3.1% increase from SFY 2001 – 2002), 625 Administrative Reviews held in the Department of Youth Corrections (a 41% decline from SFY 2001 – 2002) and 851 Quality Assurance Reviews on Child Welfare cases. Although the number of DYC reviews dropped sharply, which may be attributed to the opening of Ridgeview (a 500 bed treatment program), it should be noted that ARD was able to reinstitute the Quality Assurance Reviews which had not been held during the previous year, leading to the overall increase in the total number of reviews conducted. In addition, as the Quality Assurance Reviews were only conducted for the last 5 months of SFY 2002 – 2003 it is anticipated that these numbers will grow even more for the following year. The review numbers for SFY 2002 – 2003 are displayed below in Chart 1. For more information on the review numbers for prior years, please refer to the charts in Appendix A.

Chart 1: Review Numbers for SFY 2002 – 2003



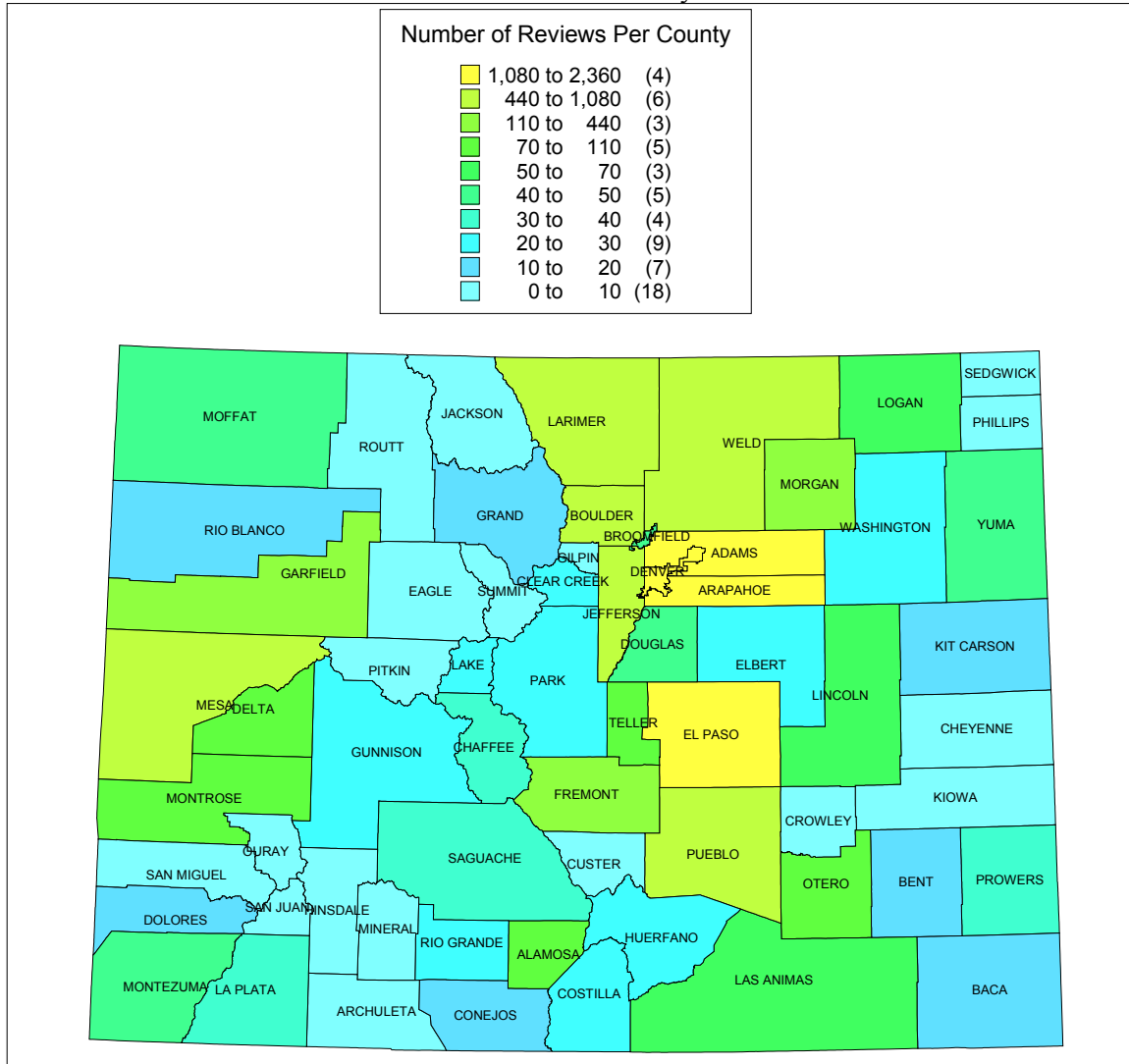
Child Welfare Administrative Reviews

As denoted in Map 1 (seen on page 4), the vast majority of Child Welfare Administrative Reviews were held in a relatively small number of counties. Specifically, the four largest counties (Adams, Arapahoe, Denver, and El Paso) accounted for almost 52% of all the Child Welfare Administrative Reviews conducted. When this list is expanded to the ten largest counties (adding Boulder, Larimer, Pueblo, Mesa, Weld, and Jefferson) the percentage increases to almost 85%. The exact number of Administrative Reviews conducted in the counties is displayed in Appendix B.

As a result of these reviews, a total of 61 cases were submitted for a possible fiscal recovery or fiscal sanction. This represents a dramatic reduction from all prior years and was largely due to the Administrative Review Division

discontinuing IV-E sanctions, as the Child Welfare Program staff had acquired IV-E contract staff to conduct their own reviews.

Map 1: Number of Child Welfare Administrative Reviews Per County



Department of Youth Corrections Reviews

In total, 625 Administrative Reviews were conducted in the Department of Youth Corrections. Table 1 shows the number of Administrative Reviews held in each DYC Region by type as well as the total for each region.

	In Home	Community Placement	Total
Northern	64	114	178
Western	48	70	118
Southern	42	74	116
Denver	8	100	108
Central	30	75	105
Total	192	433	625

Quality Assurance Reviews

The Administrative Review Division had historically conducted Quality Assurance Reviews since 1991. However, when the state moved from the CWEST data system to the Trails State Automated Child Welfare Information System (SACWIS) in 2001 there were initial problems with the system that would not allow the Administrative Review Division to conduct the random sample needed to identify children for review in the counties. Therefore, the Quality Assurance Reviews were temporarily suspended until the initial problems with the extract from Trails were identified and corrected. In 2002, the State Auditors noted that the Administrative Review Division needed to reinstitute the Quality Assurance Reviews. As of January 2003, the Trails system was able to reliably generate a list of children with open services from which the Administrative Review Division could then identify and randomly select the sub-populations desired for the Quality Assurance Reviews. The Quality Assurance Reviews were reinstated in February of 2003 and continued on a pilot basis through June 30th, 2003, at which time the pilot phase was ended. This pilot phase allowed ARD to refine the QA sampling process and review instrument and provided counties time to provide ARD with feedback regarding the process. In total, then, 851 QA Reviews were held in the following 21 counties:

Adams	El Paso	Moffat
Arapahoe	Fremont	Montezuma
Boulder	Grand/Jackson	Morgan
Broomfield	Jefferson	Pueblo
Denver	La Plata	Rio Grande
Douglas	Larimer	Weld
Eagle	Mesa	Yuma

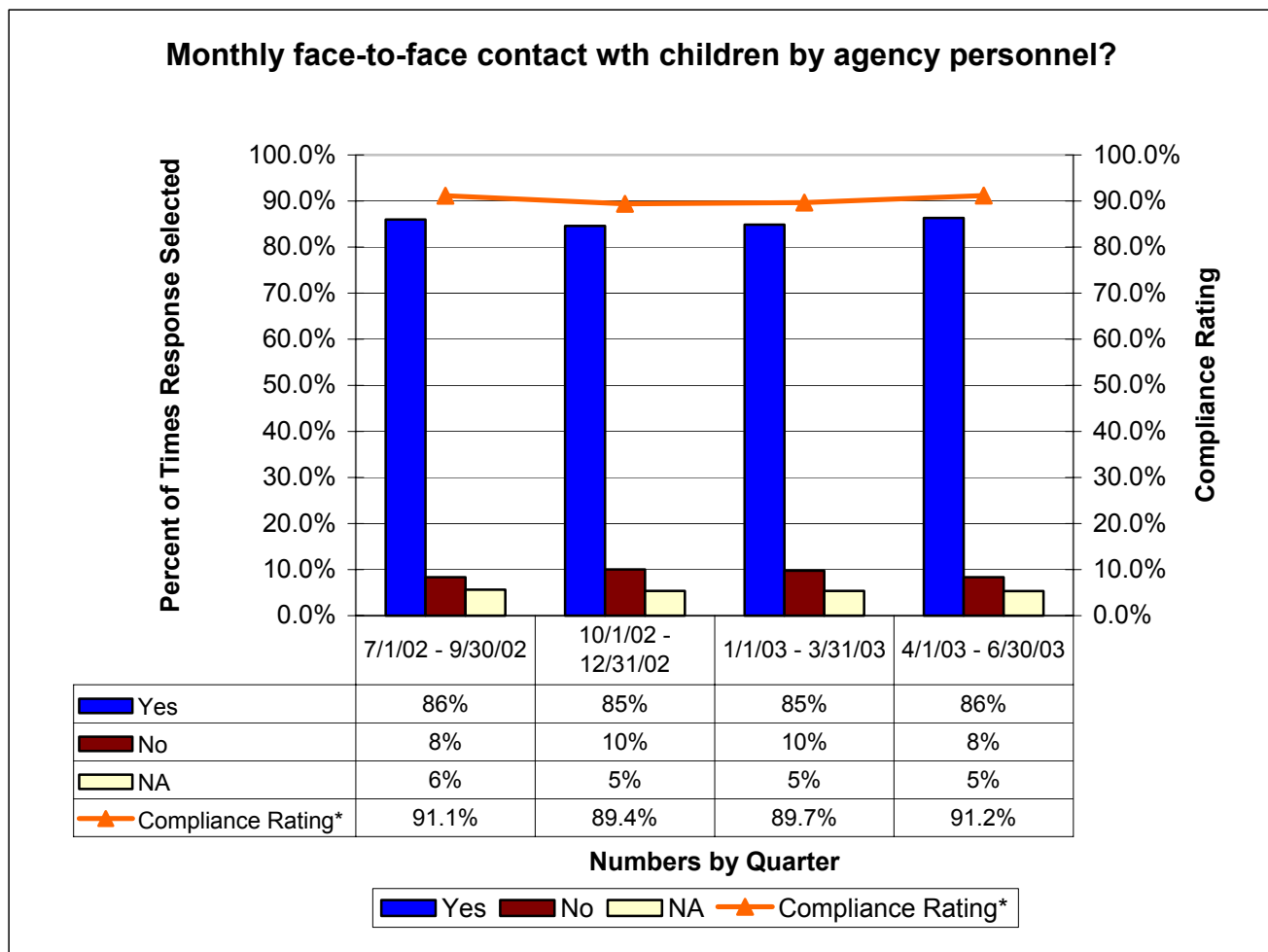
Section Two: Child Welfare Administrative Review Data Analyses

While past Administrative Review Division Annual Reports have displayed the results for all of the questions, this year’s report marks somewhat of a departure from that approach. It was thought that it might prove more beneficial to also select a few key areas to analyze at a closer level in order to determine how well the State of Colorado is doing in promoting the Safety, Permanency, and Well-Being of children in their care. As such, the following sections were identified as areas within Child Welfare that would be important to highlight in this years report.

Monthly Face-to-Face Contact with Children by Agency Personnel

As continued and frequent contact is one of the most important ways that a county Department of Human/Social Services can ensure the Safety and Well-Being of children in their care, the Administrative Review Division monitors the county’s ability to maintain contact with children. Specifically, the Administrative Review Division monitors this through the question, “Is there a minimum of monthly face-to-face contact by agency personnel with the child after the first month, or are exceptions documented?” As noted in Chart 2 below, overall performance on

Chart 2: Monthly face-to-face contact with youth



* Compliance Rating is calculated as $Y/(Y+N)$

this question was relatively high. Not counting the cases where this question was Not Applicable (NA), compliance across all four quarters ranged from a low of 89.4% (second quarter) to a high of 91.2% (fourth quarter). Overall then,

it appeared that for SFY 2002 – 2003, children across the state were being contacted by county personnel at a high, and relatively stable, rate.

Involvement in Case Planning

Another important aspect of promoting Permanency and Well-Being is involving the family in case planning. As such, involvement of the family is required at several different levels shown below:

Colorado Children’s Code

19-3-209. Individual Case Plan – required. An individual case plan, developed with the input or participation of the family, is required to be in place for all abused and neglected children and the families of such children in each case which is opened for the provision of services beyond the investigation of the report of child abuse or neglect, regardless of whether the child or children involved are placed out of the home or under court supervision.

Volume VII

7.200.1 Child Welfare Services

Child Welfare services constitutes a specialized set of services that are intended to strengthen the ability of families to protect and care for their own children, minimize harm to children and youth, and ensure permanency planning. The goal shall be to support the intactness of families, when appropriate, through the provision of services aimed at stabilizing the family situation and strengthening the parents/guardians in fulfilling their parental responsibilities to their children. Intervention shall be guided by respect for the family’s integrity, knowledge of the legal base for action, and sound social work practice.

The following principles shall underlie the provision of Child Welfare Services:

F. Case planning shall involve the parents so that relevant services can be provided to permit timely rehabilitation and reunification.

7.301.1 Assessment

The Colorado Assessment Continuum (CAC) will be utilized through the case. The CAC includes:

- Safety assessment and plan
- Risk assessment
- Risk re-assessment
- Needs assessment

Safety, risk and needs assessments, as defined in this manual, shall be completed for each case accepted by the county department and shall be the basis for case planning.

A. The family shall be involved in all phases of assessment and case planning.

7.301.22 Family Service Plan Participants

The county shall assure that the following parties participate in the development of the Family Services Plan:

- Caseworker
- Parent(s) or legal guardian(s)
- Child
- Immediate and extended family members as appropriate to the family and child’s service needs
- Service providers, including kin caregivers and other out of home caregivers

All parties shall sign the plan and the caseworker's supervisor shall approve and sign the plan. The caseworker shall provide all parties with a copy of the signed plan. The reasons for any absence of signatures shall be documented on the plan. If the caseworker is unable to involve both parents, child, or provider, the efforts to do so and the reasons for the inability to do so shall be documented on the plan.

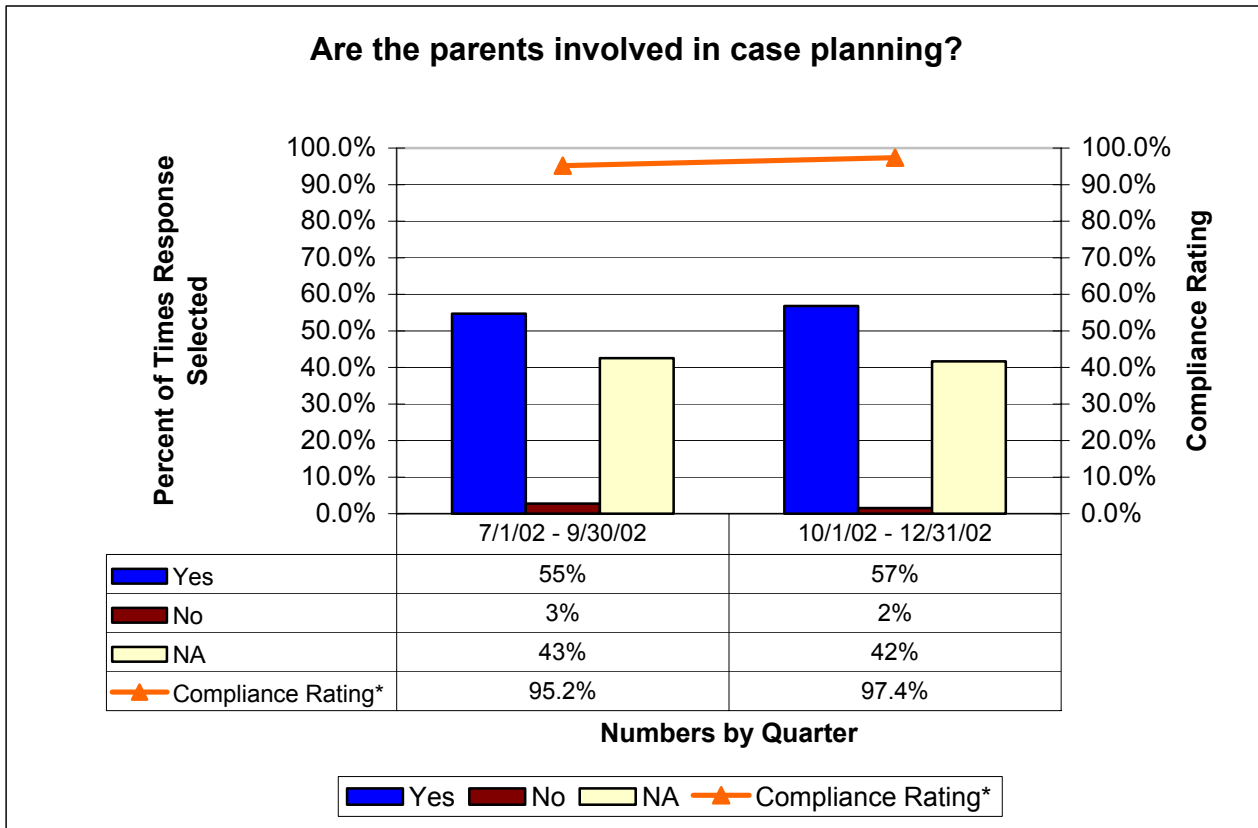
Given these requirements, and the importance of involving all appropriate family members in case planning, the Administrative Review Division monitors this area through the use of several questions. Starting on Page 10, each of these questions is looked at individually below.

Involvement of Parents in Case Planning

Involvement of Both Parents

During the first half of SFY 2002 – 2003, the Administrative Review Division monitored parent’s involvement in case planning through one question, “Are the parent(s) involved in case planning?”. This question was answered based upon the involvement of a parent in case planning. As seen in Chart 3, while only slightly higher than half of the cases had parental involvement in case planning, this actually led to a high level of compliance with the requirements due to parental involvement not being applicable in a high percentage of cases. Specifically, statewide compliance was at 95.2% for the first quarter and an even higher 97.4% for the second quarter of the fiscal year.

Chart 3: Parental involvement in case planning

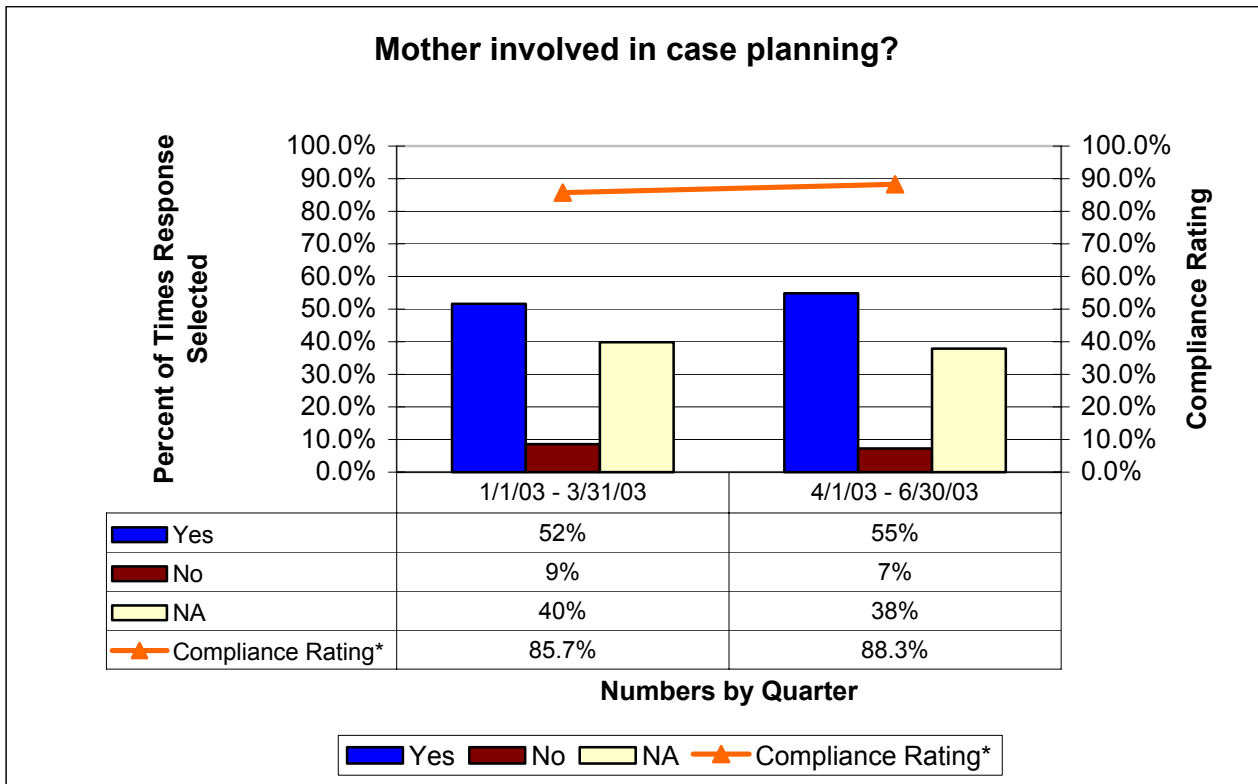


*Compliance Rating = (Y/(Y+N))

Involvement of Mother in Case Planning

Beginning with January 1, 2003, the Administrative Review Division started to measure parental involvement in case planning separately for each parent/guardian. This was done to increase the specificity of information being collected to monitor the state’s conformity for the Program Improvement Plan developed in response to the Child and Family Services Review. By gathering data separately for involvement of the mother and father, the state and counties can more accurately examine their ability to involve each parent and then target interventions for improvement as appropriate based upon the findings. Chart 4 shows the results of the last two quarters of the year for mothers, as monitored by the question, “Is there any indication through the case file read or the face to face review that the biological/legal mother/legal guardian has been involved in the case planning?” It is interesting to note that while the percentage of Yes responses for mothers remained

Chart 4: Mother’s involvement in case planning.



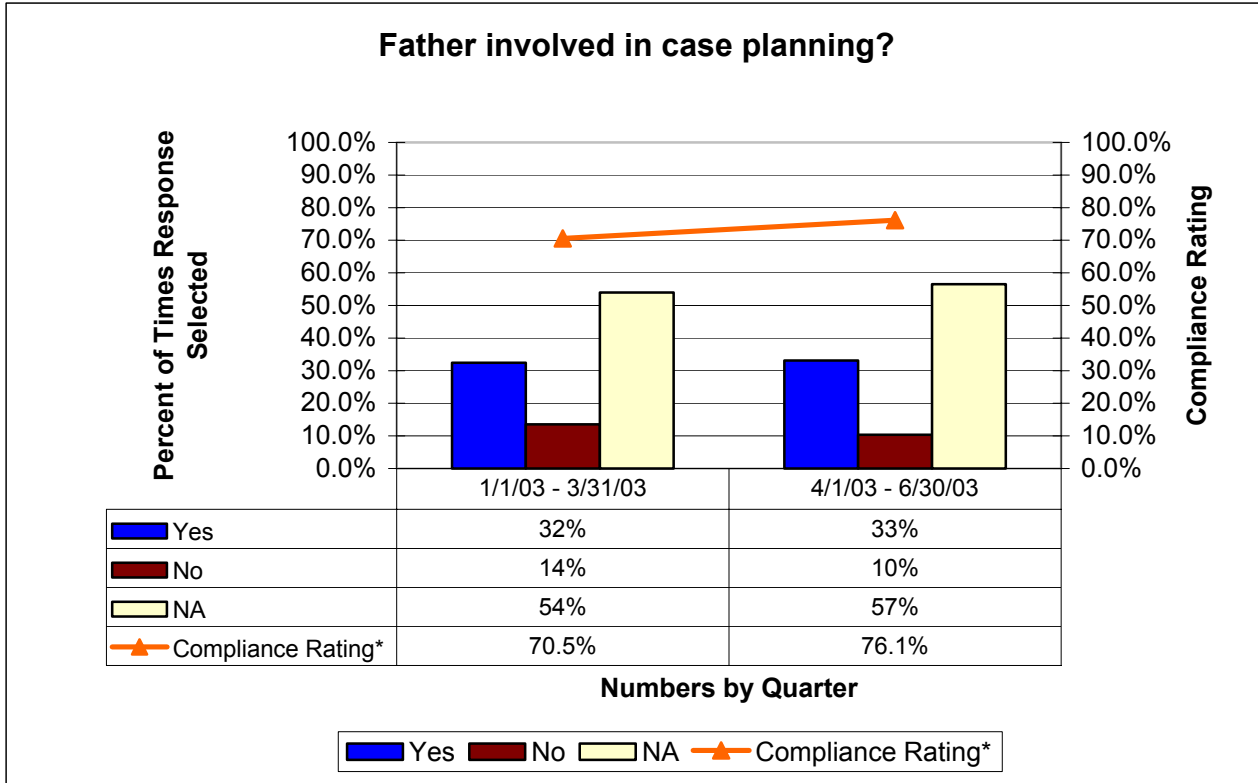
* Compliance Rating = (Y/(Y+N))

relatively similar to that of the combined question, the compliance rating experienced a notable decrease. Specifically, the statewide Compliance Rating for the involvement of mothers in case planning was 85.7% for the third quarter and 88.3% in the fourth quarter. It was encouraging to see the slight increase in compliance between the third and fourth quarter, and may reflect a growing awareness of the counties and caseworkers of the new method of measurement as well as the importance of looking at parents individually as opposed to one unit.

Involvement of Father in Case Planning

As was the case with mothers, effective January 1, 2003, reviewers looked at the father’s involvement in case planning separately, although the wording of the question was similar. “Is there any indication through the case file read or the face to face that the biological/legal father/legal guardian has been involved in the

Chart 5: Fathers’ involvement in case planning.



* Compliance Rating = $(Y/(Y+N))$

case planning?” Here again, the compliance rating for involving fathers in case planning was found to be significantly lower than with the combined question. In addition, as compliance ranged from a low of 70.5% during the third quarter to a higher 76.1% compliance in the fourth quarter, involvement of fathers was even lower than that of mothers. Given the federal findings from the Child and Family Service Review that indicated that Colorado needed to improve on the involvement of fathers in child welfare cases, this is perhaps not surprising. With this in mind, it was even more encouraging to note a larger level of improvement between the quarters for the father, thus beginning to close the discrepancy gap in involvement between mothers and fathers.

Involvement of the Child in Case Planning

While the preceding section discussed the involvement of the parents in developing the case plan, caseworkers are also required to involve the child when it is deemed appropriate. In addition to the Volume VII citations provided earlier, there are two others that refer specifically to the necessity for involving the child:

Volume VII

7.301.24 Family Service Plan Out of Home Placement Documentation

For child(ren) in out of home placement, the Family Services Plan documents:

K. For youth age 16 and older, a description of services and a plan for accomplishing tasks to assist the youth in preparation for self-sufficiency and independent living as early in placement as possible but no later than 60 calendar days after the youth’s 16th birthday.

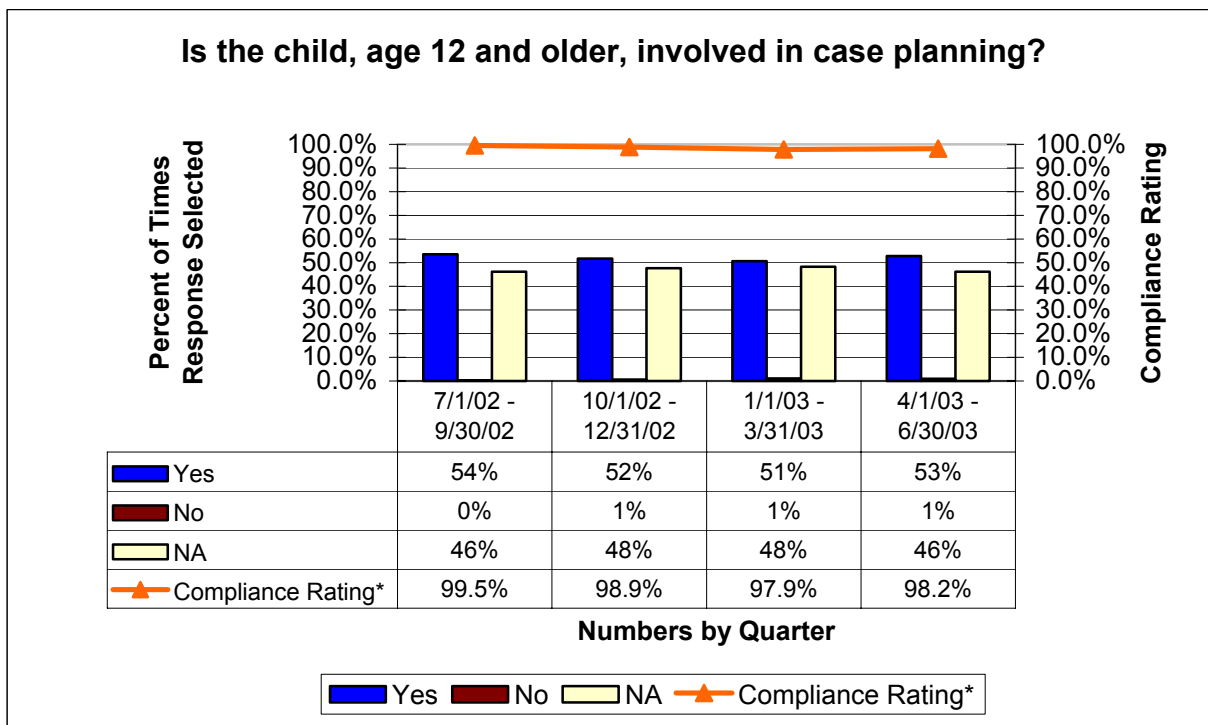
7.305.3 Specific Procedures

C. Independent Living Plan (ILP)

Following assessment, the independent living plan shall be developed jointly by the youth, caseworker, care provider(s), and other significant persons or agencies.

In order to measure the statewide and county level compliance with this issue, the Administrative Review Division used the following question throughout the SFY: “Is the child, age 12 and older, involved in the case planning, including Chafee or Independent Living Plan?” As shown in Chart 6 below, statewide compliance on this item was particularly high, nearing 100% for the entire year.

Chart 6: Child involvement in case planning.



* Compliance Rating = (Y/(Y+N))

Family Service Plan

Signatures on the Family Service Plan (FSP)

As the main function of the Family Service Plan is to serve as the definition of the end goal of services, and the plans for how to achieve that goal, it is required that the family members involved in the case sign the FSP as an indication of their involvement and agreement with the plan.

7.301.22 Family Service Plan Participants

The county shall assure that the following parties participate in the development of the Family Services Plan:

- Caseworker
- Parent(s) or legal guardians
- Child
- Immediate and extended family members as appropriate to the family and child's service needs
- Service provided and out-of-home caregivers

All parties shall sign the plan and the caseworker's supervisor shall approve and sign the plan. The caseworker shall provide all parties with a copy of the signed plan. The reasons for any absence of signatures shall be documented on the plan. If the caseworker is unable to involve both parents, child, or provider, the efforts to do so and the reasons for the inability to do so shall be documented on the plan.

7.301.3 Family Services Plan Review and Updates

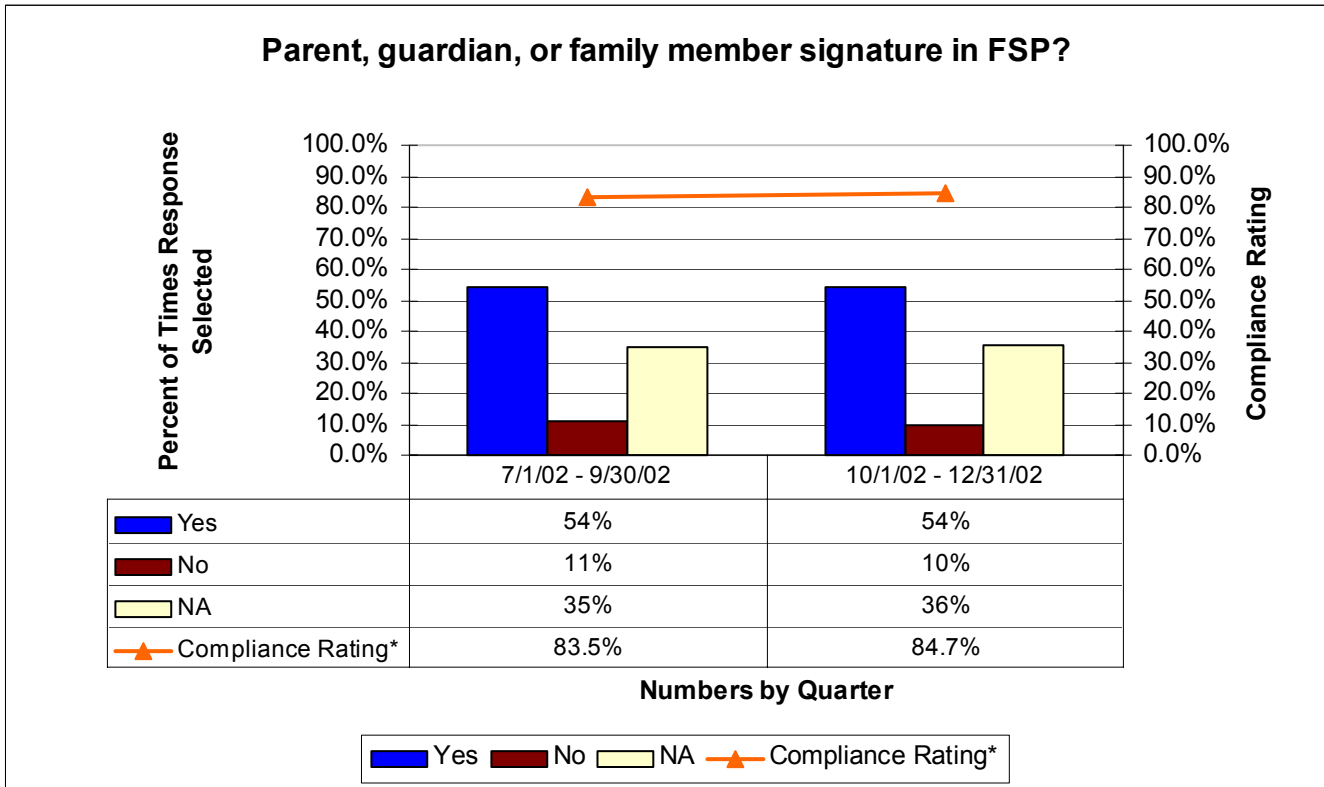
A continuing reassessment and documentation of the Family Services Plan in relationship to progress to goals shall be done. If a significant change in client service needs occurs, a redetermination of eligibility and/or a reassessment of services shall occur and the Family Services Plan shall be amended, if applicable.

- A. The Family Services Plan shall be reassessed prior to termination of the plan.
- B. The reassessment should be performed jointly with the client and in situations where joint evaluation cannot occur; the reasons shall be documented in the case record.
 1. Family members' signatures should be obtained on the plan at the time of the review.

Parent’s Signature

For the first two quarters of SFY 2002 – 2003, the Administrative Review Division monitored statewide and county compliance with parents signatures on the FSP through one question; “Are signatures of parent(s), guardian(s), and/or other appropriate family member(s) in the Family Services Plan?” As noted in Chart 7 (above), compliance with this requirement was generally quite good statewide, ranging from 83.5% to 84.7% across the first and second quarter respectively. This shows that, of those

Chart 7: Parent signature on Family Service Plan.



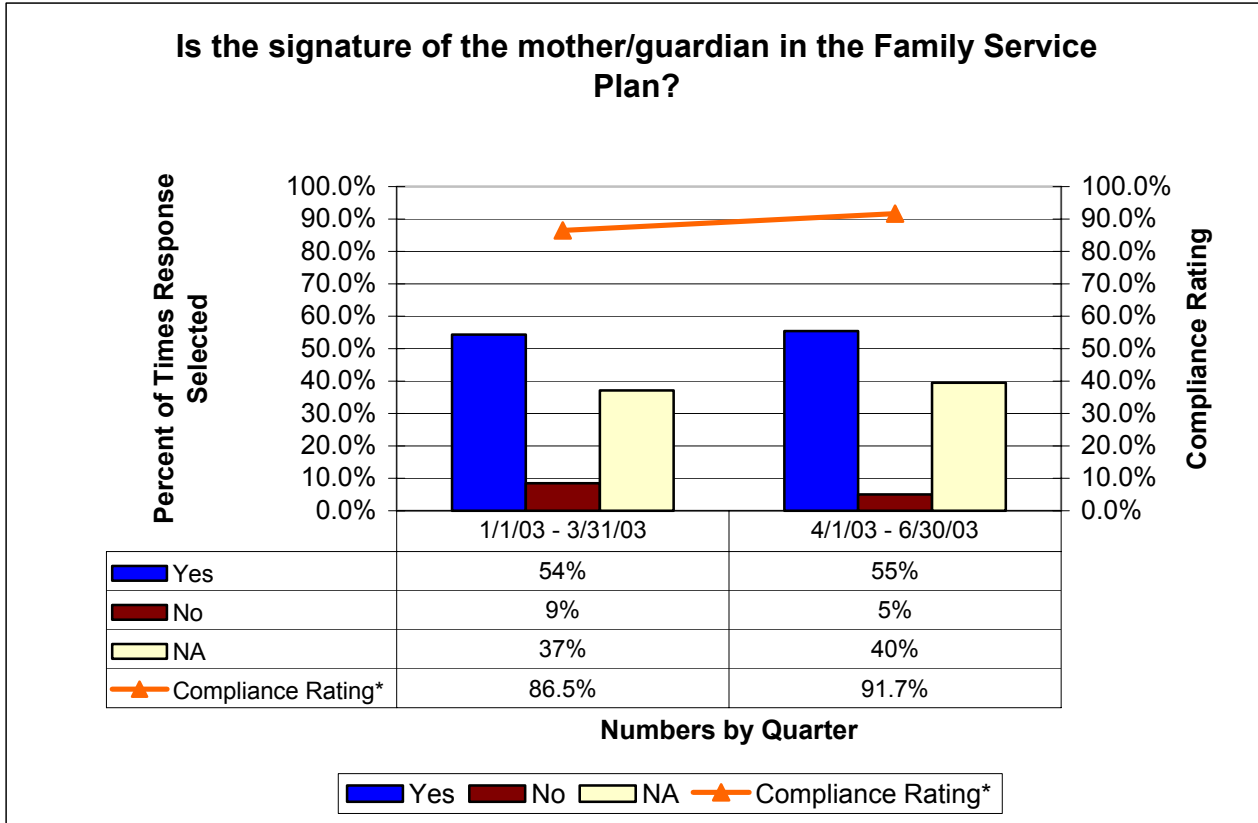
* Compliance Rating = (Y/(Y+N))

cases where the signature of parents was required, they were not found in 16.5% and 15.3% of the cases across the respective quarters.

Signature of the Mother on the Family Services Plan

In January of 2003 the Administrative Review Division started to use two separate questions to monitor parental signatures: one for the mother and one for the father. Here again, this was in response to a need for more detailed measurement of performance to assist in monitoring performance on the State of Colorado’s Performance Improvement Plan.

Chart 8: Signature of mother on Family Service Plan.



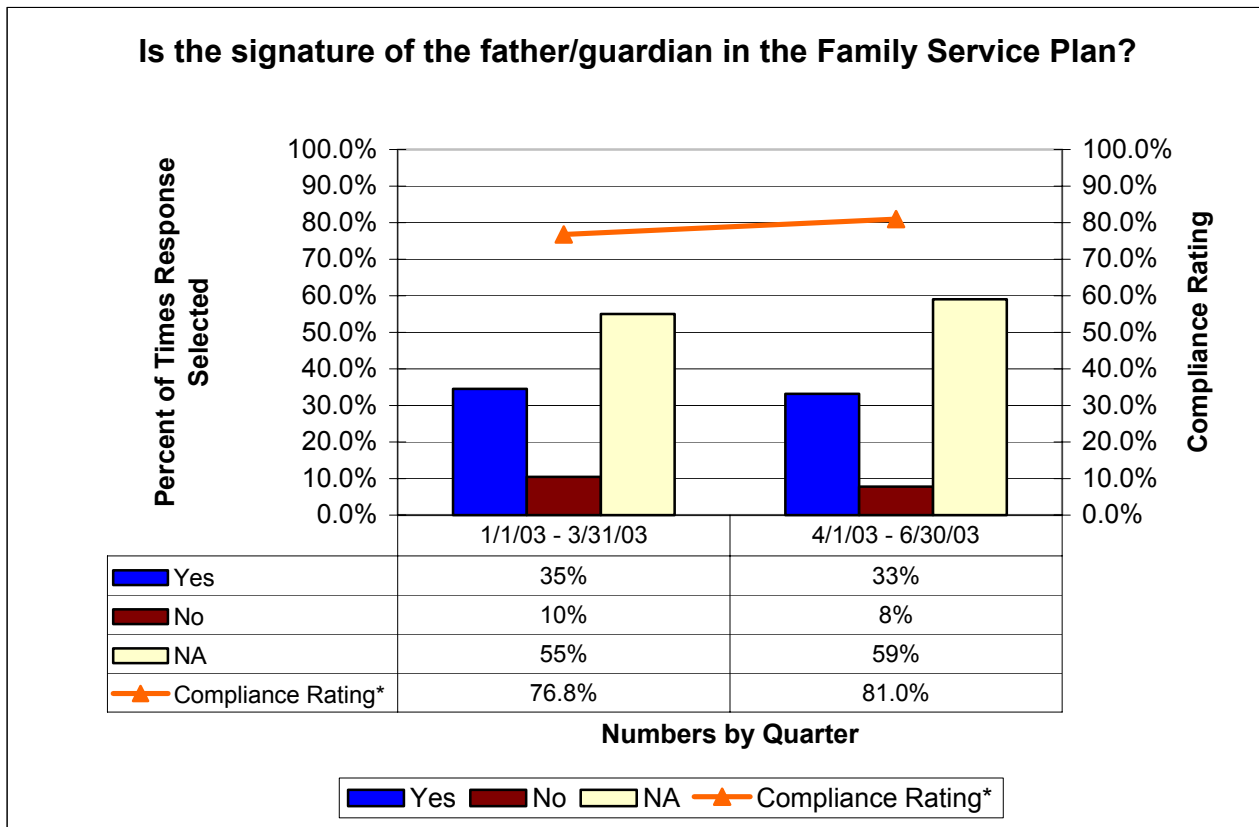
* Compliance Rating = (Y/(Y+N))

Performance statewide for meeting compliance with the mother’s signature on the Family Service Plan was actually higher than when reviewers had been looking for both signatures. For the third quarter, the mother’s signature was found on 86.5% of the Family Service Plans (a 1.8% increase from the second quarter findings when looking at both signatures), and on 91.7% of the required Family Service Plans in the fourth quarter.

Signature of Father on Family Service Plan

Although slightly lower than for mothers, father’s signatures were generally found on the FSP Part 3D when it was applicable to the case. For example, as displayed in Chart 9, 76.8% of the applicable cases had the signature of the father in the third quarter of the SFY, and this improved to 81% in the fourth quarter. It is hoped that as the Administrative Review Division continues to focus on the importance of involving both the mother and father (when appropriate) in the case planning that this percentage will continue to show improvement over time.

Chart 9: Signature of Father in the FSP

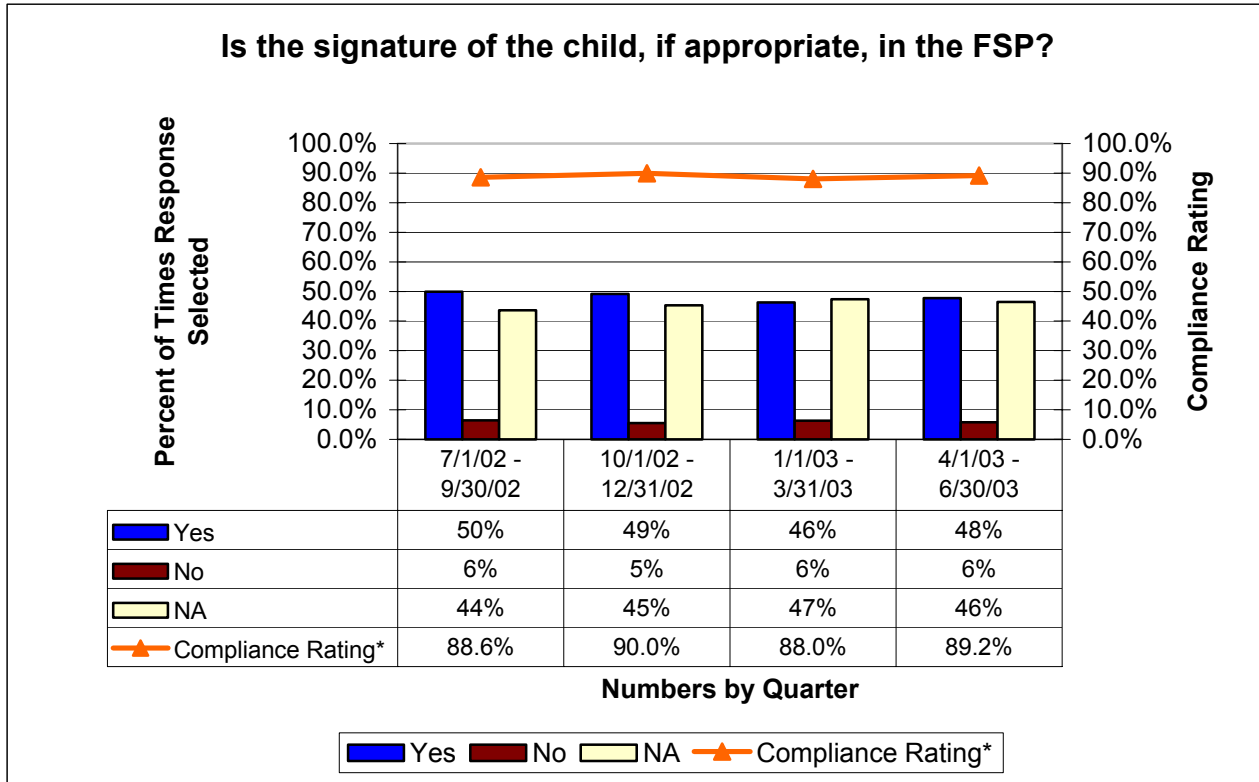


One last point regarding the signatures and involvement of parents needs consideration. In examining the findings for the individual questions asked during the third and fourth quarters of the SFY, there are a high percentage of cases where the questions did not apply. Specifically, 37% and 40% of the cases for mothers and 55% and 59% of the cases for fathers were rated as Not Applicable (NA) during the third and fourth quarters respectively. It should be noted that NA can be selected for several reasons: if the FSP contains documentation that there is no mother/father involved in the case (parental rights have been terminated, whereabouts are unknown, or deceased), or if the review was a subsequent review. The majority of these NA responses fall into the category of being a subsequent review.

Signature of the Child on the Family Service Plan

Throughout the course of the 2002 - 2003 SFY, reviewers also looked to ensure that the signature of the child, if appropriate, was included on the FSP Part 3D. The specific question used throughout the entire year was, “Is the signature of the child in the Family Services Plan and on the Independent Living Plan, if appropriate?” Here, the response option of Not Applicable was to be selected if the child was less than 12 years of age, or if the child had a disability that suggested signing was not appropriate and the child had not yet reached the of age 16 years plus 60 days. As Chart 10 shows, the child’s signature was found on anywhere from 88% (third quarter) to 90% (second quarter) of the FSP’s in applicable cases.

Chart 10: Signature of Child in the Family Service Plan



Visitation

Visitation between the parent(s) and the child is viewed as an important component in maintaining and improving the familial relationship, specifically if the permanency goal is to return home. The Administrative Review Division tracked the frequency with which visitation was occurring. Specifically, Volume VII requires that:

7.301.24 Family Service Plan Out-of-Home Placement Documentation

For child(ren) in out-of-home placement, the Family Service Plan documents:

- J. A description of the services provided to reunite the family, including the plan for visitation, or to accomplish another permanency goal. The visitation plan shall specify the frequency, type of contact, and the person(s) who will make the visit...

7.304.64 Visitation and Supervision

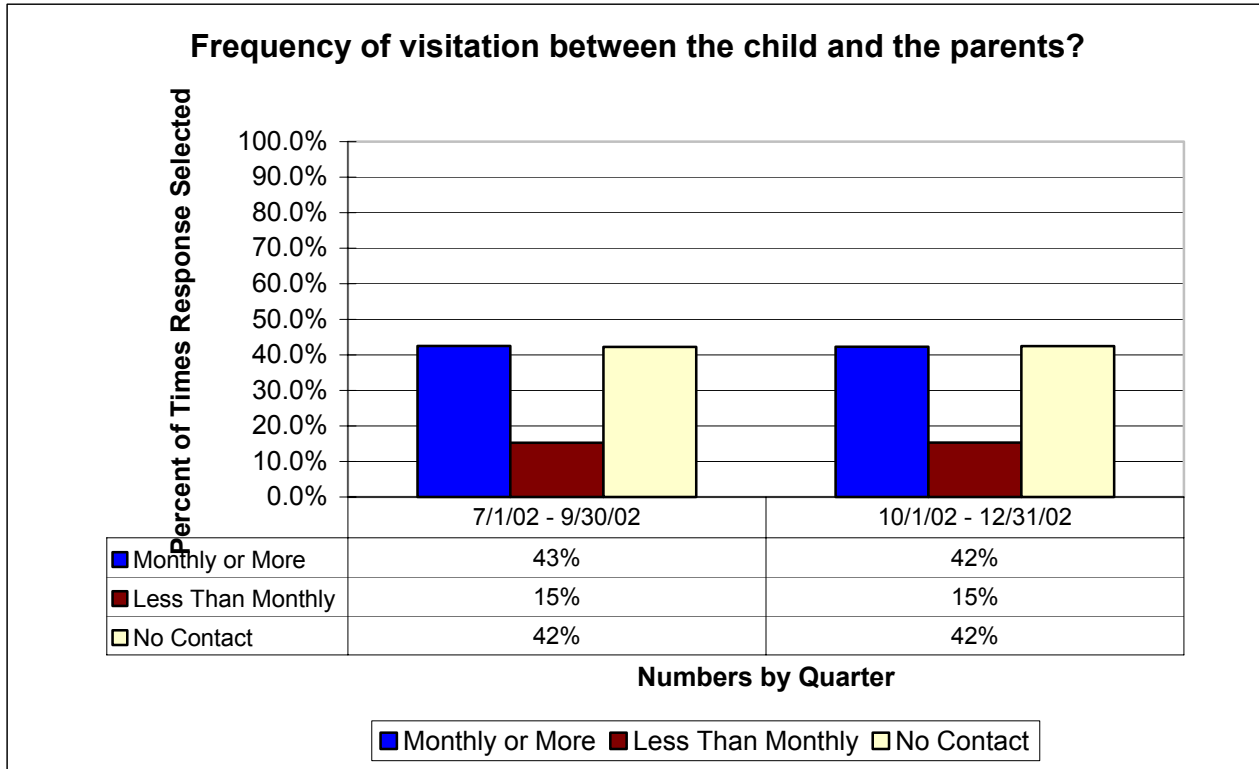
- B. In all cases where counties have primary responsibility for a child in out-of-home placement, an appropriate visitation plan shall be established and documented in the child's case record. The visitation plan shall specify the frequency and type of contact by the parents (unless parental visitation is determined to be detrimental to the child) and others with the child, as appropriate. At a minimum, the visitation plan should provide methods to meet the following interests and needs of the child:
 1. the growth and development of the child;
 2. the child's adjustment to the placement;
 3. the ability of the provider to meet the child's needs;
 4. the appropriateness of parent and child visitation, including assessment of risk;
 5. the child's contact with parents, siblings, and other family members;
 6. the child's permanency plan.
- C. Visitation between the child and his/her family shall increase in frequency and duration as the goal of reuniting the family is approached. The caseworker shall document this increase in visitation in the child's case record.

The Administrative Review Division documented if visitation was occurring "Monthly or More", "Less than Monthly", or "No Contact". Here, the No Contact (Not Applicable) option was selected if there was no contact between the parent(s) and child, if parental rights had been terminated, or if there was no parental involvement for any other reason. Similar to the previous parental questions, during the first two quarters this was a combined question that was then asked separately for each parent during the last two fiscal quarters.

Frequency of Visitation Between Child and Parents

During the first two quarters of the year the Administrative Review Division asked one combined question for both parents. In the first quarter, children for whom this question applied were having visitation at least monthly, and perhaps more frequently, in 43% of the cases reviewed. An additional 15% were having visitation less than monthly, while the remaining 42% were selected as Not Applicable. The results were nearly identical for the second quarter, with overall percentage differences being due to statistical issues of rounding rather than practice.

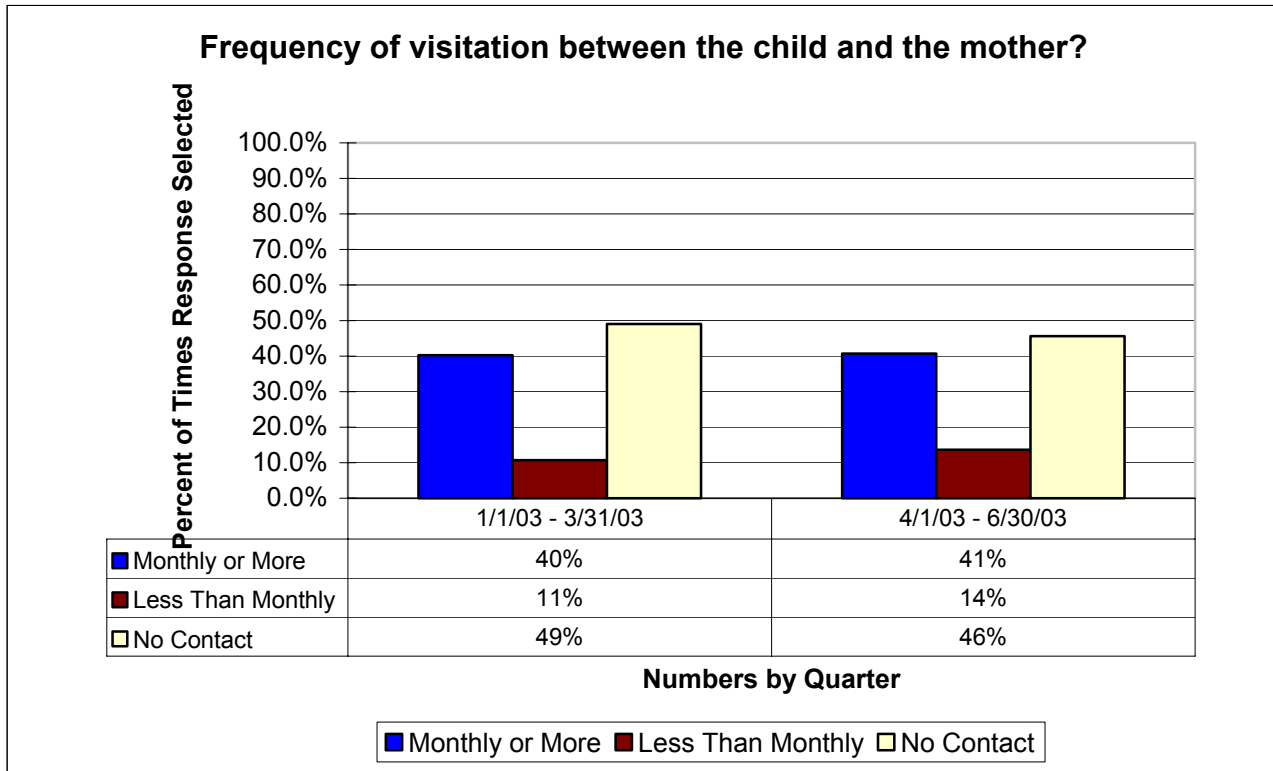
Chart 11: Frequency of Visitation between the Child and Parent(s)



Frequency of Visitation Between Child and Mother

At the beginning of the third quarter, the Administrative Review Division separated out the visitation question to individually measure visitation with the mother and father. Chart 12, below, displays the results for visitation between the mother and child. Overall, 40% and 41% of the children were having visitation with their mother at least monthly during the third and fourth quarters respectively. Additionally, 11% and 14% were having visitation that occurred on a less than monthly basis. It should be noted that a high percentage of the cases (49%, third quarter; 46%, fourth quarter) had the Not Applicable response option selected.

Chart 12: Frequency of visitation between the child and the mother

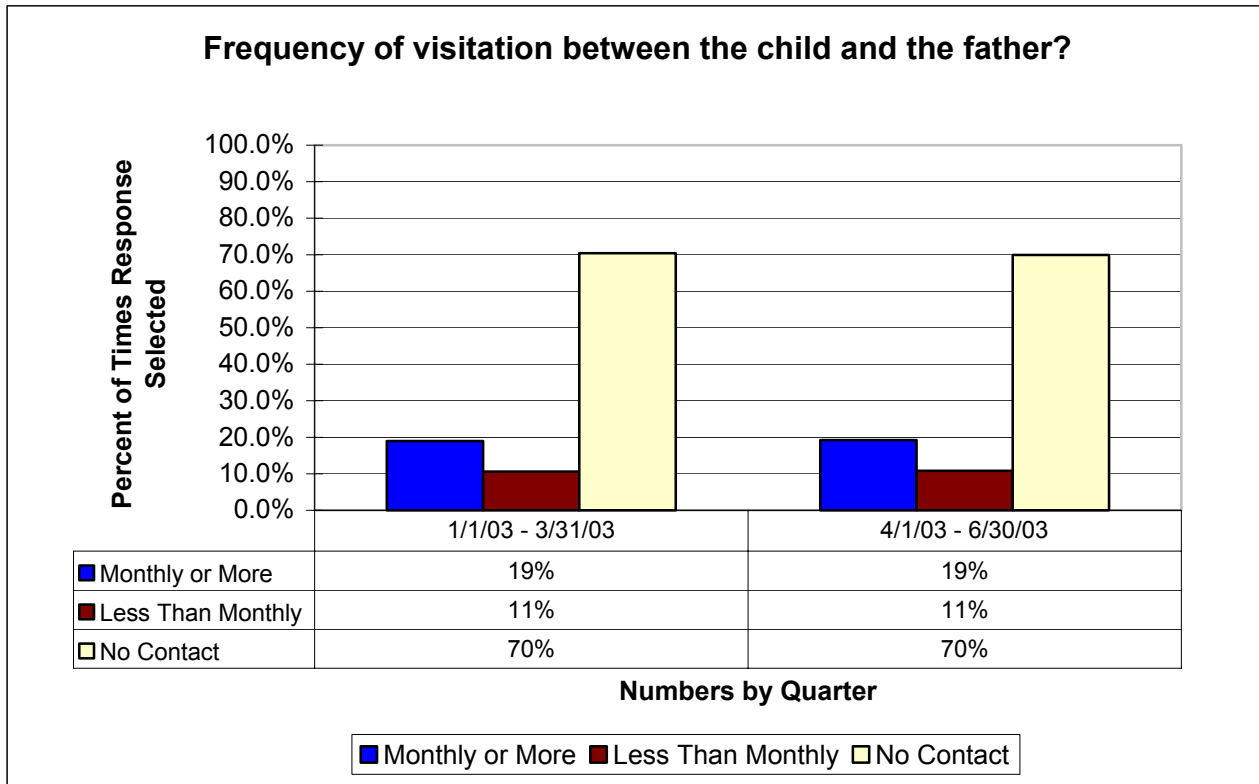


Frequency of Visitation Between Child and Father

Visitation between children in out-of-home care and their fathers appeared to occur for fewer children, and less frequently when it did occur. For example, for both the third and fourth quarter of the SFY, approximately 70% of the children reviewed had the response option of Not Applicable selected. Remembering that this option means that no contact occurred as a result of parental rights being terminated or a lack of involvement of the father for other reasons helps add a degree of meaning to this finding. While there could be numerous, valid reasons for not involving the father in visitation, these percentages are most likely higher than they should be. Therefore, it would be in the best interest of the children if the State of Colorado and the individual counties examined case practice in this regard and looked to find ways of increasing the involvement of fathers in the case, and specifically in visitation.

For those children where visitation was occurring, 19% of the children were visiting with their fathers at least once per month, while an additional 11% were having visitation that occurred on a less than monthly basis.

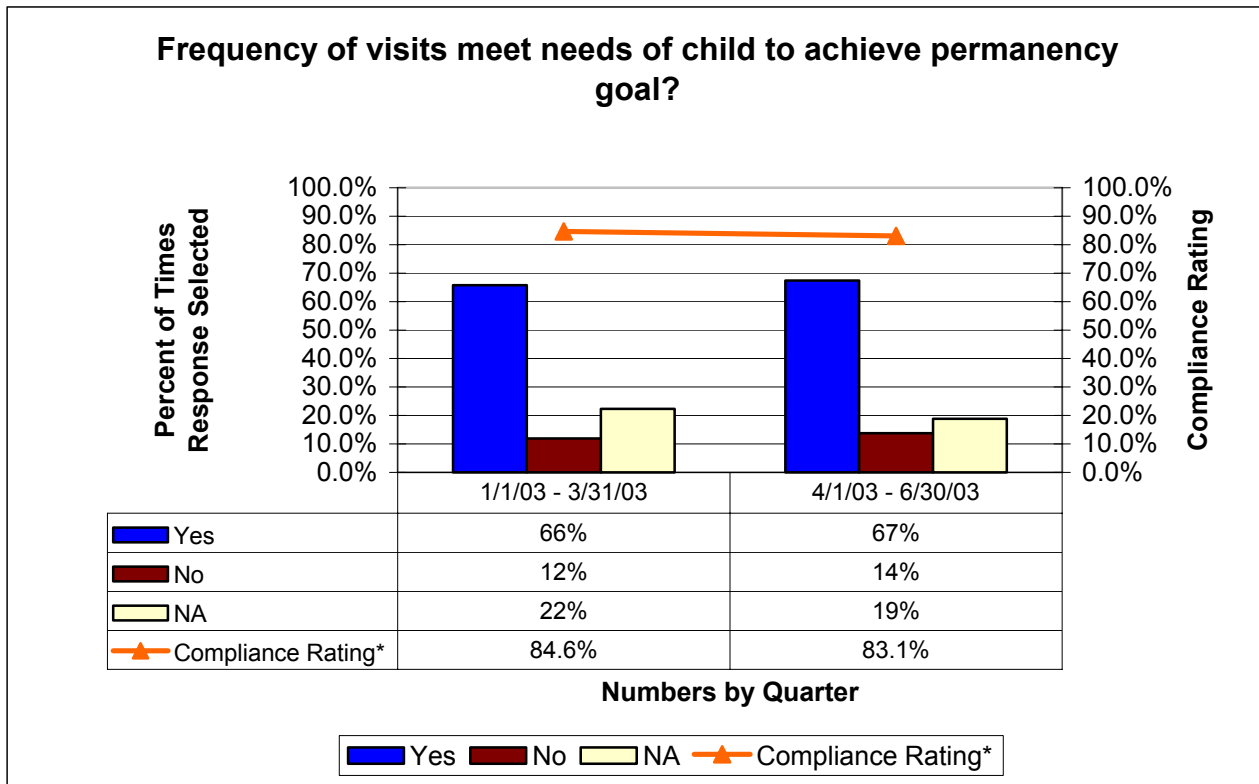
Chart 13: Frequency of Visitation between the Child and Father



Achieving the Permanency Goal

While the previous questions discussed provided a rough measurement of the frequency of visitation, during the last two quarters of the fiscal year the Administrative Review Division included a question related to the adequacy of the frequency of visitation. As the Volume VII rules earlier indicate, the frequency and method of visitation should be directly related to the stated permanency goal for the child. As such, the new question that the Administrative Review Division started to ask was, “Does the frequency of visitation meet the needs of the child to achieve their permanency goal?” The results for both quarters are displayed in Chart 14. Overall, reviewer findings indicate that statewide compliance with achieving this goal are quite good, while still having room for improvement. For example, the third quarter findings indicated an 84.6% achievement while the fourth quarter exhibited a slight decline to 83.1%.

Chart 14: Frequency of visitation adequate to achieve permanency goal



Changes of Placement

Volume VII

7.301.24 Family Service Plan Out-of-Home Placement Documentation

For child(ren) in out-of-home placement, the Family Services Plan documents:

- C. The problems to be resolved in order to facilitate reunification of the child and family, and to safely maintain the child in the home.
- D. A description of the type of facility in which the child is placed, the reason(s) the placement is appropriate, and safe for the child. For children placed a substantial distance from the home of the parent(s) or in out-of-state placement, the county shall document how the placement meets the best interests of the child (see Section 7.304.54, J).
- E. A description of how the home is in reasonable proximity to the home of the parents or relatives and to the school the child has attended.
- F. That the placement is the least restrictive, safe, and most appropriate setting available consistent with the best interests and specific needs of the child. This includes documentation of initial and on-going efforts to place the child with kin.

If the child is moved to a more restrictive placement after the initial placement, the Family Services Plan documents how the more restrictive placement meets the child's needs.

7.304.62 Placement Activities

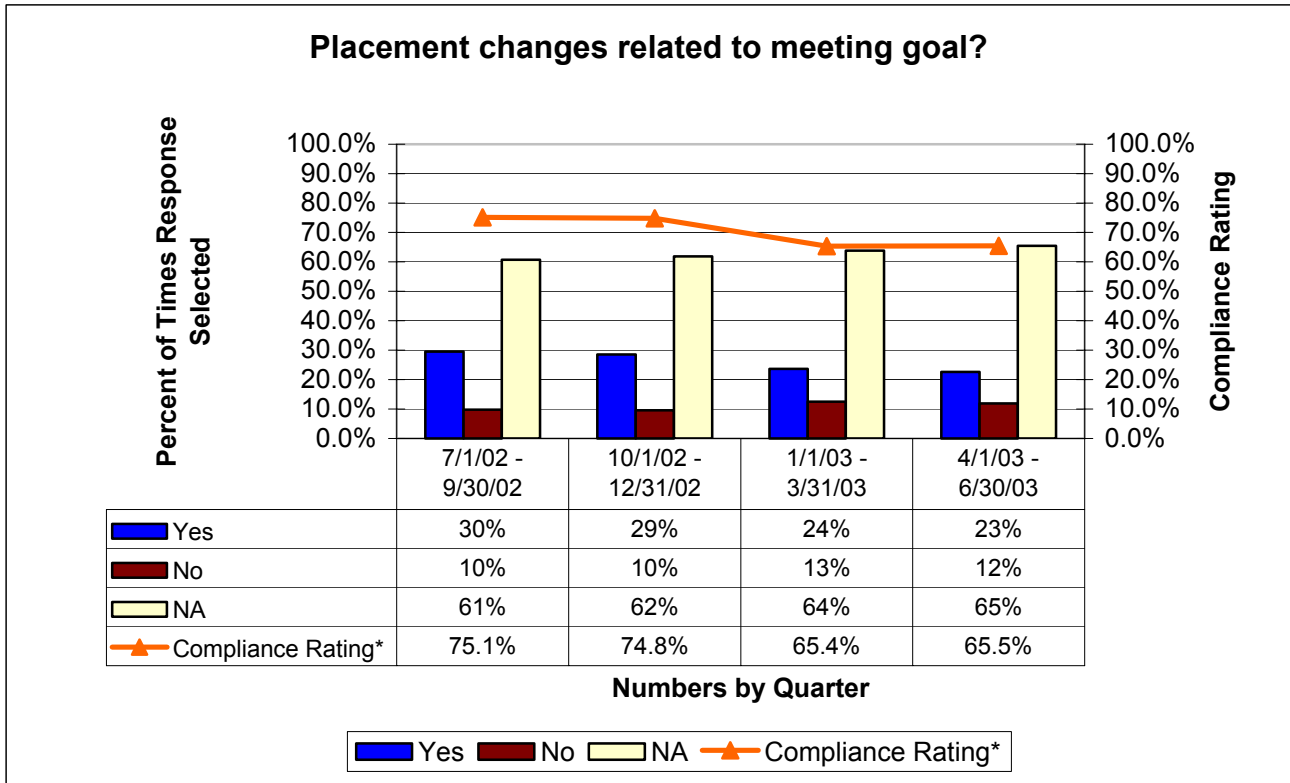
- K. No child shall be moved more than twice unless such move results in a permanent placement or is determined to be in the best interests of the child and the reasons for the additional move are documented in the child's Family Services Plan.

In accordance with the Volume VII cites listed above, and the best practice of only moving children when necessary, the Administrative Review Division reviewed each case file to determine "If placement change(s) occurred during the review period, were the reasons directly related to helping the child achieve the goals in his/her case plan?"

The findings displayed in Chart 15 can be interpreted in at least two different ways. The first is using the traditional method of calculating a compliance rating; taking the total number of Yes responses and dividing it by the total number of Yes responses plus the total number of No responses ($Y/(Y+N)$). Looking at the findings in this manner indicates an area that started the year off in a moderate position at best, and then declined. For example, compliance during the first two quarters was approximately 75%, whereas during the last two quarters it was at a lower 65%. This means that, of the children who experienced a move, 65% of them (during the last two quarters) were moved for reasons directly tied to achieving their permanency goal. The remaining 35% were moved for other reasons (e.g., the provider requested the move). These are not strong findings overall, and suggest that this is an area for state and county improvement initiatives.

A second, and perhaps equally meaningful, way of interpreting the results is to include the Not Applicable responses. For this particular question, Not Applicable response means that the child did not experience a move during the six-month review period. As Chart 15 shows, anywhere from 61% to 65% of the children did not experience a move. Adding the children who were moved for related reasons shows that from 88% to 91% of the children were either not moved, or moved for appropriate reasons. While these percentages look better overall, some degree of caution should be used with this latter interpretation, as it is possible that some children may have benefited from a change in placement even when a change did not occur.

Chart 15: Placement change related to meeting the child’s permanency goal



* Compliance Rating = (Y/(Y+N))

Case Review System

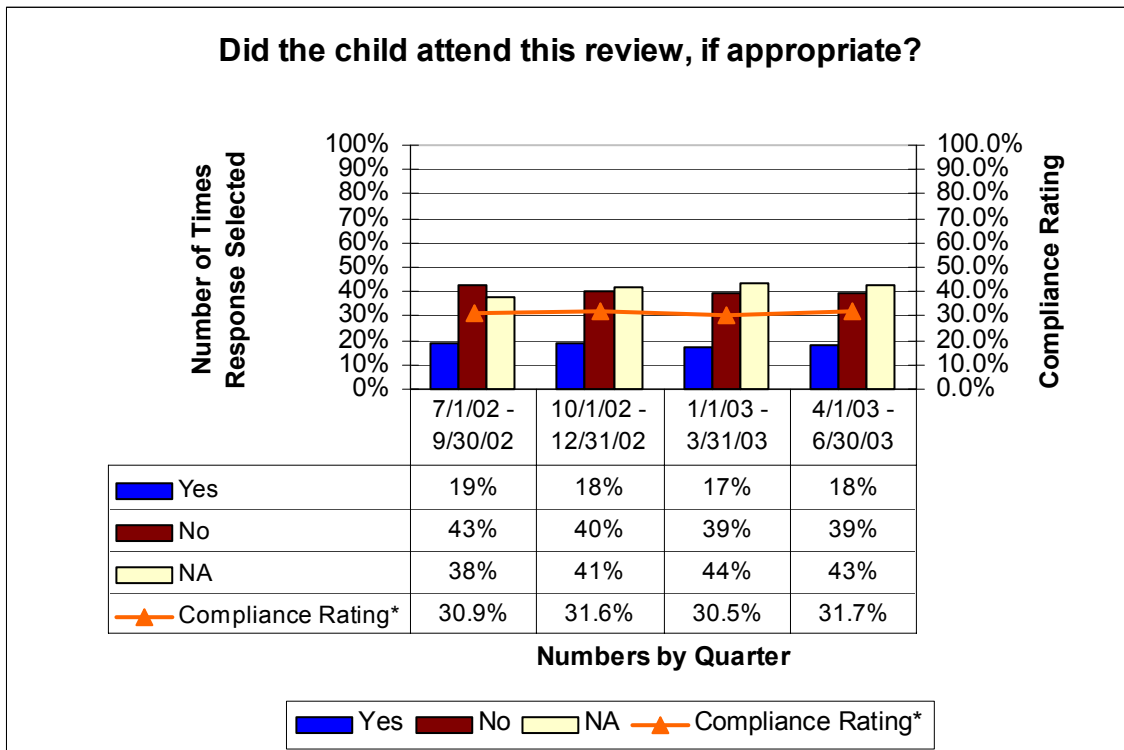
Review Attendance

As the administrative review system provides an opportunity for all parties involved in the case to have their concerns heard by an independent third party, it is essential that those with a stake in the case be present at the review. As such, the Administrative Review Division tracks the attendance of several key participants in each case, including the child, mother, and father.

Attendance by Child

Overall, attendance of children at Administrative Reviews was poor. Throughout the course of the year, only 17% to 19% of the children attended when appropriate. This equaled a compliance rating ranging from 30.5% to 31.7%. This is important as in over 50% of the cases, it was appropriate for the child to attend the review. Due to the poor level of attendance, and the importance of this issue, both the Administrative Review Division and counties should focus on finding ways to increase the attendance of children at the review when it is appropriate.

Chart 16: Review attendance of children



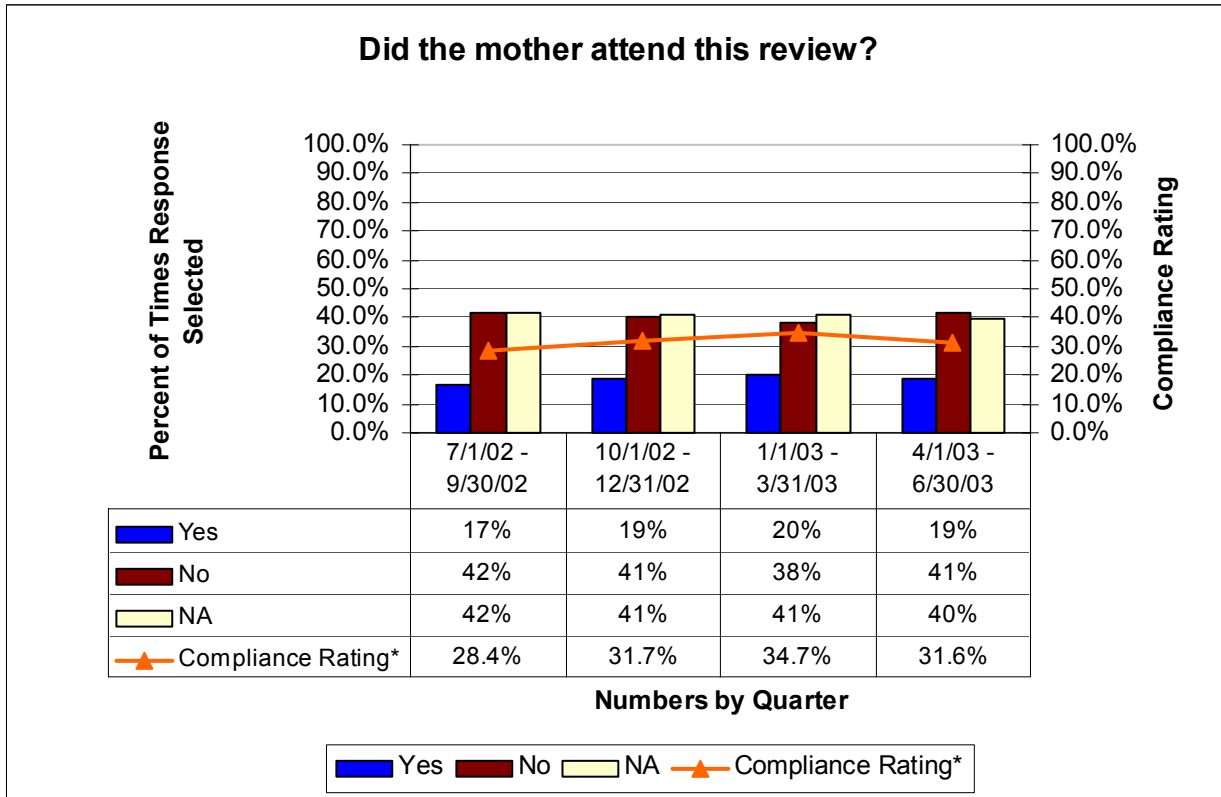
* Compliance Rating = (Y/(Y+N))

Attendance by Parents

Mother's Attendance

The Administrative Review Division also tracked attendance of the mother at the reviews. Similar to the children, attendance by mothers was equally poor. For example, while approximately 60% of the time it was appropriate for the mother to attend, the range of attendance was from 17% to 20%. This resulted in a compliance rating range of 28.4% to 34.7%. The data for the entire SFY is displayed in Chart 17.

Chart 17: Review attendance of mothers



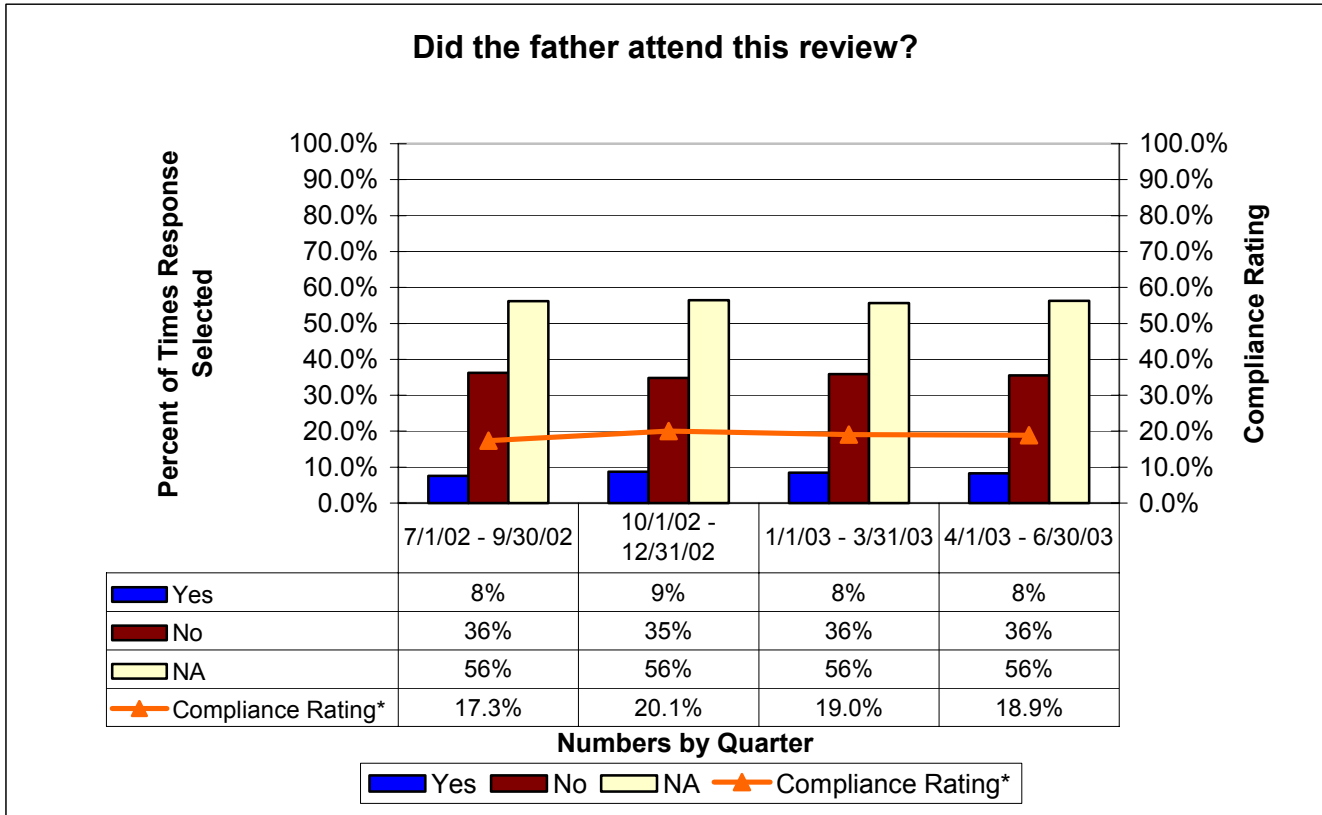
* Compliance Rating = (Y/(Y+N))

Father’s Attendance

Chart 18 shows the results for the attendance of fathers at administrative reviews. Overall, reviewers indicated that it was appropriate for the father to attend the review 44% of the time. However, out of those cases where it was appropriate, fathers were in attendance only 17.3% to 20.1% of the time. As approximately 80% of the fathers were not involved in the review, the was worst of any of three measured (child/mother/father), which matched the federal findings from the Child and Family Services Review that indicated that Colorado was not involving fathers in the case enough. One example of this was their statement regarding insufficient due diligence in locating fathers before categorizing them as “Whereabouts Unknown.” This example would be one of the reasons for such a high percentage of cases with Not Applicable as the response option.

Overall, attendance at administrative reviews was low for all three reported groups; the children, mothers, and fathers. As participation in the Administrative Reviews is one opportunity for these individuals to be involved and to have any concerns heard by an independent review party, the Administrative Review Division and the individual counties should work to find ways of increasing attendance of relevant parties.

Chart 18: Review attendance of fathers

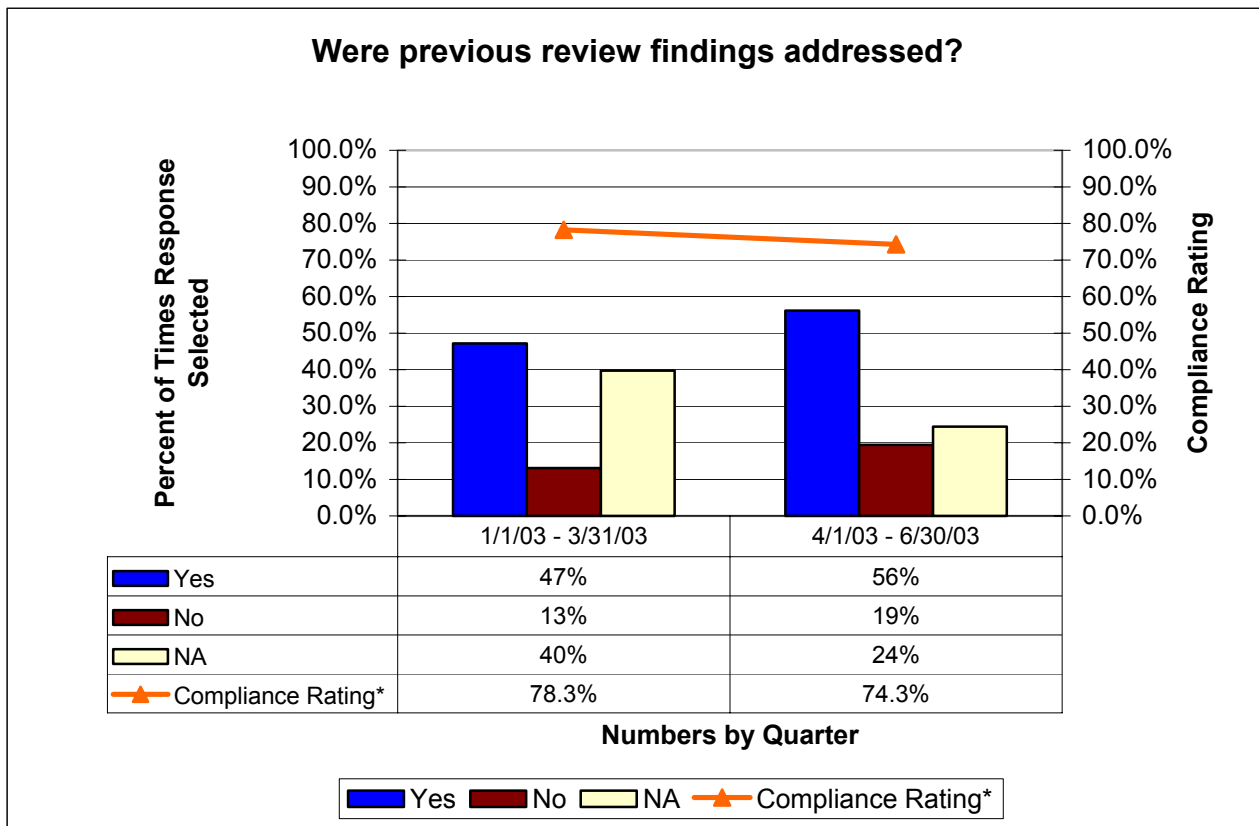


* Compliance Rating = (Y/(Y+N))

Previous Review Findings

As a result of conducting the administrative review, reviewers indicate any applicable comments, findings, or compliance issues in the child’s case file and discuss them with the caseworker. As a critical component of the Quality Assurance process, it is important that the Administrative Review Division be able to monitor whether or not necessary changes were made based upon the applicable review findings. To this extent, at mid-year the Administrative Review Division added the item “Were the previous review findings addressed?” This will allow the Administrative Review Division to monitor county follow-up and resolution of identified issues. As shown in Chart 19, while initial compliance was not strong during the third quarter (47%), as counties became more aware of this issue there was a 9% improvement in just one quarter, as the fourth quarter results were at 56%. The large drop in the percentage of Not Applicable responses also bears further discussion. Reviewers check Not Applicable when they are conducting an initial review, or if there were no previous review findings. The large drop from 40% in the third quarter to just 24% in the fourth quarter indicates that there were either fewer initial reviews in the fourth quarter, reviewers were completing more findings sheets for cases, or a combination of both. It is hoped that over time, as reviewers continue to complete findings sheets, and as counties become aware of the importance of resolving any issues found during the review, that the percentage of “Yes” responses to this question will increase while the “Not Applicable” and “No” responses continue to decline. However, it should also be remembered that the “Not Applicable” responses should have a lower limit due to initial reviews.

Chart 19: Were previous review findings addressed



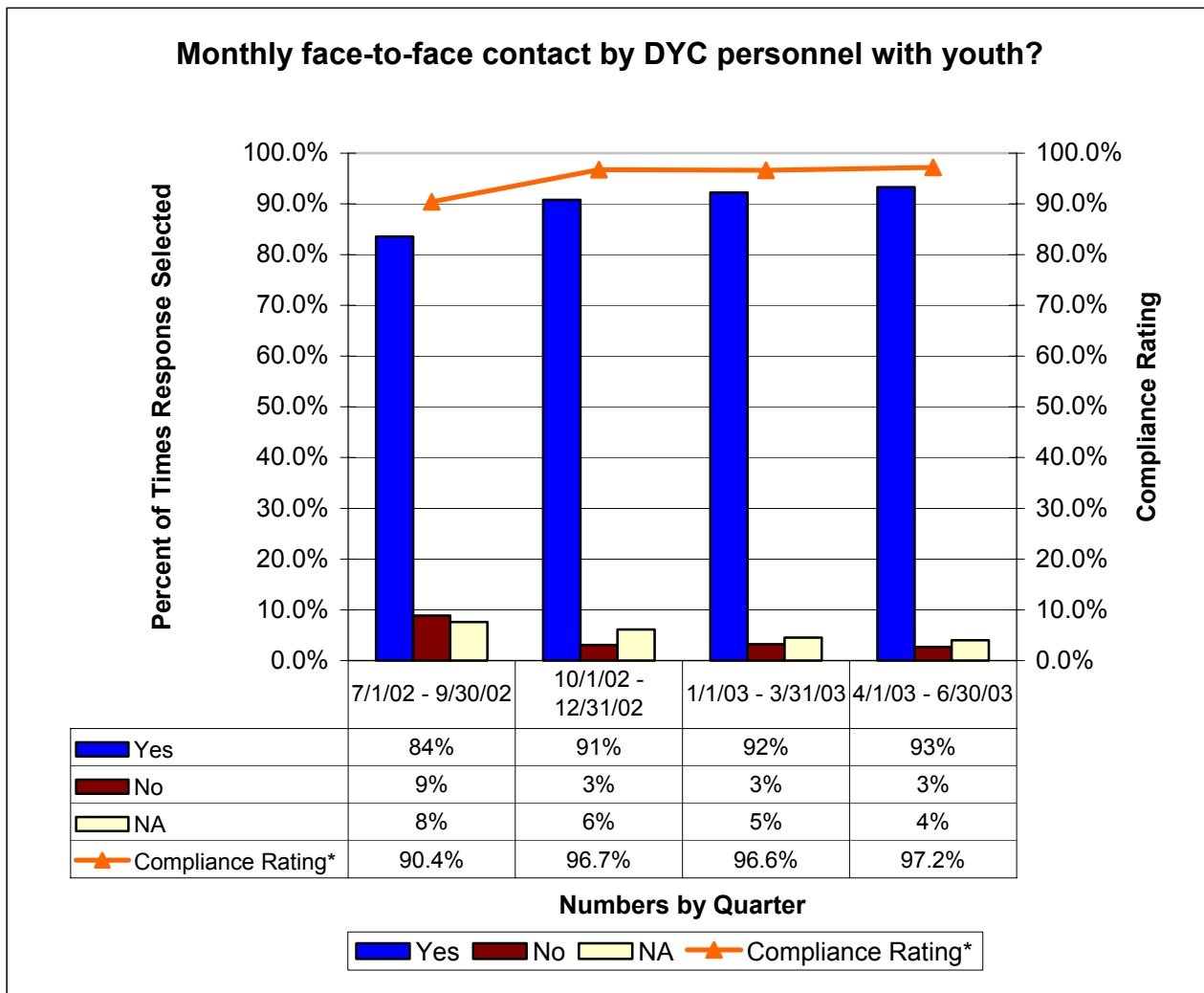
* Compliance Rating = (Y/(Y+N))

Section Three: Department of Youth Corrections Administrative Review Data Analyses

Monthly Contact with Youth

As regular contact with the youth is an important aspect of ensuring their safety and well-being, the Administrative Review Division also tracks whether or not Department of Youth Corrections personnel have contact with their children at least once per month. As Chart 20 below demonstrates, monthly contact between Department of Youth Corrections personnel and youth was occurring at a high rate. Specifically, compliance with this item ranged from a low of 90.4% in the first quarter to a high of 97.2% in the fourth quarter. In addition to the high compliance overall, it is important to note the strong improvement over the course of the year. This was particularly true between the first and second where there was an 6.3% increase in achieving monthly contact with youth.

Chart 20: Monthly face-to-face contact



* Compliance Rating = (Y/(Y+N))

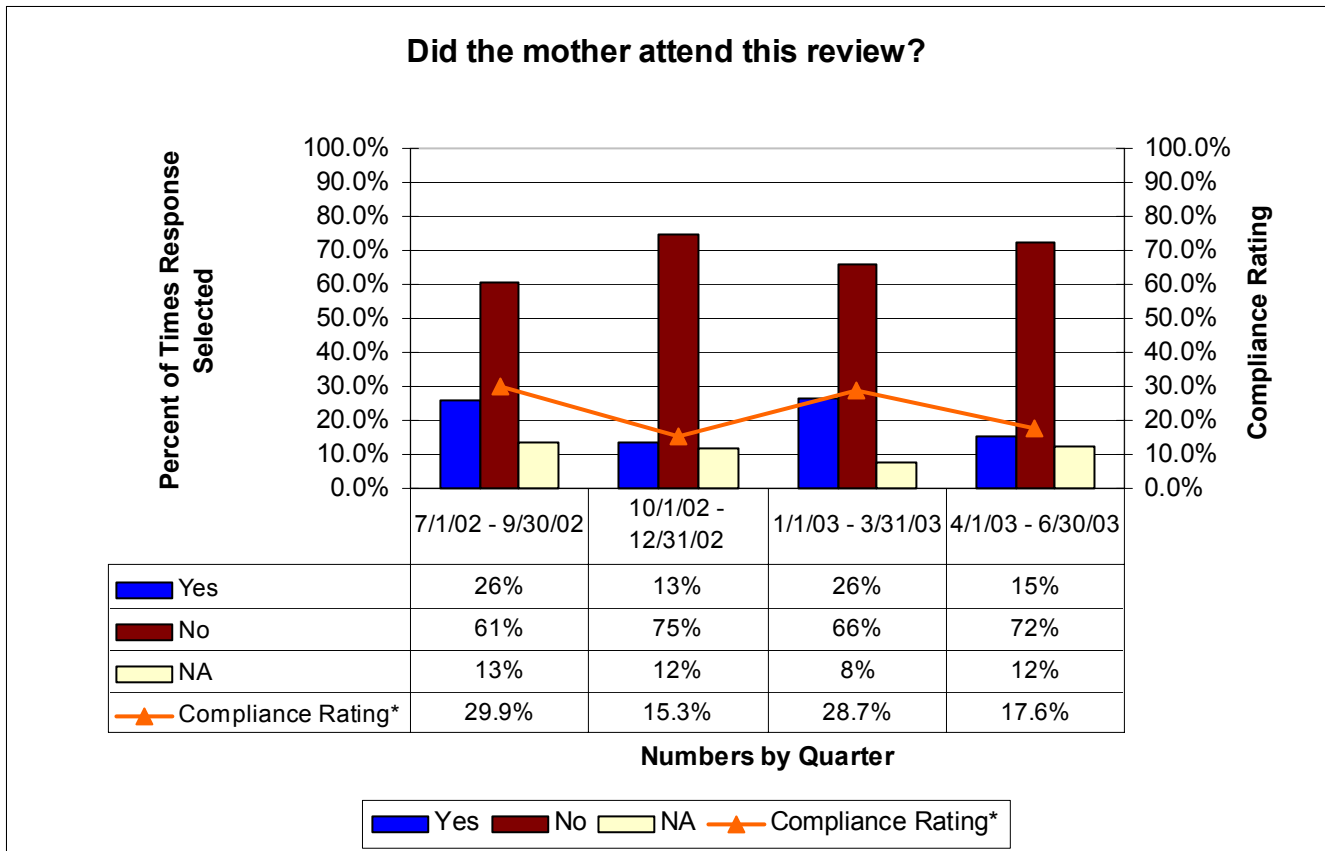
Review Attendance

Similar to the Administrative Reviews conducted in the county Departments of Human/Social Services, the Administrative Reviews held for the Department of Youth Corrections provide all stakeholders, and particularly parents, and opportunity to have any concerns heard by an independent party as well as to be involved in case planning. Therefore, as part of the data collected, reviewers indicate whether or not the mother, father, and child were present at the review. In particular, within the Department of Youth Corrections population, reviewers tracked attendance of the parents separately (i.e., one question for the mother and one for the father versus one for the parent(s)) for the entire state fiscal year.

Review Attendance of Mothers

Attendance of mothers at the administrative reviews was generally not high, ranging from a high compliance rating of 29.9% to a low of 15.3%. While this was a disappointing finding in general, it was also interesting to note a pattern that displays itself in Chart 21 (below). Review attendance by mothers fluctuated with each quarter, showing a trend of declining from the first quarter to the second, then rising again for the third quarter only to fall for the fourth quarter again. Another point the data readily makes apparent is that a mother’s attendance is not applicable in only a small percentage of the overall cases. This indicates that, as shown by the high percentage of No responses, the Administrative Review Division and Department of Youth Corrections are not being very efficacious in getting mothers to the reviews.

Chart 21: Review attendance of mothers

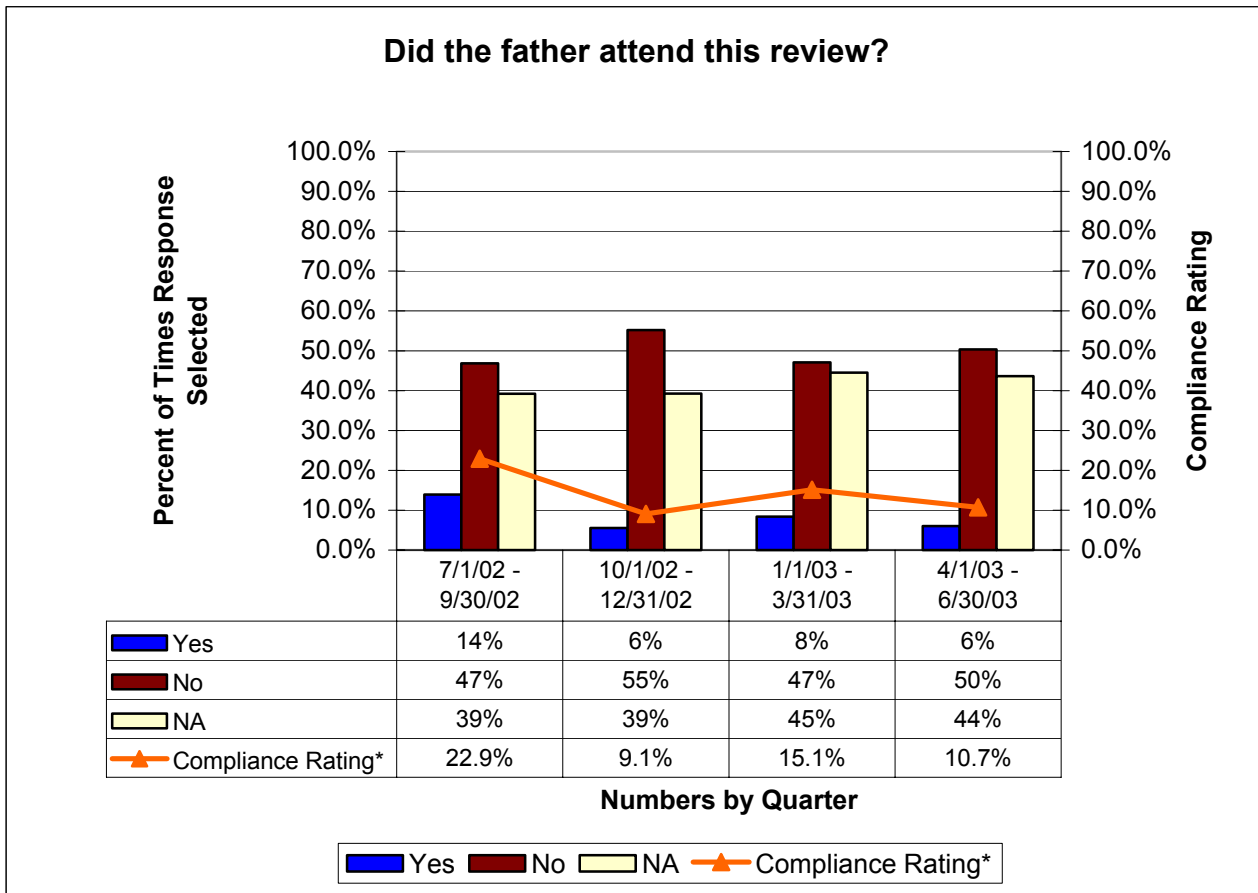


* Compliance Rating = (Y/(Y+N))

Review Attendance of Fathers

Similar to mothers, reviewers indicated for each review whether or not the father was in attendance, if appropriate. Below, Chart 22 shows three aspects of the results from this question that are readily apparent: 1) that attendance of fathers was even lower than that for mothers, 2) the data showed the same general trend of decreasing from the first to the second quarter, increasing for the third (although not to the same level as the first quarter), and then declining during the fourth quarter, and 3) similar to the mothers' attendance, the second quarter showed the lowest performance overall. Looking at the percentage of cases where the reviewers indicated that attendance of the father was Not Applicable does display that, unlike the mothers, for a relatively high number of cases the father's attendance was not applicable. It is unfortunate then, that for the cases where it would be appropriate and important, attendance was not higher nor did it show any long-term prospects for improvement with time.

Chart 22: Review attendance of fathers

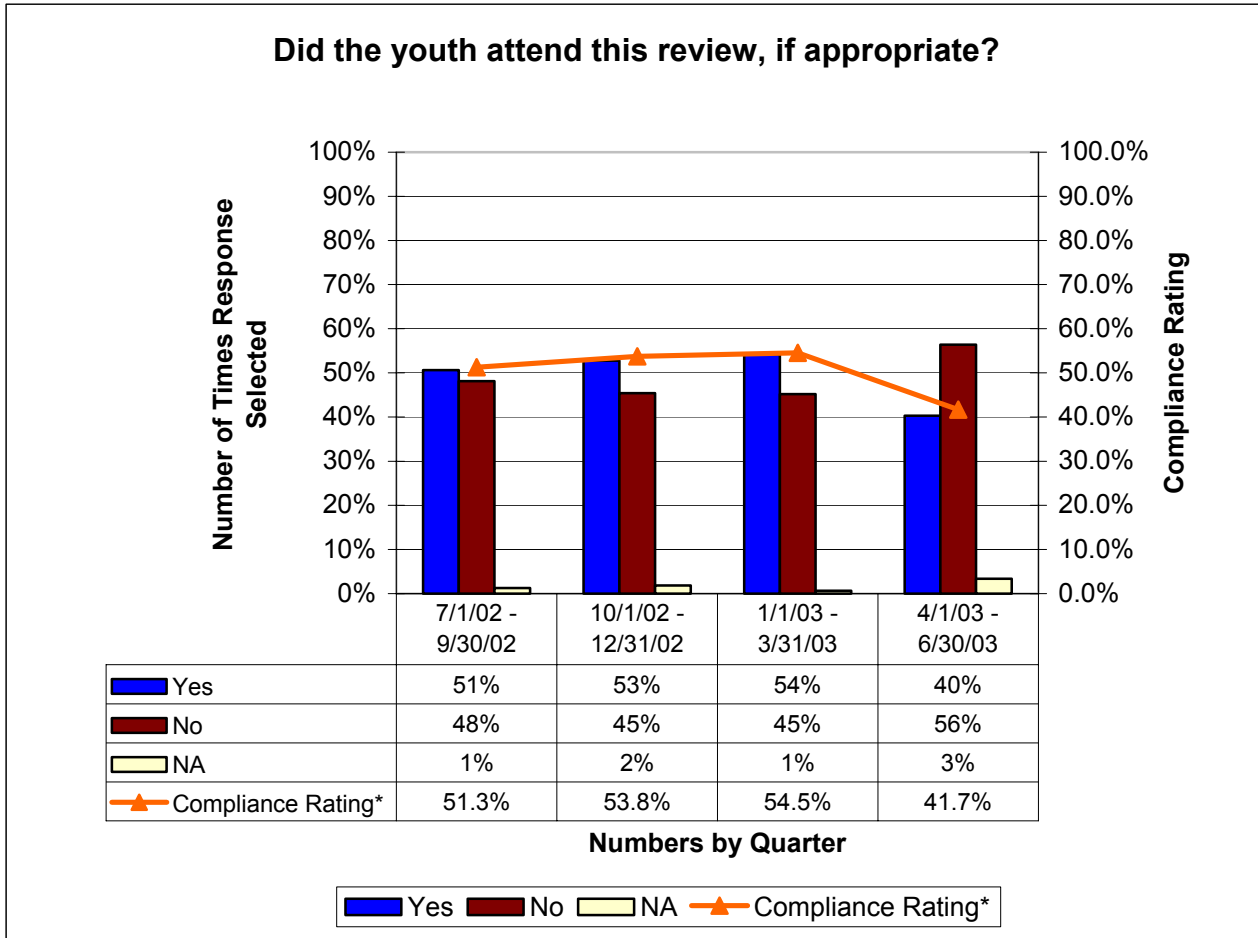


* Compliance Rating = (Y/(Y+N))

Review Attendance of the Youth

Unlike the mothers and fathers, the attendance of youth at the review was almost always applicable. In fact, looking at Chart 23 shows that only 1% to 3% of the time was it not applicable for the youth to be in attendance. Unfortunately, actual attendance only occurred for approximately half of the youth. While 51% of the youth attended the review of their case in the first quarter, it improved to 53% in the second quarter and climbed to a slightly higher 54% in the third quarter. It was discouraging to note, then, that attendance fell to 40% of the applicable youth in the fourth quarter, for the lowest compliance rating of the state fiscal year at 41.7%.

Chart 23: Review attendance of youth



* Compliance Rating = (Y/(Y+N))

Overall then, attendance appeared to be poor for the mothers, fathers, and even the youth. There were a few trends in the data that bear further elaboration here. First, for the mothers and fathers, attendance appeared to fluctuate over the quarters in a decrease, increase, decrease pattern. Thus, while the Administrative Review Division and Department of Youth Corrections should look to increase attendance in all quarters, it would appear that efforts targeted at reviews held during the second and fourth quarter in particular would be important. A large part of this might include speaking with Department of Youth Corrections reviewers and administrative review coordinators gain a qualitative understanding of why this pattern may be occurring, and then targeting any changes accordingly. Another critical, and particularly disheartening finding was that, while attendance by youth had been slowly but steadily increasing throughout the year, the fourth quarter showed a sharp decline of 12.8%. It might prove critical to look at performance in these areas again for State Fiscal Year 2003-2004 in order to determine if the decline continued, performance remained stable but low, or if attendance was increased.

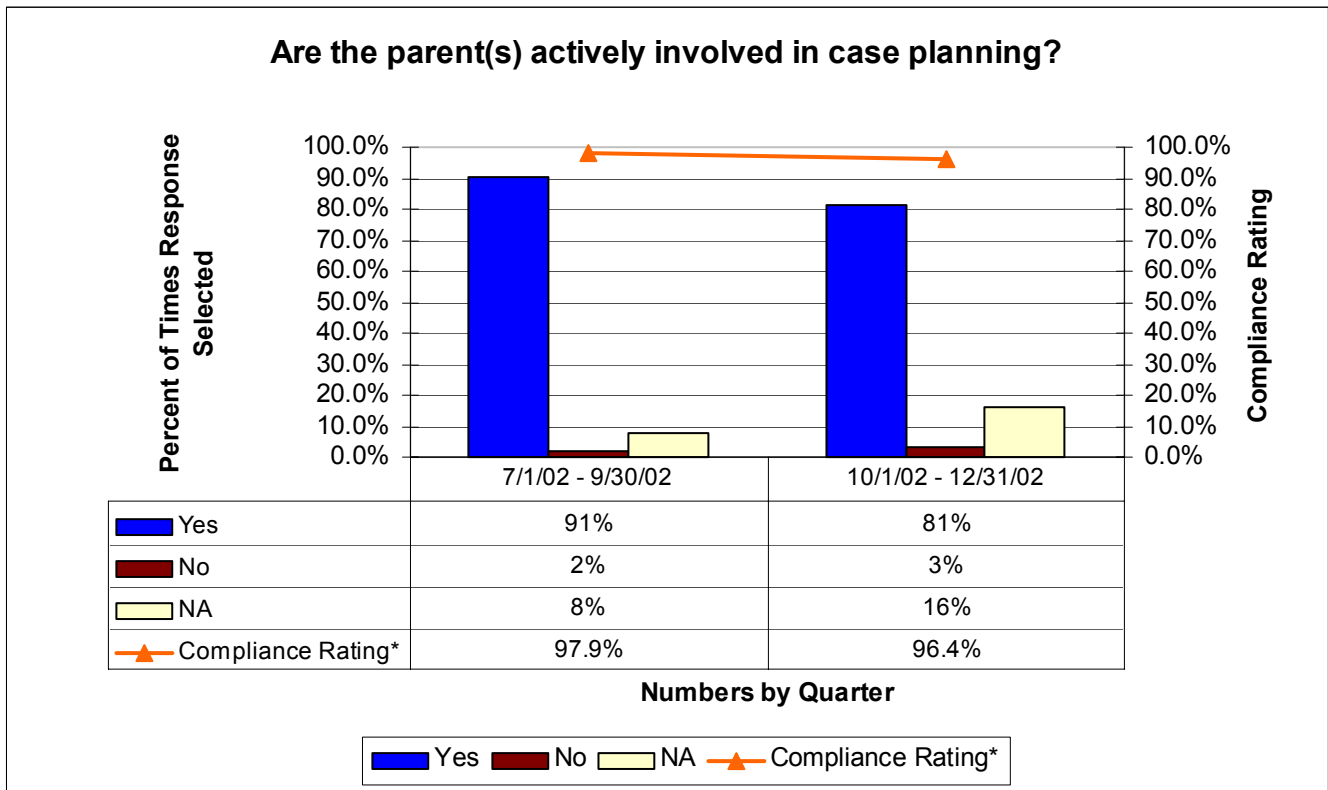
Involvement in Case Planning

As measures of involvement in case planning, administrative reviewers look at the case file for two key components. The first is documentation that indicates that the parent(s), when appropriate, were involved in the planning.

Parents Involvement in Case Planning

Like several of the other questions discussed so far, for the first two quarters this data was gathered through one question that looked at both parents. Chart 24 below shows that compliance for those two quarters, ranging from 97.9% in the first quarter down to 96.4% during the second quarter. Part of the reason for such high compliance may have been due to the fact that both parents were considered for when determining the answer to this question. Therefore, it may be more important to consider performance for each parent individually.

Chart 24: Parents involvement in case planning.

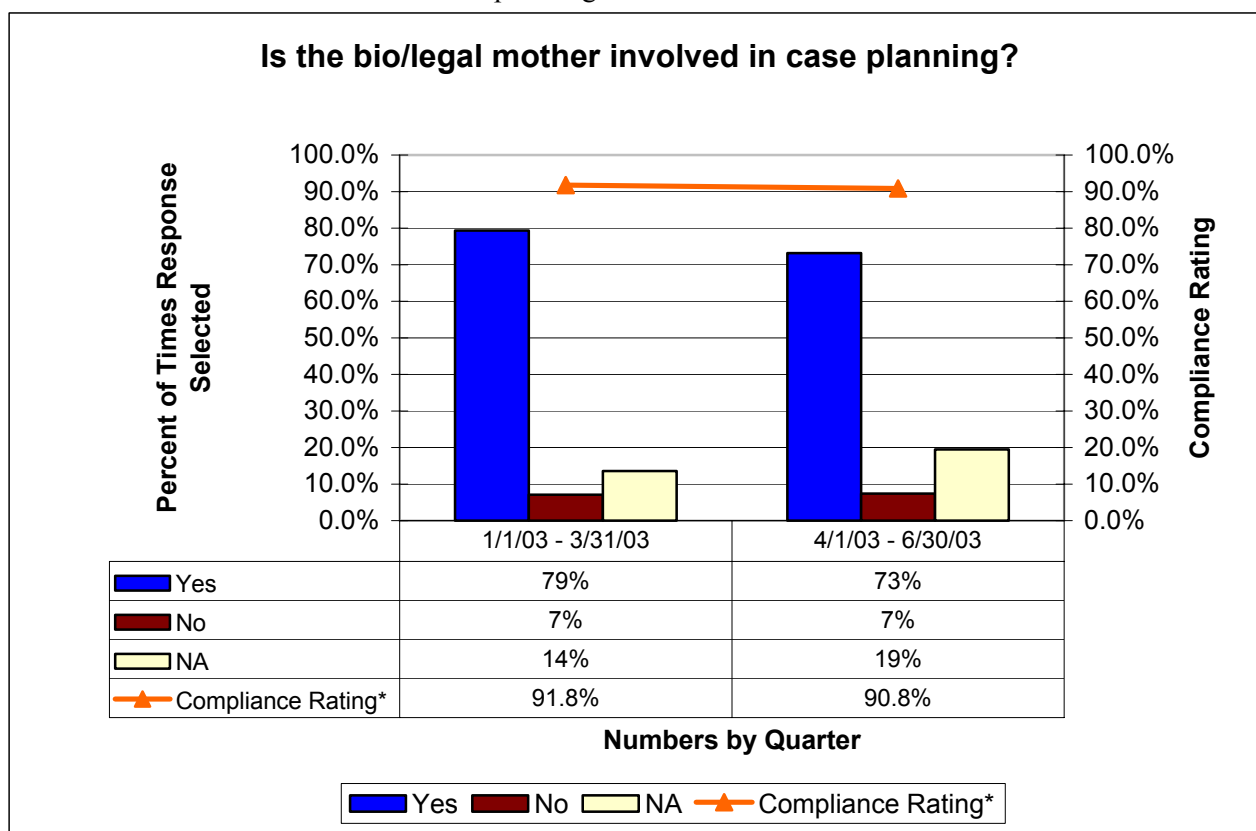


* Compliance Rating = (Y/(Y+N))

Mother's Involvement in Case Planning

During the last two quarters of the State Fiscal Year, reviewers looked for the involvement of both parents separately. Analyzing the data from the mother's shows several interesting facts. First, this question was applicable for most of the mothers, 86% of the cases in the third quarter and 81% of the cases in the fourth quarter. Secondly, compliance was still quite high, with a rating of 91.8% for the third quarter and 90.8% for the fourth. An interesting trend in the data also showed that, across these time spans, involvement of mothers in the cases was not applicable in a higher percentage of cases and, when it was applicable, a small percentage of the mothers were being involved in the fourth quarter as compared to the third. This is an interesting trend and should continue to be watched over the next year as more data is collected.

Chart 25: Mother's involvement in case planning

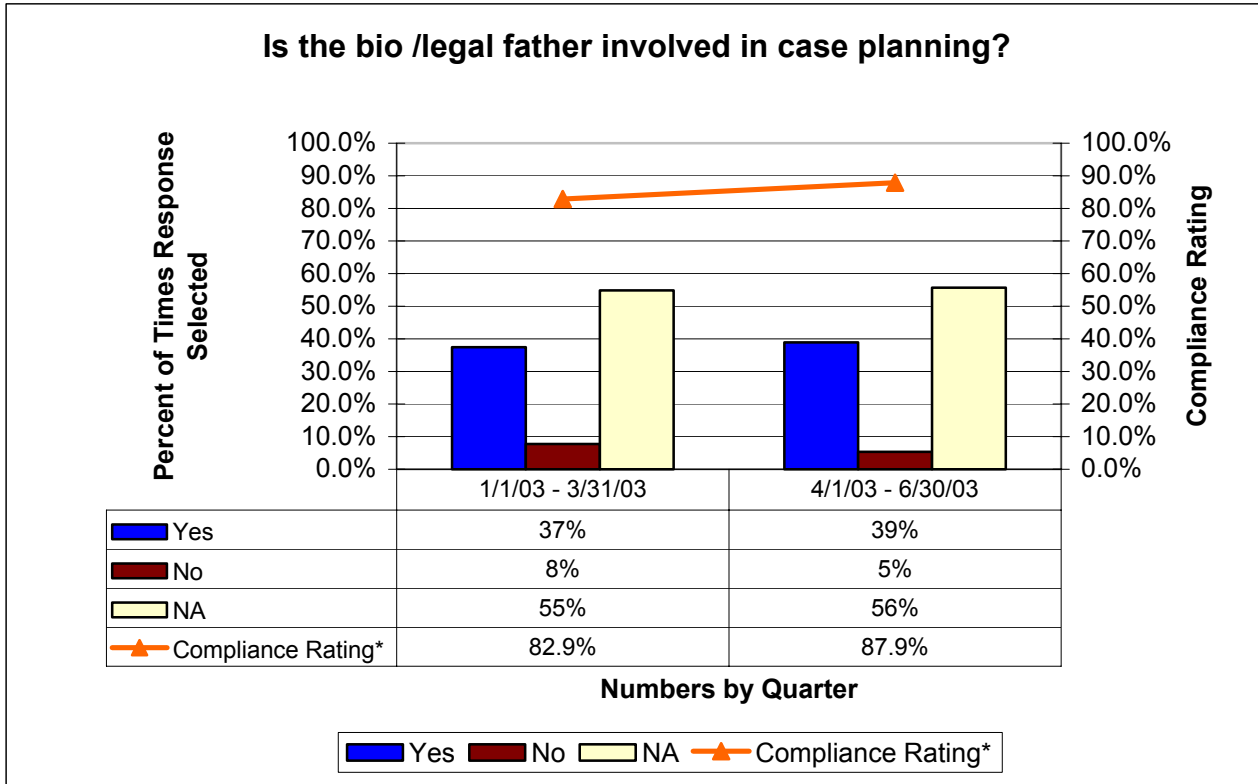


* Compliance Rating = (Y/(Y+N))

Father’s Involvement in Case Planning

Similar to the involvement of mothers, reviewers collected data regarding the frequency with which fathers were being involved in case planning. However, as compared to mothers, some differences arise when looking at the data for fathers. For example, while only a small percentage of cases were listed as Not Applicable for mothers, this answer was the most frequently selected for fathers. Specifically, 55% and 56% of the time reviewers said that this question was Not Applicable for the third and fourth quarters respectively. Therefore, while mothers were almost always applicable for involvement, fewer than half of the fathers were. In addition, for those fathers where case involvement was applicable, compliance ratings ranged from 82.9% in the third quarter to 87.9% in the fourth. Thus, while compliance for fathers was less than mothers, one positive trend important to note is that while performance declined for mothers, it actually improved 5% for fathers. This is one positive trend that may be a result of asking the questions separately and focusing more attention on the involvement of fathers. An additional step that may be necessary would be to investigate why such involvement of fathers is deemed as Not Applicable for such a high percentage of cases to determine the cause, and any possible remedies, for this finding.

Chart 26: Involvement of fathers in case planning.

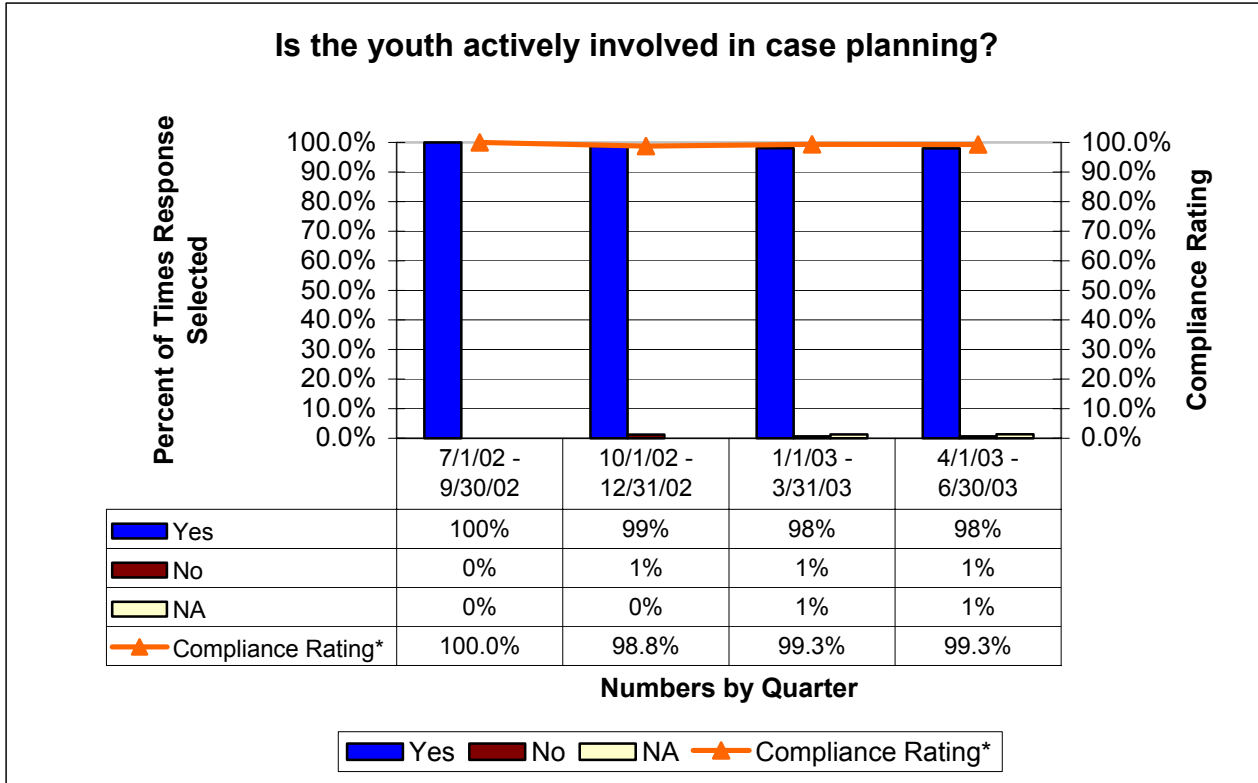


* Compliance Rating = (Y/(Y+N))

Involvement of Youth in Case Planning

As Chart 27 shows, the Department of Youth Corrections ability to involve youth in their case planning was extremely high. Not only was the question applicable to nearly every youth, the results show that the Department of Youth Corrections was able to involve almost 100% of the youth in their case planning. It was also encouraging to note that performance on this item remained equally high across the entire year.

Chart 27: Youth’s involvement in case planning.



* Compliance Rating = (Y/(Y+N))

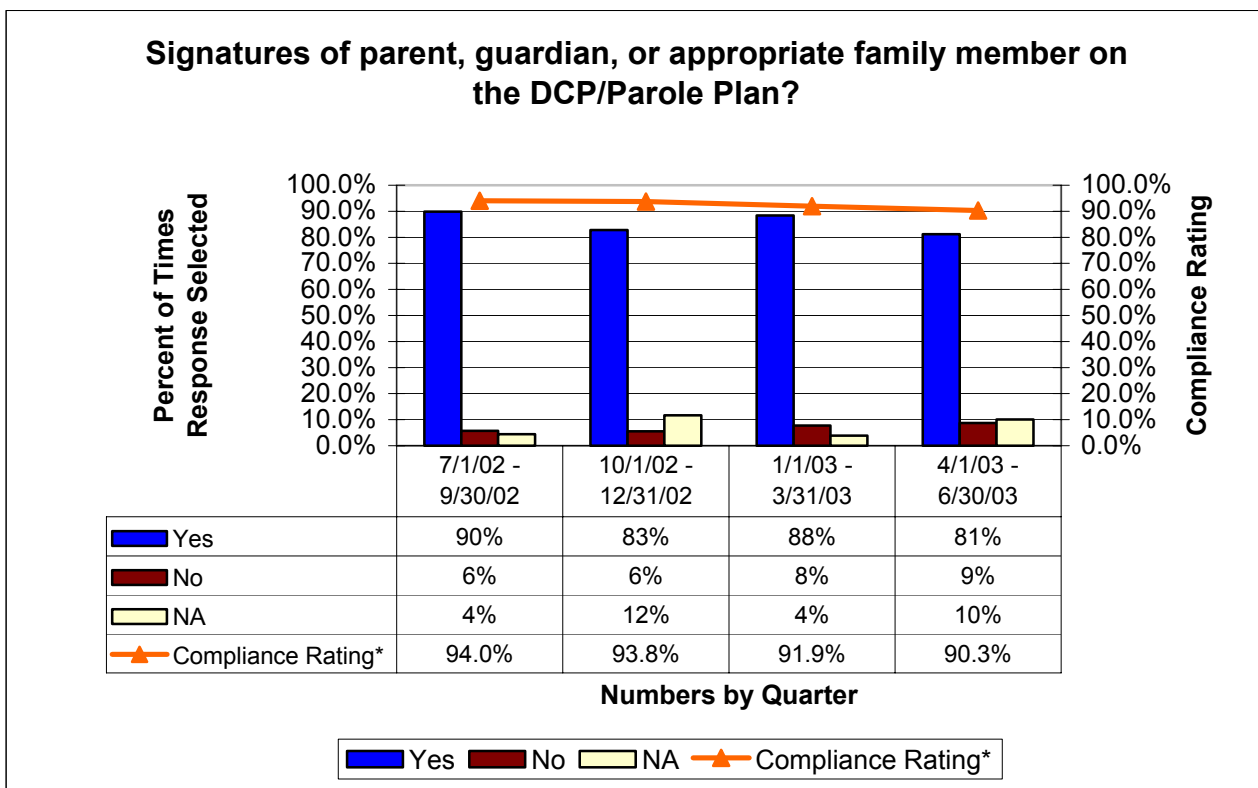
Signatures

As one indication of involvement in the development of the case plan, reviewers looked to ensure that all appropriate individuals signed the DCP or Parole Plan. The following section discusses the appearance of signatures for the parent and youth.

Signature of Parent

Chart 28 shows that, in general, the DCP/Parole Plan was found to have a signature from a parent, guardian, or an appropriate family member. For example, in instances where a signature should be found (which ranged from 88% to 96% of the time), reviewers found one in anywhere from 90.3% to 94% of the time. It is interesting to note that, once again, there was a slight decline in performance over the course of the year. Specifically, performance fell 3.7% within the state fiscal year.

Chart 28: Signature of the parent.

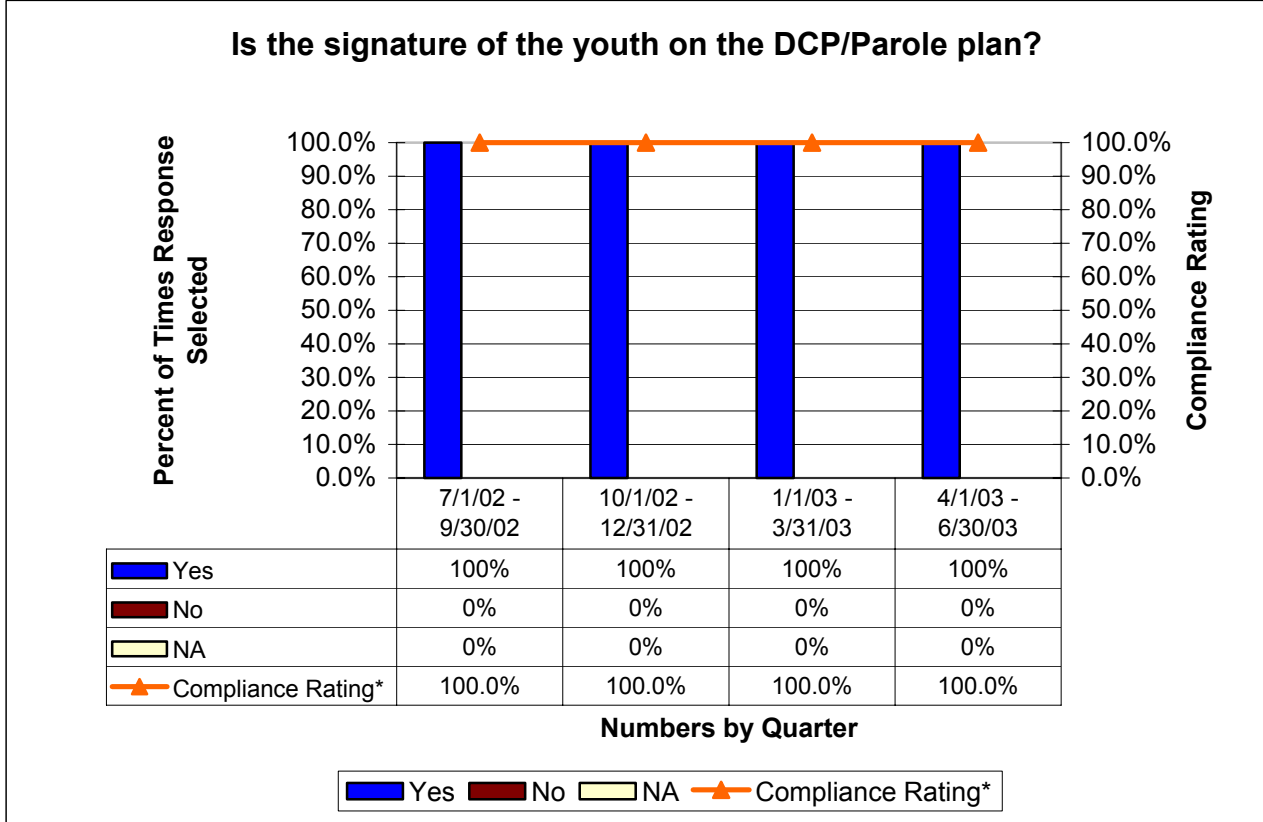


* Compliance Rating = (Y/(Y+N))

Signature of Youth

Not only was it always appropriate to have the signature of the youth on the DCP/Parole Plan, but reviewers indicated that one was always present. As Chart 29 shows, this resulted in a perfect 100% compliance across the entire year.

Chart 29: Signature of the youth.



* Compliance Rating = (Y/(Y+N))

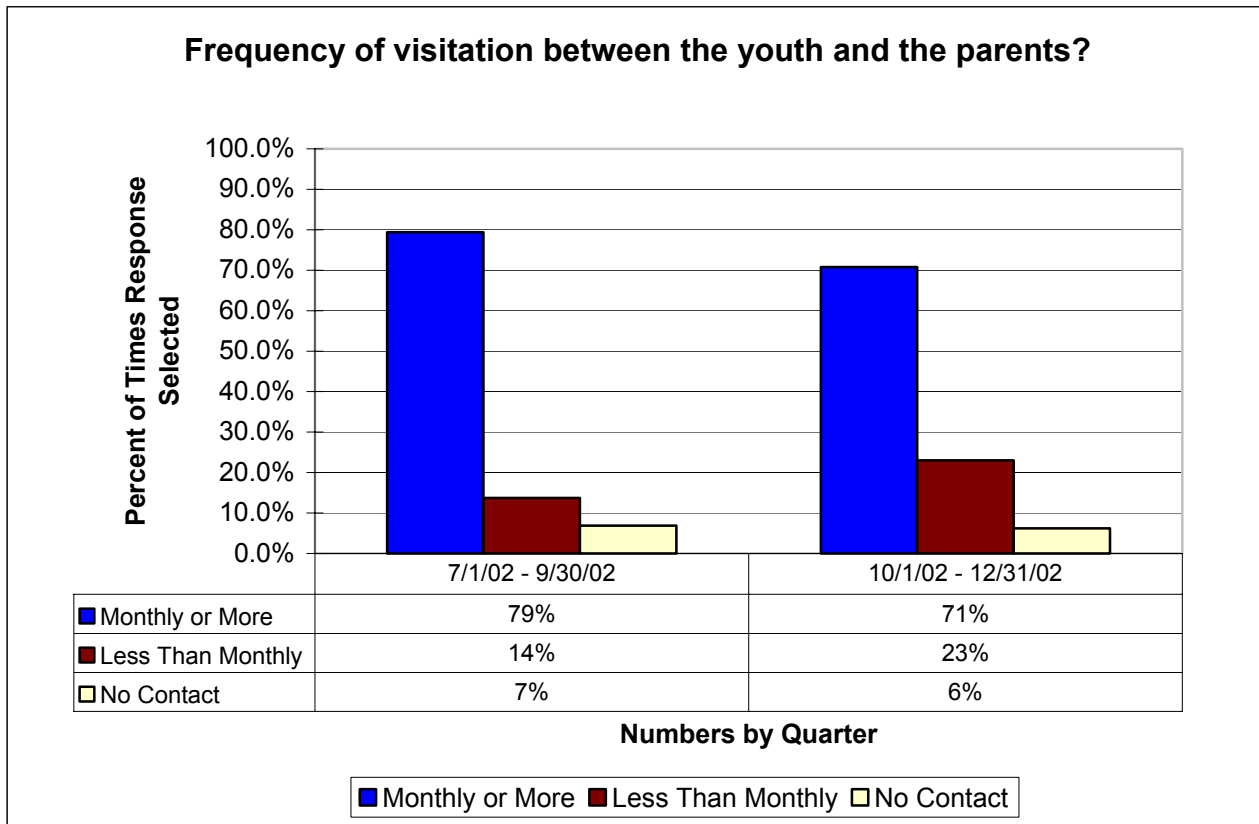
Visitation

Frequent visitation between a youth and their parent(s) is a critical aspect to maintaining permanency and/or a lifelong bond with the family of origin. As such, and similar to in the county child welfare cases, administrative reviewers for the Department of Youth Corrections cases were asked to indicate the frequency with which visitation was occurring. Here, data was gathered using a combined question for the first two quarters of the fiscal year, and then collected separately for the mother and the father during the last two quarters. It should be noted that there is no compliance rating for these questions, as there is no specific rule describing how frequent visitation should occur. Instead, frequency of visitation should be based upon case specific factors, such as the permanency goal.

Visitation between Youth and Parent(s)

Chart 30 shows that, overall, most of the youth were having monthly visitation with their parents. Specifically, 79% of the children in the first quarter, and 71% in the second quarter, were having visitation at least once per month. In addition, only approximately 7% of the youth were not having visitation at all. This means that the rest of the children were having visitation less than monthly. While the overall percent of children having visitation with their parent(s) remained relatively stable across the first two quarters, it is interesting to note that, in the second quarter, a lower percentage were having monthly visitation. Instead, there was an almost 8% decline in the monthly visitation group, with this percentage apparently moving to the less than monthly frequency group.

Chart 30: Frequency of visitation between youth and parents.

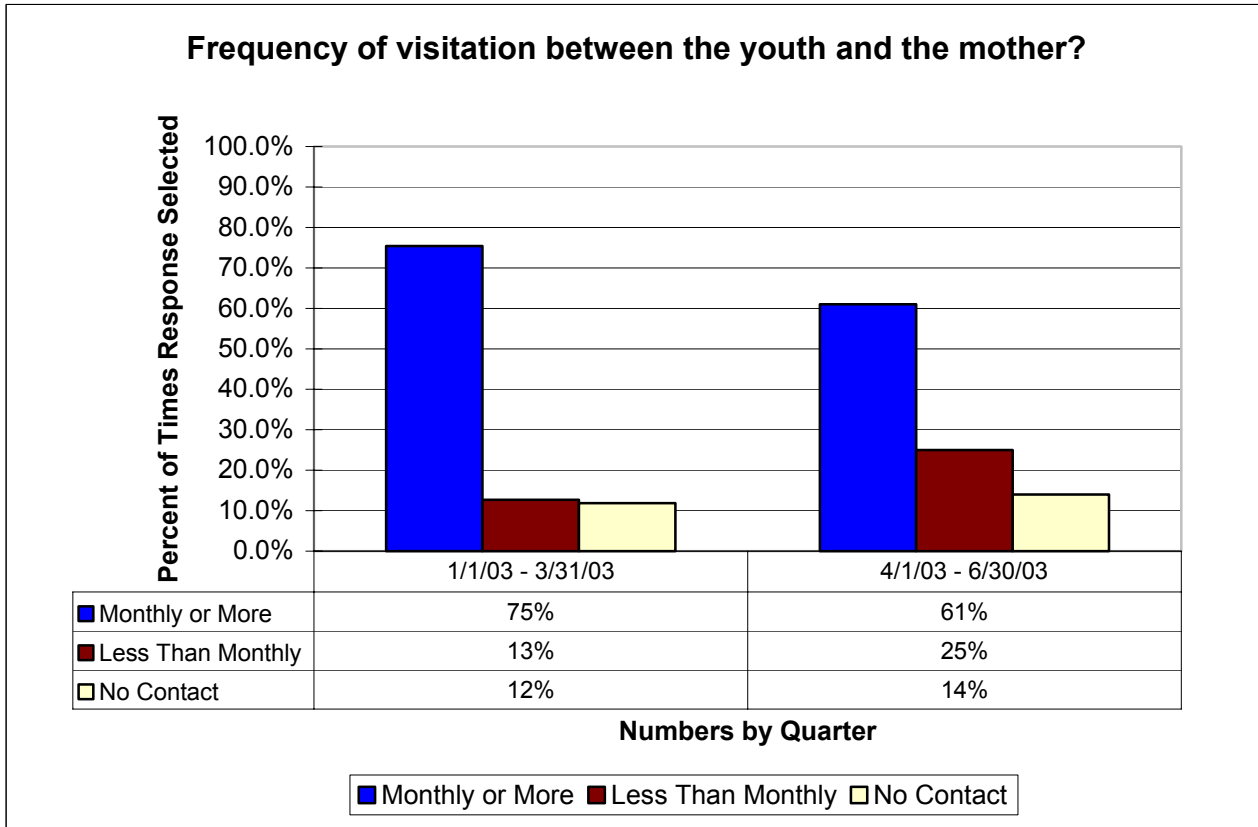


* Compliance Rating = $(Y/(Y+N))$

Visitation between Youth and Mother

Even after splitting the visitation out to specifically look at the mother, the percentage of children having no contact remained low. For example, during the last two quarters only 12% to 14% of the children had no contact with their mother. A high percentage of the children were having visitation that occurred at least once per month. Unfortunately, this percentage declined from 75% in the third quarter to 61% in the fourth quarter. While most of the decline was explained by a shift to a pattern of visitation that was occurring less than monthly (12%), a small percentage (2%) moved to the no contact group.

Chart 31: Frequency of visitation between the youth and mother.

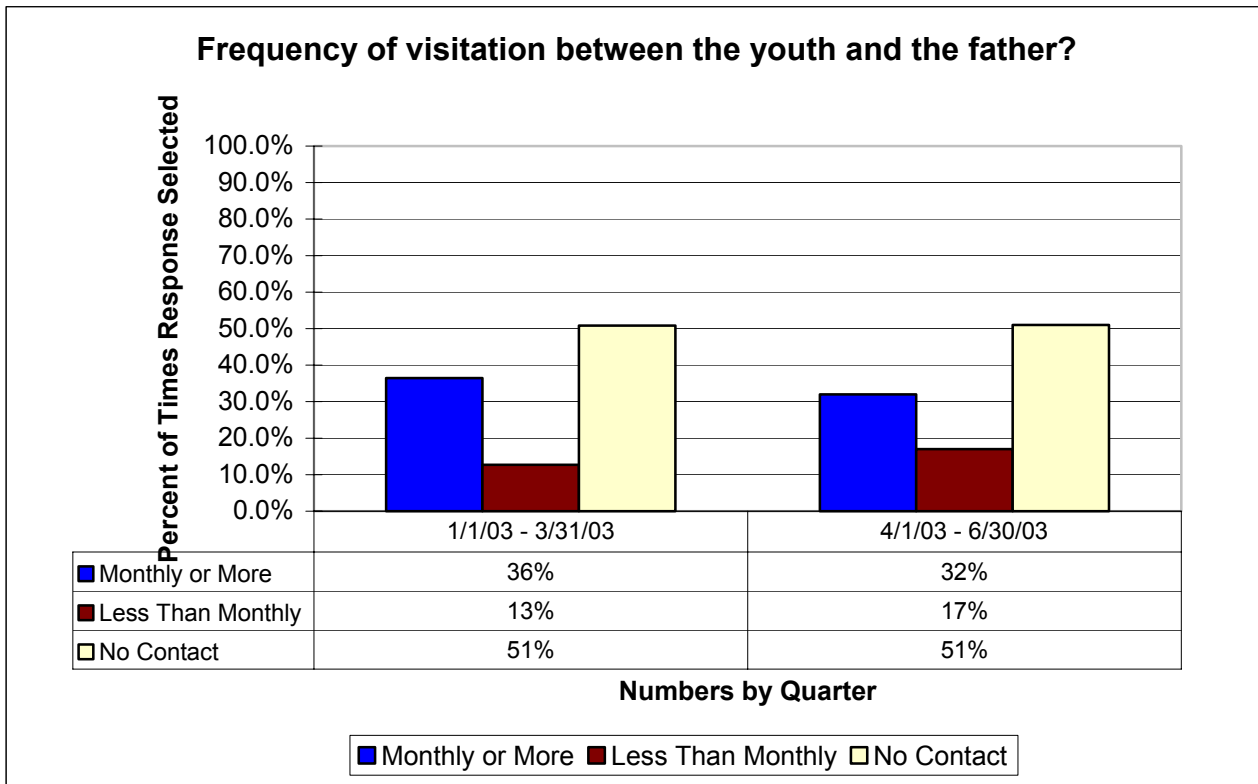


* Compliance Rating = (Y/(Y+N))

Visitation between Youth and Father

A quick look at Chart 32 shows an interesting finding when data about visitations were separated out for the mother and father. Suddenly, with regard to fathers, a high percentage of the children were not having contact with their fathers. This corresponds directly with the feedback included in the results of Colorado’s Child and Family Services Review, where federal reviewers indicated that Colorado frequently did not include the father in the case. Part of this feedback included increasing the due diligence effort put forth in locating fathers, as well as focusing on both parents, and not stopping with the involvement of the mother. Based on the high percentage of no contact responses to the visitation question, this feedback seems warranted. In addition, there was once again a decline in the percentage of youth having visitation at least monthly with their father, falling from 36% in the third quarter to 31% in the fourth quarter.

Chart 32: Frequency of visitation between the youth and father.



* Compliance Rating = (Y/(Y+N))

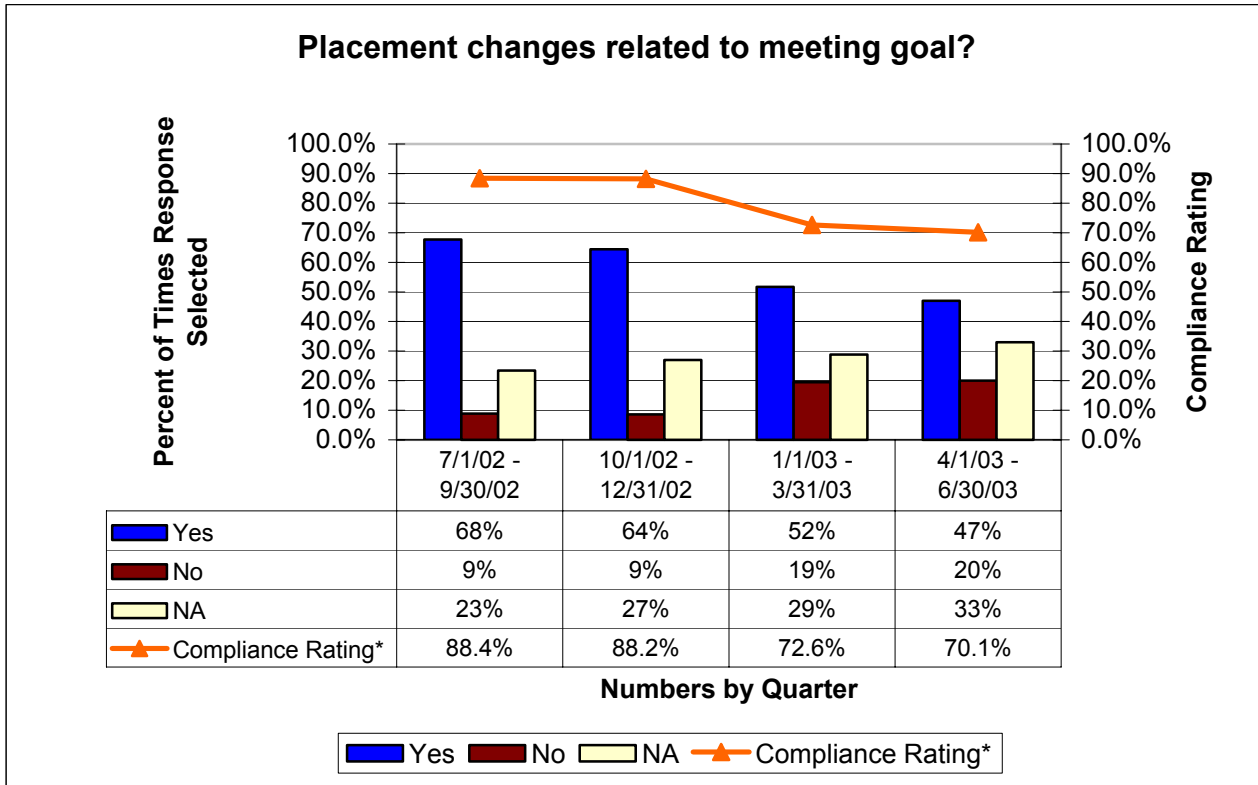
Placement Changes

In attempting to provide consistency for youth, in general changes in a child's placement should only occur when it is directly related to meeting their needs. An example of this would be a move to a more or less restrictive setting based upon the child's behavior and/or compliance with treatment. [Example of move that wouldn't count?]. Prior to discussing the results for this item, it is important to consider that a positive response for this question would be either a "Yes" or a "Not Applicable". This is because Not Applicable means that the youth did not experience a placement change during the six months under review. Therefore, while the compliance rating is still calculated using the traditional $Y/(Y+N)$ method (in other words, for those children who experienced a move, was the move directly related to meeting the permanency goal?), another way of considering performance would be to combine the Yes and Not Applicable results. Both methods will be discussed briefly.

When removing the Not Applicable findings, and using the traditional method of calculating compliance, performance was moderate overall. For instance, the compliance ratings ranged from a high of 88.4% in the first quarter to a low of 70.1% during the fourth quarter. Inherent in this range, then, is the finding once again of a decline in performance over the course of the year. In particular, after remaining stable for the first two quarters, it then experienced a sharp decline 15.6% between the second and third quarter, and then another 2.5% decline by the fourth quarter. This will be discussed further after looking at the data including the Not Applicable responses, as a particular trend becomes more apparent in doing so.

When taking the Not Applicable responses into consideration by including them with the Yes responses as a positive finding, the overall rate of performance increases. Adding these two together shows a range from a high of 90% in the first quarter to a low of 80% in the fourth quarter. Here again, the performance declined over the course of the year. The interesting aspect comes in looking at the percentage of Not Applicable responses. These actually increase over the course of the year, indicating that a lower percentage of the youth are experiencing moves overall. However, in order to experience a decline in the compliance rating, then, this means that, for those children who are experiencing a move, more of them are experiencing placement changes for reasons *not* related to achieving their permanency goal. For example, the percentage of children who were moved for a reason not related to achieving their goal was at 9% for the first two quarters, and then it jumped to approximately 20% for the last two quarters.

Chart 33: Placement changes related to achieving permanency goal.



* Compliance Rating = (Y/(Y+N))

Summary

Over the course of SFY 2002 – 2003, the Administrative Review Division conducted 12,652 reviews. Through this effort, the Administrative Review Division was able to identify and provide state and county child welfare agencies with case specific and aggregate data on how well they were meeting the needs of the children and families of the State of Colorado. Overall, this process revealed several areas of strength in Colorado's child welfare system. For example, the involvement of children in creating their case plan, and minimizing placement changes to those that are directly related to achieving the permanency goal of the child (e.g., moving to a less restrictive placement). In the Department of Youth Corrections contact with between staff and the children was high, as was the involvement of the child in the creation of their treatment plan. However, there were also several areas where the child welfare system needed to improve. Involvement of parents (particularly fathers) in case planning was lower than would be hoped, frequency of visitation between the child and parents was low, and children and parent attendance at Administrative Reviews themselves was low. As the State of Colorado completed the Child and Family Services Review and entered into a Program Improvement Plan with the federal office during 2003, the next year will mark an increased focus on improving safety, permanency, and child and family well being that should result in continued improvement across the areas monitored by the Administrative Review Division.

Appendix A: Historical Review Number

Chart 31: Review per month for SFY 2001-2002.

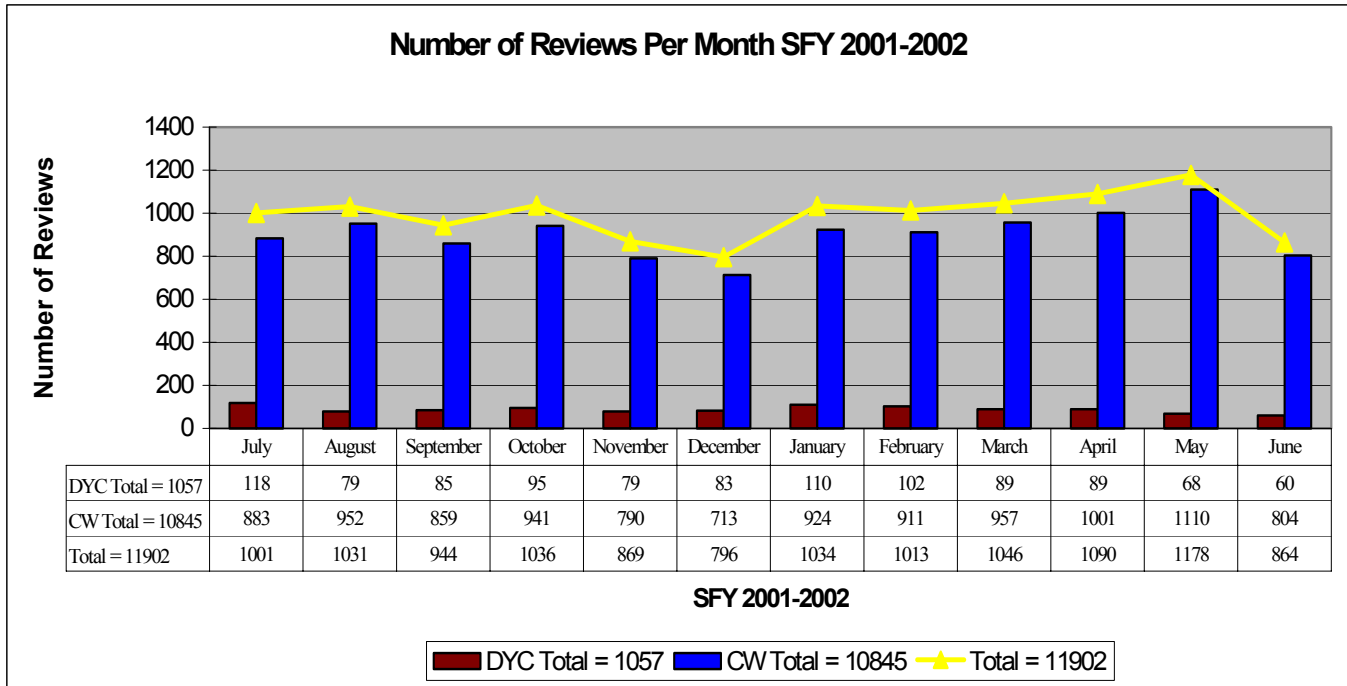


Chart 32: Total reviews and FTE over history of ARD

