

October 22, 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.

The Kansas Department for Children and Families (DCF) appreciates the below recommendations. The agency fully understands the time, effort and work that was put behind each recommendation. Although, the agency has a stance that the below recommendations will either not improve the child welfare system, or this is not the correct forum to address these recommendations. As previously mentioned, DCF believes that any statutory changes to the Child in Need of Care (CINC) code should be taken before the Judicial Council to be fully vetted. Again, thank you for commitment to Kansas children and families.

- **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:** *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*
- **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:** *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*
- **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. *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*
- **A4.4** The Office of the Child Advocate shall fulfill the role of ombudspersons for current and former recipients of services. **Response:** *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*
- **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:** *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*

- **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. *DCF opposes the Office of the Child Advocate because it is duplicative and lacks accountability and authority.*
- **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.*
- **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.*
- **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.*
- **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.*
- **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.

- **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.*
- 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 process. The Child Welfare system has multiple outcomes, both State and federal, that it must meet. In addition, the recommendation requires an annual ongoing audit that would involve multiple contractors as well as within the agency that would require an exceptional amount of staff time and financial resources.*
- **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 can request an audit of DCF at any time through the Legislative Post Audit.*
- **B1.1** 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:** *Statute already outlines when joint outlines are required. There are more than 400 law enforcement agencies in the state. This recommendation would overburden the KPRC.*

- **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. Moving forward, one of our goals is to strengthen this program.*
- **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 mediation or facilitation. **Response:** *Case plans already require a third party. This recommendation is duplicative.*
- **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:** *The agency believes this recommendation is similar to Family Group Decision Making and is duplicative.*
- **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. This recommendation sets an arbitrary requirement that creates a barrier, which will result in delayed permanency. Additionally, DCF just received a federal grant to develop a kinship navigator program.*