

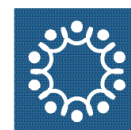
DECEMBER 16, 2019



PERFORMANCE OF CORRECTIVE
ACTIONS OF THE JUDGMENT IN

THE PEOPLE OF THE STATE OF CALIFORNIA v.
HUMBOLDT COUNTY DEPARTMENT OF HEALTH
AND HUMAN SERVICES AND HUMBOLDT
COUNTY SHERIFF'S OFFICE

PROGRESS REPORT
(MARCH 1 - AUGUST 31, 2019)



**Center for the
Study of
Social Policy**
Ideas into Action

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Washington, DC 20005
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People of the State of California
v.
Humboldt County’s Department of Health and Human Services
and Humboldt County Sheriff’s Office

Progress Report
(March 1 - August 31, 2019)

TABLE OF CONTENTS

I.	Background and Introduction	1
II.	Monitoring Activities	2
III.	Summary of Performance.....	3
IV.	Performance on Corrective Actions	7
	A. Tribal Collaboration	7
	B. Community Task Force and Inter-Agency Coordination	10
	C. HCSO Training and CWS-NCCD Training and Technical Assistance Contract ..	12
	D. Implementing a New Emergency Response System.....	16
	E. Revision of Policies and Procedures	20
	F. Complaint System	20
V.	Recommendations	22
VI.	Summary of Performance on Corrective Actions.....	26
VII.	Appendices	58
	Appendix I: Glossary of Acronyms	58

LIST OF FIGURES

Figure 1: American Indian Children Involved with Humboldt County CWS (August 31, 2019)8

Figure 2: Total and Percentage of Suspected Child Abuse and/or Neglect Reports Received by Humboldt County CWS from Mandated Reporters (September 1, 2018 – August 31, 2019)10

Figure 3: CWS Investigations Backlog (July 13, 2018 – August 31, 2019).....15

Figure 4: CWS Reports Received, Evaluated Out, and Assigned for Investigation (March – August 2019).....17

Figure 5: Response Times for CWS Investigations (March – August 2019).....18

Figure 6: CWS Ombudsperson Complainant Affiliation (March – August 2019)21

LIST OF TABLES

Table 1: CWS Cross Reports to Local Law Enforcement (March – August 2019)19
Table 2: Summary of Performance on Corrective Actions Required By Judgment26

I. Background and Introduction

This is a report on the progress of Humboldt County's Department of Health & Human Services (DHHS) and Sheriff's Office (HCSO) in completing agreed upon corrective actions to meet the terms of a Judgment of the Superior Court of the State of California (Judgment) entered by the California Attorney General (CA AG) on behalf of the People.^{1,2,3} The Judgment, dated February 13, 2018, includes a Memorandum of Understanding (MOU, Exhibit A) between DHHS and HCSO.

The Judgment required that DHHS and HCSO contract with a third-party compliance monitor.⁴ The county contracted with the Center for the Study of Social Policy (CSSP) to serve as the third-party compliance monitor.⁵ Parties agreed that the monitor shall conduct a review of implementation of requirements of the Judgment and prepare a written report bi-annually.

Section II of this report describes CSSP's activities during this third bi-annual monitoring period, concluding eighteen months of work to assess CWS' and HCSO's actions to meet the terms of the Judgment. Specific findings are included in three sections: Section III, an overall summary of DHHS, CWS, and HCSO performance in completing corrective actions of the Judgment; Section IV, Performance on Corrective Actions, organized by substantive areas of the Judgment; Section V, Recommendations for improvement; and Section VI, a Summary of Performance on each corrective action during monitoring periods one to three (March through August 2018; September 2018 through February 2019; and March through August 2019). Gayle Samuels and Judith Meltzer prepared this report, with support from Arthur Argomaniz, E Feinman, and Rachel Paletta for presentation to Parties and the public.

¹ This is the third progress report. Additional reports may be found at: <https://cssp.org/our-work/project/child-welfare-reform-through-class-action-litigation>

² In 2015, after receiving complaints that DHHS' Child Welfare Services (CWS) and HCSO were not always properly receiving, responding to, and investigating reports of child abuse and neglect, the CA AG conducted an investigation to determine whether CWS and HCSO were complying with CA's Child Abuse and Neglect Reporting Act (CANRA) Cal. Penal Code § 11164 et seq. and related provisions of the Welfare & Institutions Code.

³ A copy of the stipulation by Parties and the Judgment including Exhibit A, an MOU between HCSO and CWS, may be found at: <https://oag.ca.gov/news/press-releases/attorney-general-becerra-humboldt-county-agrees-system-wide-reforms-protect>

⁴ Judgment, Section 4.

⁵ CSSP works nationally on federal, state, and county policy as well as on community, systems, and program levels to improve conditions for families and children with a focus on equity. CSSP brings decades of experience working with federal, state, and local partners, parents, and youth to improve experiences with and outcomes of multiple systems, including child welfare systems. CSSP has also served as monitor and technical assistance provider to several state and county child welfare systems involved in federal class action cases. CSSP's approach to monitoring child welfare systems engaged in reforms, such as those required by this Judgment, includes seeking input from system leadership and staff, community partners, consultants engaged in supporting the reform, tribal and community representatives, service providers, parents, and youth. More information can be found at: www.cssp.org

II. Monitoring Activities

During this monitoring period, CSSP:

- Maintained communication with the CA AG's Office on the status of the County's progress and CSSP's work.
- Communicated with leadership at DHHS, CWS, and HCSO; tribal representatives of six of the eight federally recognized tribes in Humboldt County, including, social services leadership, and/or staff of the Bear River Band of Rohnerville Rancheria (Bear River), Hoopa Valley Tribe, Karuk Tribe, Trinidad Rancheria, Wiyot Tribe, and Yurok Tribe; and Humboldt county legal counsel.
- Observed CWS' leadership meetings, National Council on Crime and Delinquency (NCCD) technical assistance sessions, and participated in meetings to prepare for, observe, and present at meetings of the Community Task Force required by the Judgment.^{6,7}
- Tracked the progress of the work on four significant deliverables of the Judgment: (1) work to create a Child Protection Reporting Guide (CPRG); (2) DHHS review and report on the functioning of the CWS Ombudsperson's Office; (3) meeting between DHHS, CWS, county counsel, tribal consultant, and Yurok Tribe to develop an MOU/protocol; and (4) steps to initiate a CWS workload study.^{8,9}
- Spoke with 18 CWS social workers and supervisors, individually and in groups of up to four, regarding their impressions and the impacts of reform efforts.
- Released the second monitoring report to the public and presented aspects of the report at a Humboldt County Community Task Force meeting.
- Reviewed individual case complaints, as requested by the CA AG's Office.
- Analyzed data provided by DHHS, CWS, and HCSO.

CSSP also received an orientation to HCSO's updated records management system (RMS) which assists HCSO in tracking reports of child abuse and neglect or (referring to the Reporting Act)

⁶ National Council on Crime and Delinquency, NCCD: <https://www.nccdglobal.org>

⁷ Judgment, Sections BB., CC., & II.

⁸ Judgment Section KK. (1); web-based mandated reporter guide.

⁹ Judgment Section CC (3).

CANRA reports; reviewed electronic case records in CWS/Case Management System (CMS); and accessed CWS data in SafeMeasures®.^{10,11}

III. Summary of Performance

During this monitoring period, HCSO, DHHS, and CWS maintained many of the procedural requirements of the Judgment that were previously met. HCSO and CWS maintain cross reporting practices, sending reports to each other and other law enforcement agencies, as required by CANRA and the Judgment. CWS trained staff, as required, and implemented a training program for new staff. To begin to address staffing constraints, CWS hired 22 additional social workers beginning June 2019 and have implemented a plan to hire quarterly cohorts.¹² Social workers in Adoptions; Emergency Response and Resource Family Approval; and Ongoing Service and Placement are expected to complete probation and assume a full case or workload in December, January, and February respectively. To address the backlog of investigations, CWS created a dedicated unit and the number of investigations open for 40 or more days has reduced significantly.¹³ On December 11, 2019, CWS reported there were 11 investigations in backlog status.

CWS also maintained good faith efforts to develop protocols with tribes; both DHHS and CWS continue to state their commitment to build ICWA programming; and DHHS and the Hoopa Valley tribe are making progress with support from the Humboldt County Board of Supervisors and the Tribal Council on efforts to renovate and have space in Hoopa Valley for co-location of tribal and CWS staff.

At the same time, County leadership, CWS management, the Ombudsperson's Office, and CSSP are fielding complaints from tribes about significant lapses in shared decision making and implementation of legal and policy requirements. Tribal social services staff remain frustrated at the lack of consistent implementation of policies and procedures around collaboration. CWS management and leadership appear to respond to ongoing missteps on a case-by-case basis and to date have failed to develop internal capacity to assess overall practice in accordance with policy expectations and to systematically understand whether and how individual complaints reflect overall practices and outcomes.

¹⁰ CWS/CMS is a California statewide electronic case management tool.

¹¹ SafeMeasures® is an NCCD business intelligence tool, adopted statewide, that uses case management data, uploaded nightly, to provide agency directors, managers, supervisors, or social workers with case-based outcomes on key performance indicators. Multiple levels of staff can monitor their own work, the work of multiple social workers who form a unit and are led by one supervisor, the work of the entire county's, and statewide performance. Social workers can prioritize work, identify problems, make sure data reflects work done and progress made, and plan for improvement.

¹² A total of 22 social workers were hired from June 3, 2019 to September 23, 2019, with a cohort of 17 beginning on August 26, 2019.

¹³ Upon agreement with CWS and NCCD, a CWS investigation open for more than 40 days after a report to the hotline is considered in backlog status.

In CSSP’s view, CWS must develop and implement a capacity to track and report on policy implementation and case practice to identify both areas of strength and deficiencies so that they can make timely fixes to assure systems are functioning well for all children, youth, and families, including children with tribal affiliation.

New HCSO Leadership

HCSO long-time Deputy, Dennis Young, who oversaw the CANRA Coordinator’s position, was instrumental in the early changes made by HCSO in response to the Judgment, and a regular participant in the Community Task Force, retired in May 2019. HCSO filled the open Deputy position in June 2019. This transition has gone smoothly. The new Deputy has met with CWS and CSSP and has attended a Community Task Force meeting.

Changes in Key CWS Leadership Positions

On January 25, 2019, the Director of CWS, who had held the position since October 2017, resigned. The DHHS Director increased oversight of CWS pending the employment of a new CWS Director and two Deputy Directors assumed increased leadership roles in the interim. After a search process, DHHS hired a CWS Director, Amanda Winstead, as of June 3, 2019. The CWS Director position has thus been filled for half of this six-month monitoring period.

Since late 2018, the CWS Director has been supported by two Deputy Directors. Responsibilities of one Deputy Director include tracking and reporting on terms of the Judgment, staffing the Community Task Force, and implementing the required workload study and CPRG. This Director is also responsible for quality assurance and improvement functions including increasing the use of multiple forms of data and improving understanding of practice and systems functioning. CWS reports that due to work demands on fulfilling other requirements of the Judgment, the quality assurance functions have not yet been prioritized.

Another Deputy Director, in an “extra help” role, assists staff with accurately completing Structured Decision Making (SDM[®]) tools, supports the development of a training program, and provides mentorship and support to program managers and supervisors in managing programs and supervising staff. During this monitoring period there were shifts in CWS program management as a manager resigned, a manager shifted from one program to another, and a supervisor was promoted to a managerial position.¹⁴ From March to August 2019, CWS hired six new supervisors. One is a supervisor of Training; two are in Emergency Response; and three are assigned to Ongoing Services.

¹⁴ The CWS program manager responsible for Adoptions, Placement, and Resource Family Approval programs resigned as of mid-March 2019. The program manager responsible for Ongoing Programs (Family Maintenance/in-home services, Family Reunification, and Permanency Planning) assumed the Adoptions, Placement, and Resource Family Approval program manager role. DHHS promoted a CWS social worker supervisor to the program manager position responsible for Ongoing programs.

The multiple transitions have contributed to communication issues internally and externally. During these transition periods it has not always been clear to stakeholders who, beyond managers, is responsible for problem-solving on cases and addressing systemic issues.

*CWS has significantly reduced the backlog of investigations with the creation of a dedicated backlog unit.*¹⁵

In June 2019, CWS implemented a new unit of social workers and a supervisor to close backlogged investigations. As of August 31, 2019, there were 62 investigations open 40 days or more compared to mid-April 2019 when the backlog was over 200 investigations. As discussed in more detail later in the report, CWS also implemented a number of supervisory and tracking practices to focus on the backlog reduction.

CWS rolled out a comprehensive orientation program for new staff.

CWS began to implement a three-month orientation for cohorts of new staff expected to be hired on a quarterly basis. The orientation builds on Core Training provided by the Northern California Training Academy.¹⁶ Orientation topics include policies and procedures, ICWA and tribal sovereignty, receiving reports at the hotline, using Child Welfare Services' (electronic) Case Management System (CWS/CMS), SDM[®], SafeMeasures[®], and motivational interviewing.^{17,18} New staff also shadow current staff and participate in weekly group supervision with the CWS' training supervisor and cultural coaches.

CWS completed annual staff training; HCSO annual staff training not yet complete.

CWS reported that by August 31, 2019, all staff had participated in annual training on CANRA, California's Welfare and Institutions Codes, confidentiality, cross-reporting, and contact with tribes. HCSO was expected to have provided annual refresher training on CANRA, mandated reporter and confidentiality requirements, handling investigations relating to child abuse and neglect, the impact of trauma on children, and corrective actions of the Judgment for all deputies and records personnel by August 31, 2019. HCSO had not yet completed annual training but expected that all staff would be trained by mid-November 2019.

There are multiple significant complaints about CWS practices, decision making, and communication.

Although CWS has shared new and updated policies related to the Judgment with staff and also provided initial and refresher staff training on policies and procedures to staff, implementation is inconsistent. Complaints to CWS management, leadership, and the Ombudsperson Office, as well

¹⁵ Humboldt County CWS considers investigations open for 40 days or more after a report receipt of a report to be in backlog status.

¹⁶ The Northern California Training Academy provides training, research, evaluation, and consultation to 28 Northern California counties and two tribes; <https://humanservices.ucdavis.edu/programs/northern-california-training-academy>

¹⁷ <https://www.nccdglobal.org/assessment/sdm-structured-decision-making-systems/child-welfare>

¹⁸ <https://www.nccdglobal.org/analytics/safemeasures>

as direct reports by CWS staff to the Monitors indicate significant problems in policy implementation, decision making, and practices.

Some staff state they have not been trained or they are inadequately trained, and others have stated that some requirements are too onerous, especially partnering with tribes to conduct assessments and make decisions, due to high caseloads or workloads. CWS management and leadership are aware of these shortcomings but there seems to be little to no accountability to adhere to the state's and agency's policy and practice requirements.

The CWS Ombudsperson's Office and CSSP have fielded multiple complaints about CWS practices and decision making, related to the agency's work to reduce the backlog of investigations and policy violations, especially in working with tribes. The establishment of the backlog unit contributed to improved communication regarding pending investigations being handled by that unit, but problems continue in partnering with tribes, and with sharing and documenting information about other investigations.

CWS is not working on ensuring implementation of new policies, procedures, and practices.

While many of the corrective actions are about updating policies and procedures related to responding to reports or suspicions of child abuse and/or neglect, corrective actions also require CWS to *ensure* certain practices are being implemented (Judgment Sections C., E., R., S., and X.) and *create processes* to understand, sustain, and improve practices and system functions (Judgment Sections H., BB. (1) and CC. (2), (4) and (5)).

As presented below, structures are not yet in place to facilitate and assure that practice with children, families, and tribal representatives are consistent with CWS policy. CWS is not tracking practice to understand the extent to which reported problem cases are representative of overall practice deficiencies. While in any system there is always room for improvement, there is currently an unmet need for CWS managers to systematically assess practice against expectations so they are aware of and can be proactive in addressing areas for improved practice and systems.

CWS states that the demands of the Judgment requirements and staffing difficulties, including high caseloads and staff turnover, have impacted their ability to implement processes for addressing similar complaints across multiple cases. There is a need to implement reliable mechanisms for identifying and addressing systemic issues in a manner that informs all levels of frontline staff, management, leadership, stakeholders, and the community. Instead, concerns about hotline reports regarding tribal children being assessed without input from tribal social services, and from tribal social services that their staff have not been given enough notice to accompany CWS on an investigation are treated on a case-by-case basis. Systemic fixes and ongoing analyses are needed. The Monitor and CWS have also received complaints involving disagreement between social worker screeners and tribal social services staff in which tribal social services staff have assessed that a child is left in an unsafe situation. Communication gaps exist between the CWS investigating

and ongoing social workers when there is a new report on a case already known to the agency. Reliable processes are not in place to incorporate case history and address these situations in a timely and comprehensive manner.

CWS has not yet begun work to develop capacity to use data for management nor build durable continuous quality improvement processes.

NCCD's contract with CWS includes building capacity to use data for management, including reports that may be accessed from SafeMeasures[®] and other sources. NCCD has also encouraged and provided initial support to CWS in implementing case readings by supervisors and managers for fidelity to SDM[®] tools. However, this collaborative and internal quality improvement work has not gained momentum and has not resulted in consistent reviews at the supervisory level. Without a clearer understanding of the outcomes of work across the agency, the impact on staff, families, and other providers, CWS staff and leadership are often in a defensive position when issues are brought to their attention. Creating mechanisms to anticipate, learn about, address, and avoid case-based and systemic issues remain goals for the agency.

IV. Performance on Corrective Actions

The following is a presentation of performance and progress by CWS and HCSO in key substantive areas of the reform work and Judgment during this monitoring period.

A. Tribal Collaboration

Children who identify as American Indian and who are eligible for or enrolled in a tribe represent a significant number of investigations and cases handled by CWS. CWS data show from March 1 to September 30, 2019, the agency conducted 1,535 investigations, involving 1,223 unique children.¹⁹ Race and ethnicity data are only available for 75 percent (913) of those children and show that children whose *primary race/ethnicity* is American Indian represented 27 percent (247) of children in investigation; and 20 percent (187) of the children were members of or eligible for membership in a tribe in Humboldt County.

Children whose *primary race/ethnicity* is identified as *American Indian* in CWS/CMS represented 27 percent (150/556) of children who were in foster care at any time from March 1, 2019 to August 31, 2019.²⁰ A standing monthly meeting between CWS and tribal representatives to discuss reports,

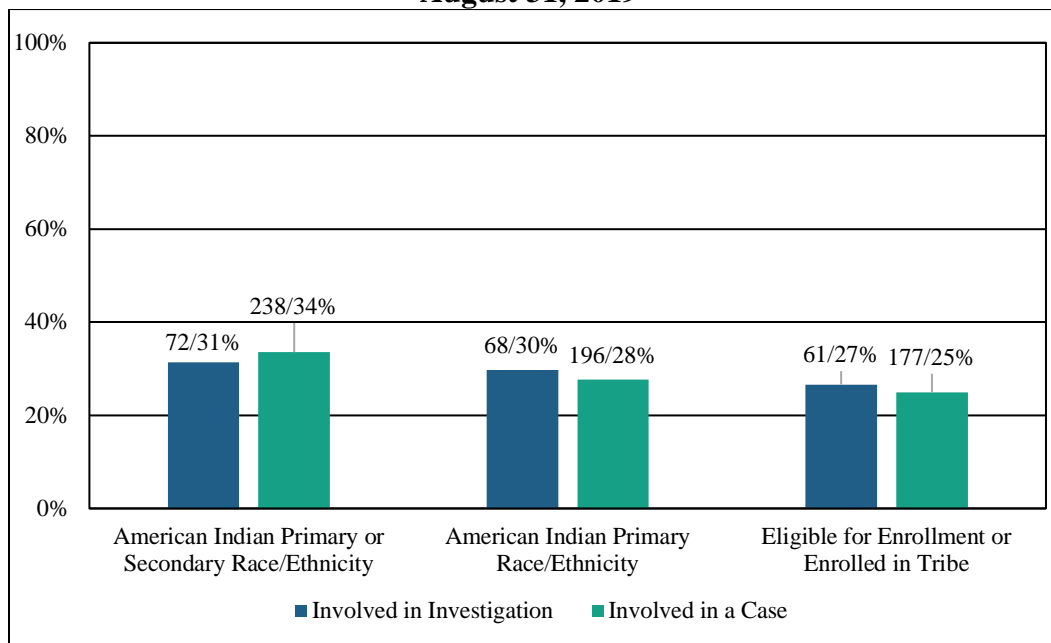
¹⁹ Missing data fields are either blank (310), indicate unable to determine (11), or decline to state (4). CSSP has not validated these data.

²⁰ For investigations, the count is based on a unique count of children involved in an investigation assigned at any time during the reporting period and whose primary ethnicity is identified. If that child was involved in more than one investigation assigned during the reporting period, they are only counted once. Two hundred and thirty-two children with no primary ethnicity identified were removed from the universe of children involved in investigations; 17 children with no primary ethnicity identified were removed from the universe of children involved in a family maintenance case;

investigations, and cases, has not yielded intended results, which include improving data integrity, sharing, and improving good practices.

Children involved in an investigation or case on August 31, 2019 whose *primary or secondary race/ethnicity* is identified as *American Indian* and children who are eligible for enrollment or enrolled in a tribe are also depicted in Figure 1 below.

**Figure 1: American Indian Children Involved with Humboldt County CWS
August 31, 2019***



Source: Humboldt County CWS

*On August 31, 2019 there were 229 children involved in an investigation and 710 children involved in a family maintenance or foster care case.

Given the significant number of tribal families involved with CWS and the federal, state, and local requirements governing child welfare practice when working with tribal children and families, the Judgment requires related corrective actions as discussed below.

1. CWS policies and procedures dictating work with tribes are inconsistently implemented.

In late June 2018, CWS began working with tribes to garner input on policies and procedures, as required by the Judgment. CWS missed both the initial deadline, June 2018, and extended deadline, August 2018, for updating policies with tribal input. However, by the end of November 2018, CWS had gained input from tribes in order to complete policy revisions.

and 17 children with no primary ethnicity identified were removed from the universe of children involved in a foster care case.

Although developed, there is considerable evidence of inconsistent implementation. Tribal representatives feel strongly that the updated and new policies and procedures and the MOUs or protocols discussed below are important to provide guidance and accountability for decision making and actions with families. Policies and procedures are expected to be consistently evident in practices, as legally required, including in Judgment Sections N. and CC. (6). Consistent, reliable evidence in observations, reports, and documented practices, are required to claim full implementation and is currently not available. Tribal representatives are understandably frustrated about inconsistencies in staff knowledge, adherence to policy and a lack of accountability when expectations are either not understood or followed and timely implementation does not occur.

2. *CWS’ contracted tribal consultant continues to facilitate MOUs or protocols between DHHS, CWS, and tribes in Humboldt County.*

This work continues with slow progress, in part due to the continuing distrust, communications issues and concern about policy implementation between some of the tribes and CWS. On February 5, 2019, the Humboldt County Board of Supervisors approved an MOU between the Hoopa Valley Tribe and Humboldt County’s DHHS and CWS.²¹ With the support of the CWS tribal consultant, DHHS and CWS are continuing to work on the development of protocols with other tribes and during this period have met with several other tribal representatives from Bear River, Trinidad, Yurok, and Wiyot to begin to discuss and develop similar MOUs.

3. *CWS took initial steps on programming for tribal families.*

Since at least 2012, tribal social services representatives have been requesting the creation of an “ICWA Unit”, specializing in cases involving tribal families.²² Many years ago in a letter, referring to a process in Implementation Science, tribal representatives proposed participating in the selection process of an “early implementation” team, a small team that would demonstrate a plan, so that adjustments could be made before transitioning the team to a full ICWA unit.²³ The letter cited the “challenges and historic barriers meriting the implementation of an ICWA unit”, as well as the intricacies of ICWA, concurrent tribal/state jurisdiction, and knowledge of the history and culture that is required for effective engagement with tribal families. It also stated that “[s]ocial work with tribal families and communities is politically, socially, and culturally demanding and complex.” Humboldt County was in the early stages of adopting a new practice model and the letter suggested that “[if] social workers are to succeed in working with Indian families under the new practice model, they will need additional support, direction, and guidance.”

²¹ The Judgment (Section P) requires that CWS make good-faith effort to negotiate and develop protocols with the eight federally recognized tribes in Humboldt County governing the process for collaboration that will ensure timely, shared decision making relating to cases involving tribal children.

²² CSSP reviewed a letter from tribes, tribal social services directors to Social Services Branch Director, dated November 2, 2012 and has spoken with current Tribal Social Services Directors about this topic.

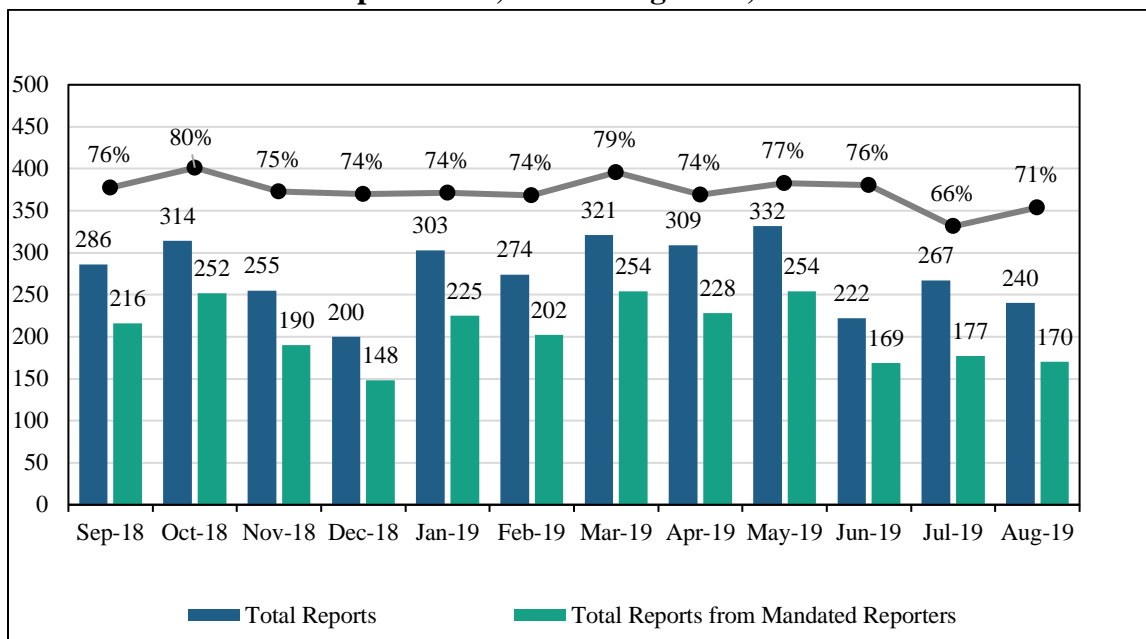
²³ <https://nirn.fpg.unc.edu/resources/implementation-science>

Both the DHHS and CWS Directors have made verbal commitments to exploring specialized programming or a unit dedicated to cases involving tribal families. In August 2019, CWS communicated with Tribal Social Services Directors on the topic, proposing working in formal, paid partnership with local tribes to craft, implement, and monitor a responsive program. Currently however, there is no proposal nor a timeline for developing and implementing a plan.

B. Community Task Force and Inter-Agency Coordination

DHHS and HCSO continue to host a Community Task Force of public agency and community representatives to include those from school districts, Humboldt County’s Office of Education, Department of Probation, DHHS’ Mental Health Division, local law enforcement, tribes, and medical providers, specifically pediatricians and/or representatives of local children’s hospital, as required by the Judgment.²⁴ These professionals represent mandated reporters of suspected child abuse or neglect who are responsible for almost three-quarters of the reports of suspected child abuse and/or neglect to CWS over the past year, depending on the time of year. Figure 2 presents data from September 2018 to August 2019 on the total number of child abuse and neglect reports CWS received and the portion of those reports made by mandated reporters.

Figure 2: Total and Percentage of Suspected Child Abuse and/or Neglect Reports Received by Humboldt County CWS from Mandated Reporters September 1, 2018 – August 31, 2019*



Source: Humboldt County CWS

*CWS previously reported there were 273 reports, 201 (74%) from mandated reporters in February 2019.

²⁴ These representatives are expected to make policy recommendations to their respective departments (Judgment, Section II).

1. DHHS and the HCSO held quarterly Community Task Force meetings during this monitoring period.

DHHS and HCSO sponsored Community Task Force meetings in March, May, and August 2019.²⁵ Co-chairs of the Task Force are a foster and adoptive parent and an educational professional. The Task Force will be seeking a co-chair to replace the foster and adoptive parent, who is taking on a full-time CWS staff position.

Community Task Force meetings focused on DHHS and HCSO updates on achieving the Judgment requirements and engaging task force members in the development of the CPRG.²⁶ NCCD worked with CWS and Task Force members and other local stakeholders to conduct Inter-Rater Reliability testing of the CPRG. Next steps include field testing to identify areas of the tool that could be strengthened to meet Humboldt County's needs.

CSSP also presented highlights of the second monitoring report at the May 23, 2019 Community Task Force Meeting.

The number of active participants in the Community Task Force meetings has reduced over time. Some topics of interest to former and current participants, such as data and continuous quality improvement, have not yet been put on the agenda. The Sheriff, DHHS Director, the Community Task Force Steering Committee, and Community Task Force members must work together to increase and maintain participation of both internal and external stakeholders, as named in the Judgment. NCCD has recommended, and the Community Task Force Steering Committee has agreed, to include interactive activities on the Community Task Force agendas to engage participants in what was a successful exercise during the August 2019 meeting. That meeting also included a presentation by young adult advocates with child welfare expertise who want youth-friendly access to the CWS Ombudsperson's Office.

It is not clear whether CWS and HCSO staff may attend Community Task Force meetings. The HCSO CANRA coordinator and their supervisor and a CWS supervisor, who is also a union representative attend the Task Force meetings. CWS staff interviewed by the Monitor have said they were interested in but not aware of the meetings.

HCSO and CWS state they have prioritized the work of the Task Force to meeting the terms of the Judgment and are committed to addressing other issues of concern to this group over time. Many members of the Task Force are interested in regularly reviewing data related to CWS and HCSO performance and outcomes.

²⁵Agendas, notes, and materials from Community Task Force Meetings may be found at: <https://humboldt.gov/2373/Community-Task-Force>

²⁶ Judgment Section KK. (2)

Initially, tribal representatives concerned about long-standing child welfare issues stated they had participated in multiple meetings and conversations with no significant practice and systems improvements and were thus reluctant to participate in the Community Task Force. Though some representatives do attend, tribal social services are not well-represented at Community Task Force meetings.

2. HCSO and CWS continue to participate in Humboldt County District Attorney's Child Abuse Services Team.

The Humboldt County Child Abuse Services Team (CAST) is a group of professionals representing multiple disciplines, sponsored and hosted by the District Attorney's (DA) Office. The group consists of representatives from the DA's Office, local Law Enforcement, CWS, County Mental Health, tribal representatives, community service providers (including North Coast Rape Crisis), and Victim Witness' Advocates who collaborate to respond to the needs of children and youth requiring forensic interviews. When invited, CWS and HCSO participate in Humboldt County CAST meetings.

The CAST Protocol Development Subcommittee has not met this monitoring period. The CAST Protocol, expected to be finalized by early 2018, is not yet finalized. In the interim, CWS developed processes to notify tribes of CAST meetings. From March to August 2019, there were appointments scheduled in two cases, involving four children. CWS notified the tribe in one of those cases and not the other.

CSSP reviewed the draft CAST protocol, an MOU entitled Guidelines for a Multidisciplinary Team Response to Child Abuse dated 8/29/19. It designates the CAST Coordinator, the Legal Office Assistant, within the DA's Office with scheduling interviews upon referral from law enforcement and determining if there is a history of services by Humboldt County CWS and Tribal Social Services. On November 25, 2019, HCSO reported that the Chair of the CAST Protocol Development Subcommittee stated the protocol is final, and signature(s) are needed from each tribe. The process and timeline for gaining signatures are not clear.

C. HCSO Training and CWS-NCCD Training and Technical Assistance Contract

The Judgment includes training requirements for CWS and HCSO staff, related to the MOU between the two agencies and updated policies. There are also corrective actions related to CWS' technical assistance from NCCD. HCSO and CWS have provided documentation of training and coaching delivered during this monitoring period which meet the expectations of the Judgment.

1. HCSO trained all new staff required to be trained during this period but has not yet provided annual CANRA refresher training to all deputies.

The HCSO CANRA Coordinator provided CANRA training to all new staff in March 2019, within 30 days of hire, as required by the Judgment (EE.5) and began to deliver annual refresher training to all staff. These sessions address:

- HCSO corrective actions which are included in this Judgment;
- CANRA and mandated reporter requirements;
- Confidentiality of mandated reporters;
- Procedures for reporting to and contacting CWS; and
- The impact of trauma on children.

By August 31, 2019, all but 20 HCSO staff had participated in annual refresher training and HCSO expected that all staff would participate in annual refresher training by mid-November 2019. HCSO achieved that goal on November 14, 2019.

2. CWS continues to host Child and Family Team Meetings Additional data is needed to assess this practice.

A Child and Family Team is a group of individuals which include the child/youth, non-minor dependent, family members, tribal representative(s), professional supports, community supports, and other individuals identified by the family who make up the family's support system also known as network.^{27,28} Meetings are expected to be held for case planning, at key decision points in a case, especially to prevent a child/youth from entering foster care.

CWS continues to train and encourage staff on how to document Child and Family Team (CFT) meetings so that more accurate data may be captured. CWS provided data on meetings held from March 1, 2019 to August 31, 2019. Reportedly, 54 CFT meetings related to 42 (6%) of the 664 investigations during that period. There were also 360 CFT meetings related to 207 in-home or foster care cases open during that period.²⁹ CWS does not collect qualitative data on CFT meetings and thus it is not possible to assess their effectiveness. These meetings are a key part of the Humboldt County Practice Model. CWS should implement multiple measures to understand the impact of CFT and better support staff and families as they participate in them.

3. NCCD continued to deliver leadership coaching and technical assistance to CWS.

NCCD's overall TA objectives with CWS during this period have been to:

- Improve the use of Structured Decision Making[®] (SDM[®]) assessments in all stages of service,
- Build internal SDM[®] coaching capacity, and

²⁷ CWS Child and Family Team Meetings Policy and Procedure, June 14, 2018.

²⁸ Judgment, Section M.

²⁹ As there is not a standardized process for collecting these data, these figures are likely an underrepresentation of how many CFTs occurred.

- Increase the ability of CWS leadership to recognize, understand, and appreciate cultural differences and the impact of race, historical trauma, class, gender, sexual orientation, and other “isms” on individuals, their management decisions, the larger organization, and the youth/families they serve.

NCCD provided multicultural coaching for supervisors and the leadership team and consultation on CWS’ training program development. As part of that consultation, NCCD recommended that CWS tap into staff expertise, community, and tribal partners to help deliver training to staff.

NCCD also worked on increasing CWS’ use of SafeMeasures[®] and building continuous quality improvement processes. Relatedly, NCCD hosts monthly SDM[®] technical assistance calls with CWS staff and facilitated a group to conduct case reviews related to SDM[®] safety assessments. There is a long-standing NCCD recommendation for monthly case reviews by and feedback from supervisors to help ensure practice fidelity. CWS has not implemented this process. CWS reports that systemic continuous quality improvement (CQI) work with NCCD is not yet a focus, given other requirements of the Judgment. As previously stated, CSSP considers the work needed to create a comprehensive CQI system essential to CWS’ ability to monitor and sustain progress. CWS must implement case reviews processes to ensure that the requirements of the Judgment are being met.

During this monitoring period, CWS and NCCD developed and revised a plan to collect data for the workload study help the agency ensure sufficient staff resources and manage existing resources more effectively.³⁰ Staff will be asked to complete a short questionnaire, an assessment of organizational culture, aimed at informing areas of the overall evaluation and improving the effectiveness of the recommendations stemming from the study.³¹ The timeline for data collection to inform the workload study has shifted from February to April 2020. NCCD expects to produce a final report from the workload study by June 30, 2020.

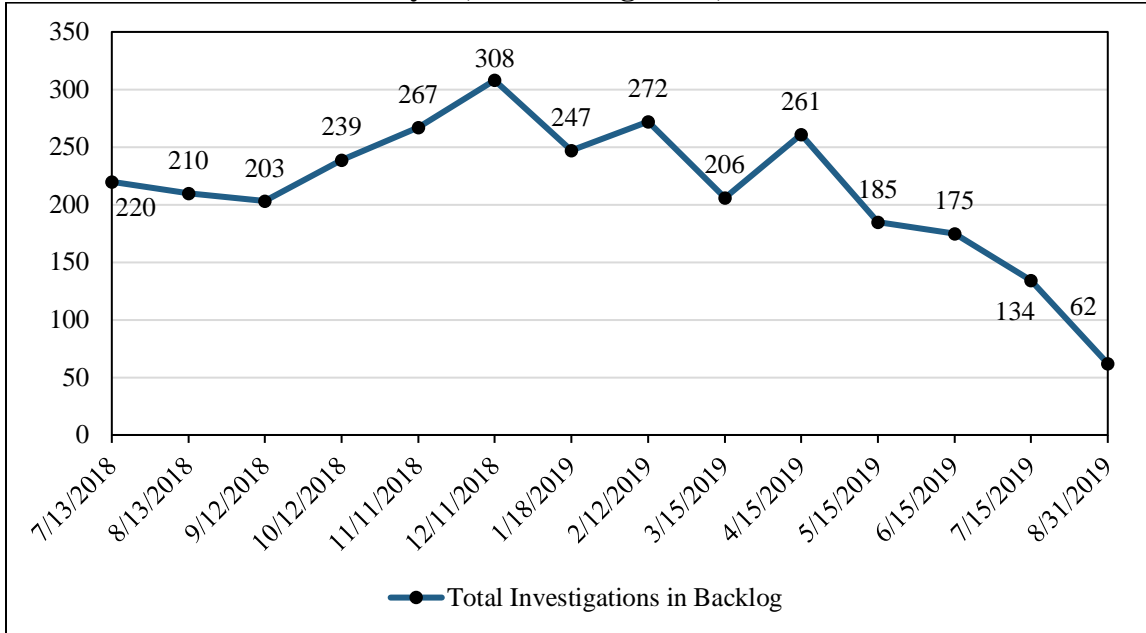
4. Creating a dedicated team to close backlogged investigations has significantly reduced the backlog of investigations.

Figure 3 shows number of backlogged investigations at points in time from March 1, 2019 to August 31, 2019.

³⁰ Judgment, Section CC. (3)

³¹ Organizational Social Context Measure takes about 20 minutes to complete: <http://cbhr.utk.edu/osc>

**Figure 3: CWS Investigations Backlog
July 13, 2018 – August 31, 2019**



Source: Humboldt County CWS

In June 2019, CWS created a specialized unit with a supervisor and three social workers who partner to close overdue investigations. They began by focusing on all the open investigations of the social worker with the highest number of investigations in backlog. CWS paired a social worker from the new unit to the assigned social worker to work on closing backlogged investigations. This support strategy appears to have been effective. CWS has not developed a plan for the unit once the backlog is eliminated.

DHHS also increased the number of social worker positions for investigations from 15 to 18 and adding two social workers and a supervisor in August 2019. As of August 31, 2019, there were 18 social workers assigned to investigations, including six in training.³² CWS reports there were also 18 vacancies across all programs as of August 31, 2019. CWS plans to predominantly hire additional social workers in three cohorts during the year, in February, July, and November.

In addition to the staffing support, CWS implemented supervisory and tracking processes to insure backlog reduction. In May 2019, in order to track and understand investigations extending beyond 40 days, the CA AG and CWS agreed to implement a form that CWS social workers would submit to their supervisor to request an extension for any investigation expected to be pending beyond 39 days. The form required social workers to identify the reason for an extension and supervisors to review and approve legitimate extensions. Investigations open for 40 days or with an approved extension, could be noted separately in a backlog count. Social workers and supervisors did not

³² One additional social worker assigned to investigations is on leave.

routinely complete the form and CWS did not follow-up with the AG's Office about this agreement. As of August 31, 2019, a request for extension form had been submitted for only 35 percent (74/212) of investigations in backlog status from June to August 2019.

A supervisor approved most, 62, of the 74 requests for extensions. The most frequently given reason for needing additional time for an investigation was to complete documentation in CWS/CMS.

D. Implementing a New Emergency Response System

CWS has maintained a 24-hour emergency response system with social worker screeners handling incoming calls, directly inputting information into CWS/CMS, and reporting to law enforcement. CANRA Coordinators at both HCSO and CWS remain in place to help track reports the agencies make to each other.

HCSO

Data reflect that HCSO assigns a case number to all CANRA reports received, as required by the Judgment. During the monitoring period, HCSO made 54 referrals to CWS and forwarded 19 reports to other law enforcement agencies. HCSO reports that its dispatch system contains a feature allowing dispatchers to forward calls immediately to the Arcata, Eureka, and Fortuna Police Departments.³³

CWS

On March 16, 2018, CWS implemented a 24-hour system for directly receiving and responding to reports alleging child abuse and/or neglect. Staffing at the CWS hotline has fluctuated during this monitoring period due to vacancies, leaves, and promotions.

CWS reports that as of August 31, 2019, there are six full-time social worker screeners, assisted by a supervisor, assigned to the hotline during the day. A social worker also provides training and coaching once a week. A supervisor and two social workers, one answering the phone and one prepared to respond in-person if needed, are expected to volunteer to staff the agency's after-hours response each day using a point system. Social workers are expected to earn a minimum number of points through volunteering for after-hours shifts. Some staff are excused from the on-call shift for multiple reasons, mostly medical. Others reportedly routinely give up their selected shifts, leading to difficulty finding a replacement. This ongoing use of daytime employees across the agency for overnight and weekend staffing creates a burden for many staff and, as presented in CSSP's first monitoring report, is not sustainable. CWS agrees.

In August 2019, CWS leadership shared a plan, developed in partnership with staff, for review and approval by the American Federation of State, County, and Municipal Employees (AFSCME),

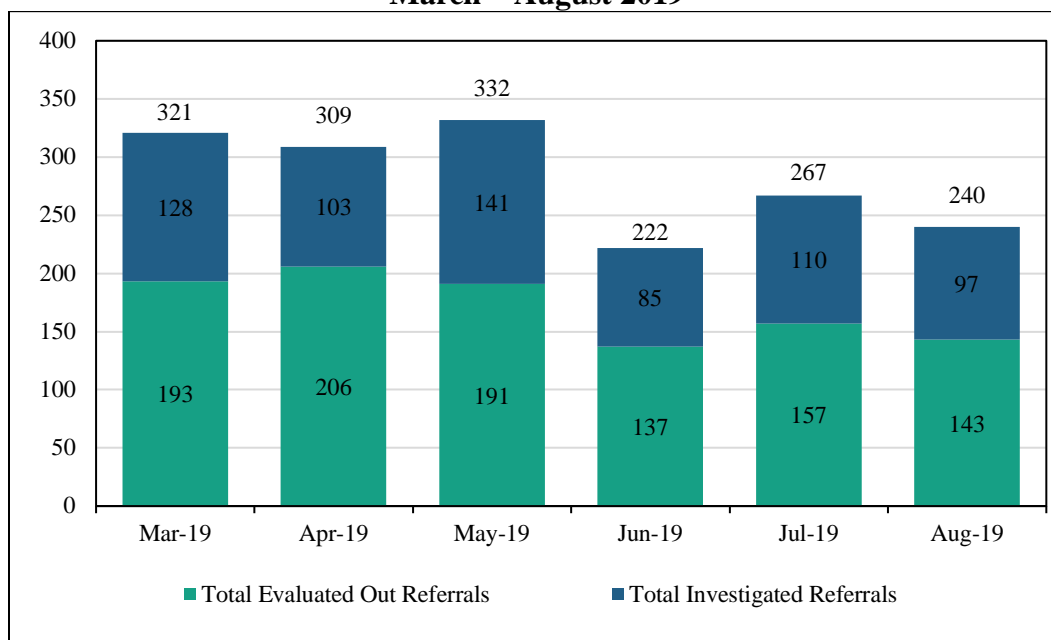
³³ Fortuna Police Department dispatches for the Ferndale and Rio Dell Police Departments.

Local 1684, the union representing Humboldt County employees. The proposed plan is an alternative to the current weekday after hours staffing plan, creating an extended-hours unit. The agency’s 10 PM and after weekday and weekend staffing would remain as described above, applicable to the after-hours or on-call coverage process.³⁴ No date to approval or implementation of this plan has been provided.

CWS data show from March 1, 2019 to August 31, 2019, the agency received 1,691 calls regarding suspected abuse and/or neglect.³⁵ About two-thirds of those calls (1,027 of 1,691/61%) were “evaluated out” by CWS, deemed as not reaching the threshold for a child protection response.

Figure 4 below shows the number of child abuse and neglect reports received during this monitoring period and the number assigned for investigation each month.

**Figure 4: CWS Reports Received, Evaluated Out, and Assigned for Investigation
March – August 2019**



Source: Humboldt County CWS

CWS intake determined that the overwhelming majority, 82 percent (544) of the 664 reports assigned for investigation from March 1, 2019 to August 31, 2019, required a social worker to respond within 10 days; the remaining 18 percent (120) of the reports were deemed to warrant an immediate response from CWS (see Figure 5). Data from reviews by NCCD show an average agreement rate of 89 percent between CWS and SDM on the decision on the timeframe within

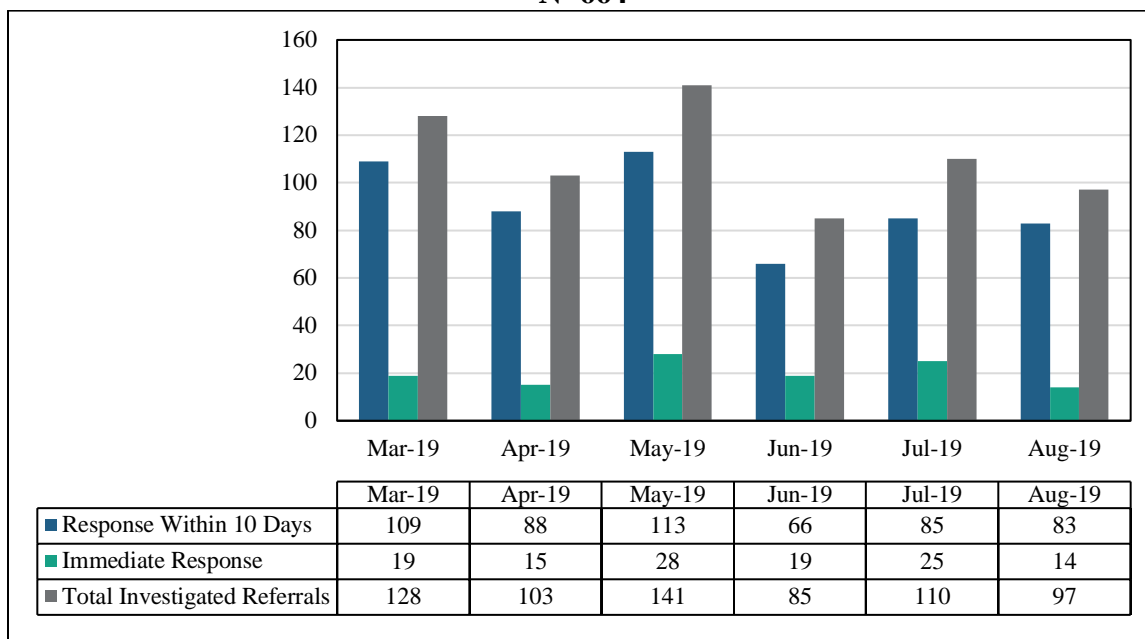
³⁴ CWS reports demand at the hotline is reduced after 10 pm.

³⁵ This is a count of discrete reports which could reflect multiple reports about the same family, child, or even the same allegations. The expectation is that information from a new report meeting criterion for investigation and having already been assigned for investigation, would be added to the open investigation, as opposed to creating a new investigation.

which a social worker should respond.³⁶ SafeMeasures® data also indicate that the first assigned social worker is very often in agreement with the decisions made at the hotline to accept a referral for investigation and the assigned response time. Agreement data have remained consistent over time. Qualitative data on the appropriateness of decisions are not available.

Figure 5 below shows the response times for CWS investigations during this monitoring period.

**Figure 5: Response Times for CWS Investigations
March – August 2019
N=664**



Source: Humboldt County CWS

To remain current on investigations and prevent a reoccurring backlog of investigations, since June 2019, CWS has assigned social workers to investigations in pairs. CWS/CMS data indicate that a CWS social worker responded in a timely manner in 82 to 95 percent of the 664 investigations assigned from March 1, 2019 to August 31, 2019. Each social worker pair was assigned an average of 19 investigations per month. The Child Welfare League of America recommends a caseload of 12 for child protection investigators.³⁷

1. CWS maintains an electronic data entry and cross-reporting systems for intake.

Since June 2018, CWS social workers who screen reports of abuse and/or neglect, make real-time, electronic reports to law enforcement agencies with automatic notification to the Humboldt County DA’s Office.

³⁶ Ibid.

³⁷ <https://www.cwla.org/wp-content/uploads/2014/05/DirectServiceWEB.pdf>

CWS reports sending 1,055 cross reports to law enforcement from March 1, 2019 to August 31, 2019. The majority (1,011//96%) of the reports were to local law enforcement. Half (504/50%) of the local reports were to HCSO, followed by Eureka (233/23%), Arcata (107/11%), Fortuna (98/10%), Rio Dell (32/3%), Ferndale (19/2%), Hoopa Valley Tribal (15/1%), Blue Lake (2/<1%), and Yurok Tribal (1/<1%) Police Departments.³⁸ CWS also sent reports to other counties in California, California Highway Patrol, and other states.

**Table 1: CWS Cross Reports to Local Law Enforcement
March – August 2019
N=1,011***

Receiving Agency	Number (Percent)
Humboldt County Sheriff’s Office	504 (50%)
Eureka Police Department	233 (23%)
Arcata Police Department	107 (11%)
Fortuna Police Department	98 (10%)
Rio Dell Police Department	32 (3%)
Ferndale Police Department	19 (2%)
Hoopa Valley Tribal Police Department	15 (1%)
Blue Lake Police Department	2 (<1%)
Yurok Tribal Police Department	1 (<1%)

Source: Humboldt County CWS
*CWS sent some reports to multiple agencies.

HCSO reports prioritizing reports received from CWS and responding immediately.

2. HCSO transitioned to an electronic cross-reporting system and continues a manual reconciliation process to ensure responses.

HCSO implemented a new records management system that allows for better electronic tracking of reports to and from CWS. This system has streamlined the tracking process but the HCSO CANRA coordinator spends a couple of hours on a weekly basis on this task. HCSO reports that there were 575 reports between CWS and HCSO from March 1, 2019 to August 31, 2019.³⁹

³⁸ CWS and HCSO have agreed that CWS will forward all reports labeled child abuse and/or severe neglect to HCSO.
³⁹ HCSO reports receiving 521 reports from CWS and sending 54 reports to CWS.

3. HCCO attended to reports that fell outside the jurisdiction.

HCSO reported handling 19 reports of child abuse that fell outside of HCSO jurisdiction. Actions taken include: taking an initial report, ensuring the child(ren)'s safety, and forwarding the report to the proper jurisdiction for initial or further investigation. The HCSO record management systems dispatchers immediately send calls to the Arcata, Eureka, and Fortuna Police Departments. The Fortuna Police Department serves as dispatch for the Ferndale and Rio Dell Police Departments.

E. Revision of Policies and Procedures

Both HCSO and CWS circulated new and updated policies to staff by email and have reviewed policies with staff in group settings. CWS policies were also reviewed by representatives of the Community Task Force and tribes who also provided feedback to CWS.

Expectation are that supervisors coach staff to practice in adherence to policies, supervisors and managers review the performance work of individual staff, and that leadership remain updated on program and system-wide performance. For CWS, implementation of practice expectations remains inconsistent and therefore, the recommendations set forth in this report are meant to help ensure the requirements of the Judgment are being met. Both CWS and HCSO leadership and staff must take steps to ensure practice and services reflect updated policies, in order to demonstrate and fulfill requirements of the Judgment.

F. Complaint System

As previously reported, both CWS and HCSO created complaint procedures with timeframes for handling complaints submitted both formally and informally, in writing and orally, in response to the judgment. CWS also created a policy regarding handling complaints and designated a supervisor who is responsible for ensuring that all complaints are investigated.

CSSP discussed a plan with DHHS for conducting a review of the Ombudsperson's Office to understand structure, functioning, and impact. DHHS presented a preferred option for a review by DHHS staff. Initially, CSSP understood the review would be done in partnership but agreed to observe the DHHS review process.

1. CWS' Ombudsperson's Office continues to take action on complaints.

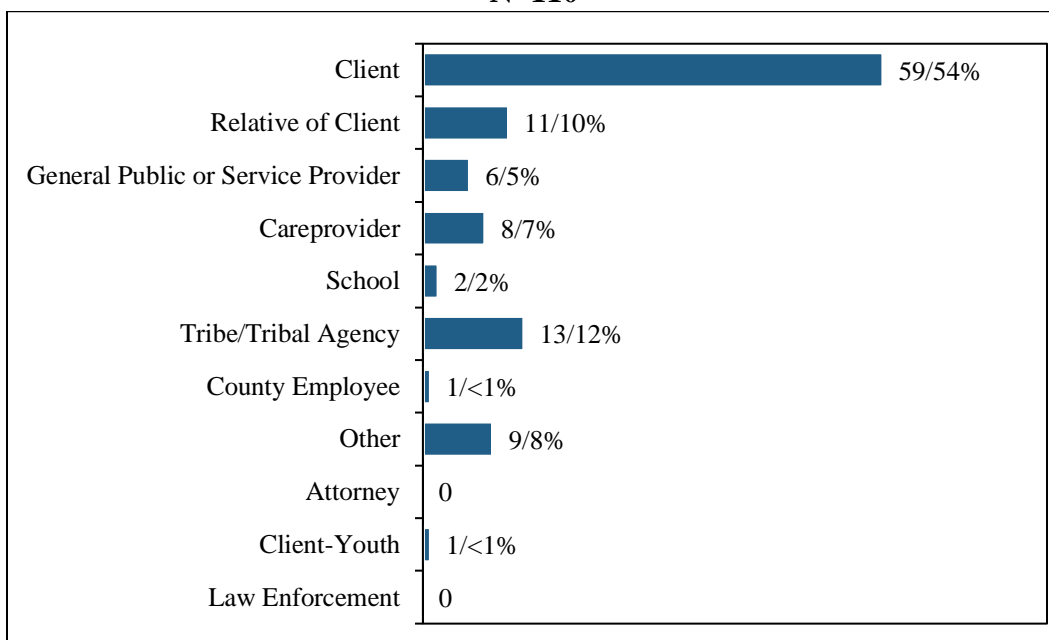
CWS opened an Office of the Ombudsperson to receive complaints in-person, by phone, fax, mail, or electronic mail on April 13, 2018.⁴⁰ The Office also accepts anonymous reports. Most reports have been received by telephone, followed by email. A CWS Program Manager oversees the Office of the Ombudsperson and a supervisor handles complaint, with assistance from other assigned supervisors when needed. CWS procedures are to respond to each complainant within two business

⁴⁰ <https://humboldt.gov.org/2360/CWS-Office-of-the-Ombudsperson>

days. CWS tracks each complaint with the goal of resolution within 55 days business days. The Ombudsperson prepares quarterly reports to staff, management, and DHHS.

Data provided to CSSP by CWS indicate that the Ombudsperson’s Office began 110 investigations in response to complaints received from March 1, 2019 to August 31, 2019. Most of the complaints were made by a parent or relative of a parent/child involved with CWS, followed by a tribal agency, service provider or member of the general public, and a child’s caretaker.

**Figure 6: CWS Ombudsperson Complainant Affiliation
March – August 2019
N=110**



Source: Humboldt County CWS

The Ombudsperson reports an average of 12 pending inquiries on complaints at the end of each month from March 2019 to August 2019. Complaint themes consist of the need for improved communication with staff; decisions made in a case; and clarification of policies or procedures. Recommendations made by the Ombudsperson’s Office include that CWS improve decision making on overseeing parent-child visits (supervised versus monitored versus unsupervised) and continue to provide training and coaching to staff on policies and procedures. CSSP observed part of DHHS’ Compliance and Quality Assurance Administration and Privacy Office review of the functioning of the CWS Ombudsperson’s Office. The DHHS review focused on internal functions and structures of the new office. CSSP will supplement the review with a review of related CWS records and interviews and expects to share findings in conjunction with DHHS’ reports and recommendations, by the end of 2020.⁴¹

⁴¹ Finding and recommendations from DHHS’ review are to be on the calendar of the February 20, 2020 Community Task Force Meeting.

2. HCSO continues to track complaints related to CANRA.

In response to the judgment, HCSO updated policy on Personnel Complaints (now Policy 920) to reflect that formal and informal complaints that relate to child abuse and/or neglect will be categorized as CANRA and a log of complaints will be maintained. The CANRA Coordinator handles and tracks policy or procedural complaints related to CANRA. The CANRA Coordinator also reviews the log of personnel complaints, to see whether any are related to CANRA and require tracking.

HCSO reports receiving 98 callers or persons visiting their office between March 1, 2019 and August 31, 2019 with a complaint. Reportedly, none of these were related to a CANRA case and none of the formal complaints handled during this period related to CANRA.

V. Recommendations

The recommendations below primarily address CWS, although some involve the need for additional collaborative work involving HCSO and the community. Each of the recommendations relate to an action Humboldt County has agreed to achieve, ensure, and maintain in the Judgment.⁴² We organized the recommendations by CWS' agency functions. Many of the recommendations are in response to an urgent need to embed quality improvement activities within CWS, to ensure demonstrated adherence with laws, policies, procedures, and Government to Government MOUs. This work, in collaboration with DHHS' Children's Mental health and other county partners represented at the Community Task Force, must be done simultaneous to completing other tasks of the Judgment, including workload study, implementing the CPRG, and attending to the required collaborative work with Nations.

Recommendations relate to ensuring and sustaining the significant efforts made in the months leading to this Judgment and throughout 2018 to redesign policies and procedures. However, the efforts to draft policies and procedures must now extend to assessing the status of implementation and performance and making necessary adjustments to insure implementation and to remain accountable and responsive to families, partners, tribal nations, and the broader community to protect children and assist their families.

DHHS, HCSO, and CWS have reviewed the recommendations, some of which are already planned. Over the next 60 days, CSSP will work with CWS and HCSO to establish priorities, specific actions to be taken and timeframes for implementation. Each recommendation is related to one or more requirement of the Judgment and contains the applicable reference(s).

⁴² Refer to Section XX of this report for a listing of each Corrective Actions of the Judgment and the County's progress and status in meeting them.

To improve the functioning of the hotline, CWS should:

- 1. *Record hotline calls for quality assurance and training purposes.*** Supervisors should listen to and assess an established number of calls by social worker each month for customer service and comparison to what is in the CWS record and SDM[®] tools.⁴³
- 2. *Implement quality assurance activities at intake to support supervisors in reviewing each report to the hotline*** for adequacy of information gained; inquiry about tribal membership or eligibility; partnering, as required, with tribal social services for completion of SDM[®] forms and decision making. QA activities of functions at this point include rate of agreement with initial decisions and tribal collaboration.^{44,45}
- 3. *Have managers perform QA reviews on a set number of intake reports*** each month for staff and system development.⁴⁶ With the implementation of recommendation 1. above, supervisors and managers can compare data from recordings to results of reviews to ensure accuracy and fidelity to SDM hotline tools.^{47,48}

To improve investigations practice, CWS should:

- 4. *Continue efforts to fill vacancies and increase staffing*** and make sure staff have adequate resources to conduct both timely and quality investigations.⁴⁹
- 5. *Support investigators in continuing to make timely contacts with children, their caretakers, and others who may inform the investigation, and making timely entries CWS/CMS.*** This may include continuing support from other staff in entering documentation in CWS/CMS.⁵⁰
- 6. *Require supervisors to conduct monthly reviews of at least one case per social worker per month*** using the CA SDM[®] case reading tools to assess fidelity to safety organized practices and completing SDM[®] tools.⁵¹

⁴³ Recordings, electronic copies of faxes, and web-based reports by hotline staff are also used for quality assurance and training. Additionally, many jurisdictions record calls to provide to law enforcement.

⁴⁴ Judgment, Section K.

⁴⁵ Judgment Section BB. 1.b.

⁴⁶ Judgment Sections, G. and I.

⁴⁷ Judgment, Section CC. (4).

⁴⁸ Judgment Section BB. (1) c.

⁴⁹ Judgment Section CC. (3).

⁵⁰ Judgment, Section CC. (8) c.

⁵¹ Judgment, Section BB. (1) c.

7. ***Track time to completion of investigations by social worker and supervisor*** to better understand performance issues, barriers, and dynamics related to geographic distance or staff tenure, for example. Managers can view completion rates in SafeMeasures®.⁵²
8. ***Create a plan on how to sustain the progress on the backlog reduction and to determine investigations that legitimately reflect a need to maintain an open file on a family.*** The plan should reflect the next steps for the work of the backlog unit.⁵³

To fulfill a requirement of the Judgment, HCSO, CWS, and County stakeholders must:

9. Work with partners to finalize and implement the CAST protocol/MOU by the end of February 2020.⁵⁴

To improve communication, adherence to law and policy and its relationship with tribes, CWS must:

10. ***Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy*** mandates in all practices. This work will involve clearly articulating state and county policy and procedures, as well as the County's Practice Model, which articulate values, principles, and additional expectations and actively working in good faith to be accountable to those.^{55,56}
11. ***Create clear, agreed upon, responsive mechanisms to resolve disagreements*** between a tribe and CWS on assigning a report for investigation or opening a case after an investigation. Processes may vary by tribe. Ongoing sharing of information and shared decision making is not always occurring in accordance with CA law or CWS policy.^{57,58}
12. ***Actively plan with tribes for ICWA programming, as promised.*** After many false starts and promises, the County has now recommitted to forming an ICWA unit. CWS must now work actively with tribal representatives in the co-design and related ICWA programming, including setting and following a timetable for both planning and implementation.⁵⁹

⁵² Judgment CC. (8) d.

⁵³ Judgment, Section CC. (8) c.

⁵⁴ Judgment, Section B.

⁵⁵ Humboldt County CWS and HCSO have guidance in policies, procedures, and practice model and provide and receive coaching and training in best practice to achieve this goal.

⁵⁶ Judgment, Section E and N (1).

⁵⁷ Judgment Section CC. (6)

⁵⁸ Judgment, Sections N. and N. (1).

⁵⁹ Ibid.

13. *Continue to work actively with the Tribal consultant to negotiate tribal protocols/MOUs* with the remaining tribes and to assist all level of staff in adhering to the agreements of each MOU.^{60,61}
14. Implement multiple measures to *understand the impact of and experiences with CFT meetings and better support* staff and families as they participate in CFT meetings and implement, track, and modify plans created during meetings.⁶²

To create a learning environment and increase accountability, CWS should:

15. *Create an agency wide CQI program* which takes data from activities mentioned above and other sources to inform all levels of the agency and interested stakeholders about performance. These are ways of finding, correcting, anticipating, and preventing issues. Steps to assess the agency's performance of practice expectations must include face-to-face interviews with children, youth and families, to learn about their experiences with the system.^{63,64}
16. *Involve youth, parents, other family members, partner agencies, tribes, Community Task Force, and other community members* in designing reviews, collecting data, and analyzing data to increase accountability and transparency.^{65,66}
17. *Share the results of DHHS' internal review of systems of the Ombudsperson's Office with the Community Task Force*, discuss and take actions on recommendations to make the Office more effective.^{67,68}

DHHS and HCSO should:

18. *Support the Community Task Force in moving forward to form a functioning CQI subcommittee*. The Task Force was established to provide a forum for information sharing and accountability and can serve to assist DHHS and HCSO in sustaining system reform and understanding functioning.

⁶⁰ Ibid.

⁶¹ Judgment, Section O.

⁶² Judgment, Section CC. (4)

⁶³ Judgment, Section KK. (3).

⁶⁴ Judgment, Section CC. (4).

⁶⁵ Ibid.

⁶⁶ Ibid.

⁶⁷ Ibid; Judgment, Section JJ.

⁶⁸ Judgment, Section CC. (4).

VI. Summary of Performance on Corrective Actions
THE PEOPLE OF THE STATE OF CALIFORNIA v HUMBOLDT COUNTY'S
DEPARTMENT OF HEALTH AND HUMAN SERVICES AND HUMBOLDT COUNTY'S SHERIFF'S OFFICE

Table 2: Summary of Performance on Corrective Actions Required By Judgment

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Memorandum of Understanding ("MOU") and Inter-Agency Coordination				
A. (1) Child Welfare Services (CWS) shall revise its policies and procedures to reflect the procedures set forth in the MOU and circulate the MOU and revised policies and procedures to all personnel.	May 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per formal written request made by CWS	A. (1) Partially Completed CWS circulated policy and procedures on cross reporting on 5/9/18. CWS expects to finalize Intake policy by 10/12/18. CWS circulated the MOU to staff 2/15/18.	A. (1) Completed policy revision CWS circulated Intake policy to staff on 10/12/18.	
A. (2) The Sheriff's Office (HCSO) shall revise its policies and procedures to reflect the procedures set forth in the MOU and circulate the MOU and revised policies and procedures to all personnel.	March 16, 2018	A. (2) HCSO Completed policy revision 3/14/18 Policies and procedures and MOU circulated to staff 3/14/2018.		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Child Abuse Services Team (CAST) Protocol and Collaborative Processes				
<p>B. Defendants shall continue to participate in the Humboldt County CAST Advisory Board and Protocol Subcommittee as long as they are invited by the Humboldt County District Attorney. (Defendants had indicated that a revised CAST protocol would be finalized by the Protocol Subcommittee by December 31, 2017.) Defendants shall provide the Attorney General's Office with a copy of the final CAST protocol within seven days of entry of this Judgment.</p>	Ongoing	<p>B. Completed CWS and HCSO continue to be invited to and participate in the Humboldt County CAST Advisory Board and Protocol Subcommittee. The Humboldt County DA's Office did not finalize the CAST protocol within seven days of the judgment.</p>	<p>B. Completed Defendants are invited to and participate in the Humboldt County CAST Advisory Board. The Humboldt County District Attorney's Office has not held Protocol Subcommittee meetings during this period.</p>	<p>B. Completed Defendants are invited to and participate in the Humboldt County CAST Advisory Board. The Humboldt County District Attorney's Office has not held Protocol Subcommittee meetings during this period.</p>
<p>B. If the CAST protocol was not finalized by December 31, 2017, Defendants shall provide a good-faith estimate for completion within seven days of entry of this Judgment and provide a copy of the final CAST protocol within seven days of completion for review.</p>	February 20, 2018	<p>B. Not completed The CAST protocol has not yet been finalized by the Humboldt County District Attorney's CAST Advisory Board.⁶⁹</p>	<p>B. Not completed The Humboldt County District Attorney's Office has not finalized the CAST protocol.</p>	<p>B. Not completed The Humboldt County District Attorney's Office reported to HCSO that the protocol is finalized except for signature(s) from tribes.</p>

⁶⁹ Text updated from first report to reflect that Humboldt County's DA's Office is responsible for finalization of the protocol.

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>B. If the CAST protocol is not finalized within six months of the entry of Judgment, Defendants shall meet and confer with the Attorney General's Office to discuss the status of the protocol, timeframe for completion, and additional steps Defendants can take to address coordination of CAST interviews to the extent any are needed.</p>	<p>August 13, 2018</p>	<p>B. Completed CWS has developed a protocol for accessing CAST while awaiting a final protocol. Defendants have conferred with the AG.⁷⁰</p>	<p>B. Incomplete CWS and HCSO have been in communication with the AG regarding the status of the protocol, timeframe for completion, and the steps CWS is taking to coordinate CAST interviews while without a finalized CAST protocol.</p>	<p>B. Incomplete The Humboldt County DA's Office has not finalized the CAST protocol and reports to HCSO requiring signatures from tribes.</p> <p><i>See Recommendation 9. of this report: Work with partners to finalize and implement the CAST protocol/MOU by the end of February 2020.</i></p>

⁷⁰ First report read "Not Completed".

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>C. Defendant CWS and the Mental Health division of DHHS are currently developing an inter-agency collaboration protocol to ensure that staff from the divisions coordinate the provision of mental health and child welfare services. The protocol shall address the sharing of confidential information between the divisions and include revised processes to ensure timely assessments of children in protective custody. CWS has also created procedures to address the sharing of information among other agencies and entities that are a part of a multidisciplinary team, including, but not limited to, medical personnel, law enforcement officers, school district employees, and tribal representatives, pursuant to Welfare & Institutions Code sections 5328 and 5328.04. Within 30 days of the entry of Judgment, CWS shall provide the Attorney General's Office with documents relating to this section for review and input.</p>	<p>March 16, 2018</p>	<p>C. Completed protocol 3/16/18 CWS and Communication with Children's Mental Health/CMH Policy and Procedure and Mental Health Screening Tool (MHST) and Request for Access to Services Policy and Procedure.</p> <p>CWS and CMH developed an agreement for a multi-disciplinary team (MDT).</p>	<p>C. Implementation Incomplete No system-wide data is available on CWS ensuring coordination of mental health services.</p>	<p>C. Implementation Incomplete No system-wide data is available on CWS ensuring coordination of mental health services and other community-based services. Anecdotally, there have been complaints about a lack of coordination and delays accessing appropriate services, especially for adolescents presenting with elevation risk of harm to themselves.</p>
Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendant CWS				
<p>D. Within 120 days of the entry of this Judgment, CWS shall incorporate the requirements set forth below into its policies and procedures and circulate to all personnel.</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per formal written request made by CWS</p>	<p>D. Completed CWS updated and circulated policies on 6/26/18.</p>		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>E. CWS shall ensure compliance with CANRA, including the confidentiality requirements set forth under Penal Code section 11167, and CANRA's implementing regulations set forth in California Code of Regulations, Title 11, division 1, chapter 9 (11 C.C.R. § 900 et seq.), including regulations relating to investigations of suspected child abuse in out-of-home care facilities, and the Welfare & Institutions Code and Division 31 regulations.</p>	<p>June 14, 2018, extended to June 25, 2018</p>	<p>E. Completed policy development CWS developed Policy and Procedure on Mandated Reporter and circulated to staff on 6/26/18</p> <p>CWS developed Policy and Procedure on Reports on Open Investigations or Cases and circulated to staff on 6/26/18.</p>		<p><i>E. Implementation Incomplete</i> <i>Social workers are aware of this policy. CWS reports during this period there were 33 reports regarding children in out-of-home care, 21 were evaluated out and 12 were assigned for investigation.</i></p> <p><i>CWS has not taken steps to review and ensure this practice.</i></p> <p><i>See Recommendation 10 of this report: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i></p>
<p>F. CWS shall implement an emergency response system available 24 hours a day, seven days a week, under which social worker screeners will handle incoming calls as they come in to ensure prompt response. CWS shall, within 30 days of the entry of this Judgment, complete its implementation of an automated call tree system that connects callers who report suspected child abuse or neglect directly to screeners.</p>	<p>March 15, 2018 and ongoing</p>	<p>F. Completed 3/16/18</p>	<p>F. Maintained</p>	<p>F. Maintained</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>G. CWS shall transition from a paper-based intake system to an electronic intake system that is not reliant on data entry staff, under which social worker screeners directly input information into Child Welfare Services/Case Management System (CMS) (or any future successor system) and the WebSDM assessment tool.</p>	<p>June 14, 2018 and ongoing</p>	<p>G. Completed 6/4/18 CWS has fully transitioned to an electronic data entry system for intake. Social worker screeners enter information, including on the Web SDM assessment tool in CMS.</p>	<p>G. Maintained</p>	<p>G. Maintained <i>See Recommendation 3. Of this report: Have managers perform QA reviews on a set number of intake reports each month.</i></p>
<p>H. CWS shall ensure timely cross-reporting to law enforcement agencies and the District Attorney's ("DA") office.</p>	<p>June 14, 2018 and ongoing</p>	<p>H. Completed 6/4/18 Cross reporting during business hours as of 3/29/18: 1,046 reports sent to law enforcement agencies and the DA's office through 8/31/18.</p>	<p>H. Maintained CWS sent 981 cross-reports sent to law enforcement agencies and the DA's office Ongoing quality improvement is needed to avoid duplication of cross-reports.</p>	<p>H. Maintained CWS sent 1,055 cross-reports sent to law enforcement agencies and the DA's office. Ongoing quality improvement is needed to avoid duplication of cross-reports.</p>
<p>H. (1) Upon receipt of a report that is required to be cross-reported under Penal Code section 11166, subdivision (j), a social worker shall immediately or as soon as practicably possible cross-report by telephone to the Sheriff's Office or other appropriate law enforcement agency and make a follow up written report as required by CANRA.</p>	<p>June 14, 2018 and ongoing</p>	<p>H. (1) Completed 6/4/18 CWS implemented a system for immediate electronic cross reporting of reports of abuse and/or severe neglect to the DA's Office, Sheriff's Office and other law enforcement agencies.</p>	<p>H. (1) Maintained</p>	<p>H. (1) Maintained See above.</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
H. (2) CWS shall make cross-reports to the DA's office in accordance with Penal Code section 11166, subdivision (j).	June 14, 2018 and ongoing	H. (2) Completed 6/4/18 CWS' electronic cross reporting system automatically sends a copy of cross reports to law enforcement to the Humboldt County DA's Office.	H. (2) Maintained	H. (2) Maintained
H. (3) The social worker shall document in (CWS/CMS or any future successor system) the date, time, and manner of the cross-report, as well as any follow up information relating to the receiving agency's response.	June 14, 2018 and ongoing	H. (3) Completed 6/4/18 CWS' electronic cross reporting system automatically sends a copy of cross reports to law enforcement to the Humboldt County DA's Office.	H. (3) Maintained	H. (3) Maintained
H. (4) On a weekly basis, a supervisor shall review all reports to ensure that timely cross-reporting has been completed.	June 14, 2018 and ongoing	H. (4) Completed 4/23/18 A CWS Program Manager reviews all cross reports for timeliness.	H. (4) Maintained	H. (4) Maintained
H. (5) For reports that are assigned for investigation and a joint response with the Sheriff's Office is necessary, the assigned social worker shall contact the Sheriff's Office immediately if it involves an emergency or 24-hour response, and within 36 hours if it involves a 10-day response.	June 14, 2018 and ongoing	H. (5) Completed policy development 6/4/18 CWS' CWS/CMS system captures data the investigator enters regarding contact with the Sheriff's Office.	H. (5) Implementation Incomplete QA steps are needed to ensure these practices.	H. (5) Maintained QA steps are needed to ensure these practices. CSSP will collect data and report on joint response practice in the subsequent report.

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
I. CWS may not refuse to accept reports from any person, whether or not that person is a mandated or non-mandated reporter, including reports that fall outside its geographical jurisdiction.	June 14, 2018 and ongoing	I. Completed 3/29/18 CWS reports not refusing to handle reports, including those which fall outside its geographical jurisdiction.	I. Maintained	I. Maintained <i>See Recommendation 3. Of this report: Have managers perform QA reviews on a set number of intake reports each month.</i>
I. (1) For reports that fall outside CWS's geographical jurisdiction, CWS shall: I. (1) a. Immediately electronically transfer the call to the appropriate agency; or I. (1) b. If CWS takes the report and cannot immediately transfer the call, it shall immediately send the report via telephone, fax, or electronic transmission to the appropriate agency, with an immediate follow up call to the agency to ensure that the report is received.	June 14, 2018 and ongoing	I. (1) a.-b. Completed 3/29/18 CWS transfers calls to appropriate agencies or sent reports by phone, fax, or electronic transmission to the appropriate agency.	I. (1) a.-b. Maintained	I. (1) a.-b. Maintained
I. (2) For cross-reports that come from the Sheriff's Office or any agency that falls outside CWS's geographical jurisdiction, CWS shall: I. (2) a. Immediately transfer the report via telephone, fax, or electronic transmission to the appropriate agency, with an immediate follow up call to the agency to ensure that the report is received; and I. (2) b. Immediately call the reporting agency to inform it that the report is outside the jurisdiction of CWS and to which agency it has transferred the report.	June 14, 2018 and ongoing	I. (2) a.-b. Completed 3/29/18 CWS reports immediate transfer of out of jurisdiction reports and calling reporting agency to inform of actions.	I. (2) a.-b. Maintained	I. (2) a.-b. Maintained
J. CWS shall revise its policies and procedures to incorporate the following and circulate copies of the following DSS All-County Letters to all employees.				

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>J. (1) All-County Letter No. 05-09, dated April 26, 2005, regarding Reporting and Investigation Requirements for Child Abuse Allegations Regarding Children in Out-Of-Home Placements, available at www.cdss.ca.gov/lettersnotices/entres/getinfo/acl05/pclf/05-09.pdf</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</p>	<p>J. (1) Completed 6/26/18 CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases circulated to staff.</p>		
<p>J. (2) All-County Letter No. 17-27, dated May 10, 2017, regarding Investigating, Assessing, and Documenting a New Referral of Child Abuse or Neglect in an Open Investigation or Case, available at http://www.cdss.ca.gov/Portals/9/ACL/2017/17-27.pdf; and</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</p>	<p>J. (2) Completed 6/26/18 CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases was circulated to staff on 6/26/18.</p>		
<p>J. (3) CANRA's implementing regulations relating to investigations of suspected child abuse in out-of-home care facilities set forth under California Code of Regulations, Title II, division 1, chapter 9, article 3 (11 C.C.R. § 930 et seq.).</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</p>	<p>J. (3) Completed 6/26/18 CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases was circulated to staff on 6/26/18.</p>		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>K. As set forth in Welfare & Institutions Code section 16504, CWS shall conduct a thorough evaluation of the risk to any child who is the subject of a referral. The evaluation of risk shall include information gathered from all collateral contacts who may have relevant information related to the referral. Collateral contacts may include (but are not limited to) school personnel, law enforcement, tribal representatives, medical personnel, and other community members. When necessary to complete the evaluation of risk to the child, the investigating social worker will contact the reporting party (whether mandated or not) for further information. Consistent with Division 31 regulations, section 31-105 .1.11.114, CWS screeners and investigators shall record detailed information (as available) regarding any contact with collateral contracts, which may include the (1) date of contact; (2) name and phone number of each person contacted; (3) agency affiliation or person's relationship to the child; (4) contacts with tribe(s), extended family, Indian organizations, other Indian service providers; and (5) summary of information obtained. The use of all collateral contacts and other available resources should also be used to obtain information related to the location of children and families who are the subject of referrals, consistent with DSS All County Information Notice No. I-52-14, available at http://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acin/2014/I-52_14.pdf</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</p>	<p>K. Partially Completed CWS developed Intake policy and procedures and circulated to staff on 6/26/18.</p> <p>CWS expects to circulate Investigations policy and procedures by 12/14/18.</p>	<p>K. Completed policy development</p> <p>Implementation Incomplete CWS 18-20 Investigations policy and procedures was distributed on 12/14/18.</p> <p>Steps are needed to verify adherence to policy.</p>	<p>K. Implementation Incomplete</p> <p>Steps are needed to verify adherence to policy.</p> <p>Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations.</p> <p>See Recommendation 2. of this report: <i>Implement quality assurance activities at intake to support supervisors in reviewing each report to the hotline.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>L. To the extent permitted pursuant to Welfare and Institutions Code section 827, CWS shall create a policy that investigating social workers respond back (in writing or via telephone) to mandated reporters by the end of an investigation of a referral regarding the status of the referral. If the communication is made via telephone, the social worker shall document the time and date of the communication.</p>	<p>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</p>	<p>L. Completed 6/26/18 CWS circulated Mandated Reporter policy and procedures; informing mandated reporters of the status of a referral will also be addressed in the Investigations policy expected to be circulated by 12/14/18.</p>	<p>L. Completed CWS 18-20 Investigations policy and procedures on 12/14/18.</p>	<p>L. Completed CWS documented sending a response for 1,214 (97%) of the 1,252 reports received from a mandated reporter: 1,207 written and seven telephone or in-person). For the additional 38 reports there was no documentation of a response.</p>
<p>M. In consultation with the parties' agreed-upon expert consultant, National Council on Crime and Delinquency-Children's Research Center ("NCCD"), CWS shall select and implement a family meeting model that uses a strength-based approach to engage families, formal and informal supports, communities, and tribes in a family-led planning process over the life of cases at key decision points. The model shall include a combination of family meeting types that encompass the core elements outlined in best practices, such as pre-meeting coordination and preparation, consensus-based decision-making, and family team involvement in creating plans and follow-up activities.</p>	<p>June 14, 2018</p>	<p>M. Completed training and policy development, 6/26/18 CWS uses Child and Family Team meetings in their work with families on a regular basis. NCCD provided refresher training sessions on Child and Family Teams meetings and updated Policy and Procedure was created and distributed to staff on 6/26/18.</p>	<p>M. Implementation Incomplete There is no data on assessment of implementation.</p>	<p>M. Implementation Incomplete There is no data on assessment of implementation.</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Tribal Collaboration				
<p>N. CWS shall revise its policies and procedures to ensure collaboration with and input relating to decision-making from tribes.</p>	<p>June 14, 2018, extended to August 24, 1018 by the Office of the Attorney General per request made by CWS. Ongoing</p>	<p>N. Not Completed CWS began consultation with tribes in June 2018 on policies and procedures requiring tribal input and expects to (re) circulate policies and procedures by 12/31/18.</p>	<p>N. Completed Policy Development; Implementation Incomplete CWS completed the process of gaining input on policies from tribes on 11/30/18. Efforts are needed to ensure expected practices.</p>	<p>N. Implementation Incomplete Efforts are needed to ensure expected practices.</p> <p><i>See Recommendation 10 of this report: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i></p> <p><i>See Recommendation 12 of this report: Actively plan with tribes for ICWA programming, as announced and promised.</i></p> <p><i>See Recommendation 13. of this report. Continue to work actively with the Tribal consultant to negotiate tribal protocols/MOUs.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>N. (1) Upon receipt of a referral that involves a child who is a member of or eligible for membership in a tribe, the social worker screener shall send the referral to the appropriate tribe within 24 hours in order to seek input from the tribe, unless an immediate or 23-hours response is needed, in which case the screener shall contact the tribe immediately or as soon as practicably possible.</p>	<p>June 14, 2018, extended to August 24, 1018 by the Office of the Attorney General per request made by CWS. Ongoing</p>	<p>N. (1) Not Completed Intake policy and procedures to be updated with tribal input by 10/12/18.</p>	<p>N. (1) Completed Policy Development; Implementation Incomplete CWS updated Intake policy and procedures with tribal input. 10/12/18. Efforts are needed to ensure expected practices.</p>	<p>N. (1) Implementation Incomplete Efforts are needed to ensure expected practices.</p> <p><i>See Recommendation 10 of this report: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i></p> <p><i>See Recommendation 12. of this report: Actively plan with tribes for ICWA programming, as announced and promised.</i></p> <p><i>See Recommendation 13. of this report: Continue to work actively with the Tribal consultant to negotiate tribal protocols/MOUs.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>N. (1) a. The screener shall document details of that contact in the screener narrative, including whether contact was made, input was sought, and the input from the tribe, if any, including the dates and times of such contact.</p>	<p>June 14, 2018, extended to August 24, 1018 by the Office of the Attorney General per request made by CWS. Ongoing</p>	<p>N. (1) a. Not Completed Intake policy and procedures to be updated with tribal input by 10/12/18.</p>	<p>N. (1) a. Completed Policy Development; Implementation Incomplete CWS updated Intake policy and procedures with tribal input on 10/12/18. Efforts are needed to ensure expected practices.</p>	<p>N. (1) a. Implementation Incomplete Efforts are needed to ensure expected practices.</p>
<p>N. (2) For the referrals that are assigned for investigation, CWS shall provide tribal representatives sufficient notice to allow such representatives to accompany CWS social workers to investigations to ensure that such representatives are included in decision-making relating to those referrals.</p>	<p>June 14, 2018, extended to August 24, 1018 by the Office of the Attorney General per request made by CWS. Ongoing</p>	<p>N. (2) Not Completed To be included in Investigation policy and procedures expected to be finalized by 12/31/18.</p>	<p>N. (2) Completed Policy Development; Implementation Incomplete CWS updated Investigation policy and procedures with tribal input. Efforts needed to ensure expected practices.</p>	<p>N. (2) Implementation Incomplete Efforts needed to ensure expected practices.</p>
<p>O. Within 60 days of the entry of Judgment, in consultation with tribal representatives and the Attorney General's Office, CWS shall engage a qualified, independent tribal consultant, who is subject to the Attorney General's Office's approval, to work with staff and NCCD to assist with the implementation of policies and procedures relating to collaboration between tribes and CWS social workers with respect to the assessment and investigation of referrals, and addressing the needs of tribal children.</p>	<p>April 14, 2018 Ongoing</p>	<p>O. Completed 4/5/18 DHHS/CWS committed to contracting with tribal consultant, Olin Jones in April 2018, and entered into a contract with Olin Jones on July 10, 2018.</p>	<p>O. Maintained</p>	<p>O. Maintained <i>See Recommendation 13. of this report: Continue to work actively with the Tribal consultant to negotiate tribal protocols/MOUs.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>P. Within nine months of the entry of Judgment, CWS shall make a good-faith effort to negotiate and develop protocols with the eight federally recognized tribes in Humboldt County governing the process for collaboration that will ensure timely, shared decision-making relating to cases involving tribal children. These protocols shall include a mutually acceptable procedure for the resolution of disputes when tribal social workers and CWS are not in agreement regarding case plan decisions.</p>	<p>November 14, 2018</p>	<p>P. In Process Tribal consultant Olin Jones has met regularly with CWS and tribal representatives to identify priorities and begin to draft protocols.</p>	<p>P. In Process Tribal consultant Olin Jones has assisted in the development of a protocol/MOU between Humboldt County and the Hoopa Valley tribe and continues to work to draft additional protocols.</p>	<p>P. In Process Tribal consultant Olin Jones continues to assist in developed of protocols/MOUs between Humboldt County and tribes.</p>
Revision of Policies and Procedures by Defendant Sheriff's Office				
<p>Q. Within 30 days of the entry of Judgment, the Sheriff's Office shall incorporate the requirements set forth below in this section into its policies and procedures and circulate to all personnel.</p>	<p>March 15, 2018</p>	<p>Q. Completed 3/14/18 The Sheriff's Office updated policies and procedures to reflect requirements in this this section and distributed to staff.</p>		
<p>R. The Sheriff's Office shall ensure compliance with CANRA, including the confidentiality requirements set forth under Penal Code section 11167, and implementing regulations set forth in California Code of Regulations, Title II, division 1, chapter 9 (11 C.C.R. §900 et seq.), including regulations relating to investigations of suspected child abuse in out-of-home care facilities.</p>	<p>March 15, 2018 and ongoing</p>	<p>R. Completed 3/14/18 Expectations were issued to staff in child abuse and child and adult dependent safety policies on: 1. Confidentiality requirements set forth under Penal Code section 11167, and 2. Implementing regulations set forth in California Code of Regulations, Title II, division 1, chapter 9 (11 C.C.R. §900 et seq.), including regulations relating to investigations of suspected child abuse in out-of-home care facilities.</p>	<p>R. Maintained CSSP interviewed three staff hired or promoted during MP1. They each had a thorough grasp of policies and expectations.</p>	<p>R. Maintained Efforts are needed to ensure expected practices.</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
S. The Sheriff's Office shall ensure timely cross-reporting to CWS and DA's office.	March 15, 2018 and ongoing	S. Completed 3/14/18 Expectations were issued to staff in Child Abuse policy. The Sheriff's Office has provided training and implemented a weekly review process to ensure timely cross reporting.	S. Maintained HCSO continues to report a weekly review process to ensure timely cross reporting.	S. Maintained HCSO continues to report a weekly review process to ensure timely cross reporting.
T. Upon receipt of a report, a Deputy (or designee) shall immediately or as soon as practicably possible cross-report by telephone to CWS and make a follow up written report to CWS as required by CANRA.	March 15, 2018 and ongoing	T. Completed 3/14/18 Expectations were issued to staff in Child Abuse policy: upon receipt of report, cross report by telephone and in writing.	T. Maintained	
U. The Sheriff's Office shall make cross-reports to the DA's office in accordance with Penal Code section 11166, subdivision (k).	March 15, 2018 and ongoing	U. Completed 3/14/18 Expectations were issued to staff in Child Abuse policy.	U. Maintained	
V. If there is a call for service unrelated to suspected or known child abuse or neglect, but the Deputy becomes aware of such a situation during an investigation or otherwise, the Deputy shall immediately or as soon as practicably possible call CWS to make a report and send a follow up written report to CWS. The Deputy shall coordinate an investigative response with CWS to the extent appropriate.	March 15, 2018 and ongoing	V. Completed 3/14/18 HCSO reports to CWS as soon as aware of child abuse/neglect situation and follow-up in writing.	V. Maintained	
W. The Sheriff's Office shall revise its Domestic Violence policy to address situations in which a child (or children) is in the home, and the reporting to CWS thereof.	March 15, 2018	W. Completed HCSO updated Domestic Violence policy to address child involvement and report to CWS.		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>X. The Sheriff's Office shall ensure that every single report and cross-report is promptly assigned a Deputy, an investigation is conducted, and a case report is report is completed. All reports and cross-reports shall be assigned as a "call for services."</p>	<p>March 15, 2018 and ongoing</p>	<p>X. Completed 3/14/18 HCSO ensures that cross reports are assigned for service.</p>	<p>X. Maintained CSSP has reviewed HCSO data which reflects these practices.</p>	<p>X. Maintained CSSP has reviewed HCSO data which reflects these practices.</p>
<p>X. (1) On a weekly basis, the Sheriff's Office's CANRA Coordinator shall review all "calls for service" relating to reports and cross reports to ensure that the coordination with appropriate agencies has been made, deputies have been assigned, and investigations are underway.</p>	<p>March 15, 2018 and ongoing</p>	<p>X. (1) Completed 3/14/18 HCSO reports a weekly review of cross reports.</p>	<p>X. (1) Maintained CSSP has reviewed HCSO data which reflects these practices.</p>	<p>X. Maintained CSSP has reviewed HCSO data reflects these practices.</p>
<p>X. (2) An assigned Deputy shall coordinate an investigative response with CWS immediately it involves an emergency or 24-hour response. For all other responses, a Deputy shall be assigned to investigate the allegations within 72 hours of receipt and report to CWS and/or other appropriate agencies that the Sheriff's Office is investigating within 36 hours after starting its investigation.</p>	<p>March 15, 2018 and ongoing</p>	<p>X. (2) Completed 3/14/18 HCSO and CWS CANRA Coordinators track referrals and cross reports to ensure joint work.</p>	<p>X. (2) Maintained Expectations for these practices continue. Efforts are needed to understand coordination across agencies.</p>	<p>X. (2) Maintained Expectations for these practices continue. CSSP will collect data and report on joint response practice in the subsequent report.</p>
<p>Y. The Sheriff s Office may not refuse to accept reports from mandated reporters or other reporters, including reports that fall outsides its geographical jurisdiction.</p>	<p>March 15, 2018 and ongoing</p>	<p>Y. Completed 3/15/18 HCSO reports not refusing to handle reports, even those which fall outside its geographical jurisdiction.</p>	<p>Y. Maintained</p>	<p>Y. Maintained</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>Y. (1) For reports that fall outside the Sheriff s Office's geographical jurisdiction, the Sheriff s Office shall: a. Immediately electronically transfer the call to the appropriate law enforcement agency; or</p>	<p>March 15, 2018 and ongoing</p>	<p>Y. (1) a. Completed 3/15/18 HCSO reports transferring calls to appropriate agency.</p>	<p>Y. (1) a. Maintained</p>	<p>Y. (1) a. Maintained</p>
<p>Y. (1) b. If the Sheriff s Office takes the report and cannot immediately transfer the call, it shall immediately send the report via telephone, fax, or electronic transmission to the appropriate agency, with an immediate follow up call to the agency to ensure that the report is received.</p>	<p>March 15, 2018 and ongoing</p>	<p>Y. (1) b. Completed 3/15/18 If HCSO cannot transfer, reports are sent to the appropriate agency.</p>	<p>Y. (1) b. Maintained</p>	<p>Y. (1) b. Maintained</p>
<p>Y. (2) For cross-reports that come from CWS that fall outside the Sheriff s Office's geographical jurisdiction, the Sheriff s Office shall: a. Immediately transfer the report via telephone, fax, or electronic transmission to the appropriate agency to ensure that the report is received; and</p>	<p>March 15, 2018 and ongoing</p>	<p>Y. (2) a. Completed 3/15/18 HCSO handles cross-reports from CWS that are outside jurisdiction by transferring to appropriate agency and following-up with call to appropriate agency.</p>	<p>Y. (2) a. Maintained</p>	<p>Y. (2) a. Maintained</p>
<p>Y. (2) b. Immediately call CWS to inform CWS that the report is outside of the jurisdiction of the Sheriff s Office and to which agency it has transferred the report.</p>		<p>Y. (2) b. Completed 3/15/18 Handling of cross-reports from CWS outside jurisdiction, after transferring to appropriate agency, follow-up with call to appropriate agency and notify CWS.</p>	<p>Y. (2) b. Maintained</p>	<p>Y. (2) b. Maintained</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Electronic Records and Tracking				
Z. Within 45 days of the entry of Judgment, Defendant CWS shall create an internal tracking tool for reports and cross-reports. CWS shall maintain an electronic record of all reports and cross-reports received, including any subsequent actions taken.	March 30, 2018 and ongoing	Z. Completed 3/25/18 CWS - Creation of internal system for cross-reports.	Z. Maintained	Z. Maintained
AA. Within 45 days of the entry of Judgment, Defendant Sheriff's Office shall create and internal tracking tool for reports and cross-reports. The Sheriff's Office shall maintain an electronic record of all cross reports received, including and subsequent actions taken.	March 30, 2018 and ongoing	AA. Completed Sheriff's Office created an internal system for tracking cross-reports.	AA. Maintained HCSO continues to maintain an electronic system of reports and cross reports received and made and subsequent actions taken.	AA. Maintained HCSO continues to maintain an electronic system of reports and cross reports received and made and subsequent actions taken.
AA. (1) The Sheriff's Office shall retain and categorize reports in its Records Management System ("RMS"). Any supplemental information received from CWS and other agencies or persons relating to a report, including follow-up reports, documentation, or cross-reports, shall be electronically included in the case file in RMS. The case file shall include detailed information about the method and dates of making and receiving cross-reports, as well as information about the investigator's response by each agency.	March 30, 2018 and ongoing	AA. (1) Completed Retain, categorize, and update reports in RMS.	AA. (1) Maintained	AA. (1) Maintained

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
AA. (2) Reports that fall outside the geographical jurisdiction of the Sheriff's Office shall be tracked electronically. The records of such reports shall include the date, time method of transfer, and to which agency the report was transferred.		AA. (2) Completed HCSO tracks reports which fall outside jurisdiction.	AA. (2). Maintained 24 reports received, tracked, and forwarded to the appropriate agency during reporting period.	AA. (2) Maintained Xx reports received, tracked, and forwarded to the appropriate agency.
Contract between Defendant CWS and NCCD				
BB. CWS has entered into a two-year contract with NCCD effective June 30, 2017 to provide for training and technical assistance relating to the following subject areas to address the issues in this matter: (1) Structured Decision-Making ("SDM") System, Practice Improvement Activities, which includes, but is not limited to: a. Group supervision training and modeling for staff; b. SDM training and on the floor coaching for all stages of services, beginning with hotline procedures; and c. Case reading training for supervisors and managers.	June 30, 2019 and ongoing	BB. (1) a.-d. Completed NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (1) a.-d. Completed NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (1) a.-d. Completed <i>NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.</i> <i>See Recommendation 2. of this report: Implement quality assurance activities at intake to support supervisors in reviewing each report to the hotline.</i> <i>See Recommendation 6 of this report: Require supervisors to conduct monthly reviews of at least one case per social worker per month.</i>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>BB. (2) Culturally Responsive Services, which includes, but is not limited to:</p> <ul style="list-style-type: none"> a. Leadership coaching in the Humboldt Practice Model and Safety Organized Practice, including individual coaching sessions and trainings; b. Teaching effective communication skills for use internally and in collaboration with partner agencies; c. Providing implementation consultation regarding pre-implementation, implementation, and sustainability planning activities of the Humboldt Practice Model; and d. Developing a common language that facilitates effective cross-cultural communication. 	<p>June 30, 2019 and ongoing</p>	<p>BB. (2) a.-d. Completed NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.</p>	<p>BB. (2) a.-d. Maintained NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.</p>	
<p>CC. Within 30 days of the entry of Judgment, CWS shall amend the contract with NCCD to provide for the following additional services and amend the term of the contract from a two-year to three-year period. CWS shall provide the Attorney General's Office with a copy of the amended executed contract within five days of the date of the last signature.</p> <ul style="list-style-type: none"> (1) Assistance with revision of policies and procedures. (2) Additional training and coaching in SDM implementation and safety organized practice, including review of procedures for screening reports relating to sexual abuse allegations, to ensure that the SDM screening tools are being used appropriately across all referrals. (3) Workload Study in order to estimate the resources and number of staff members needed to perform the necessary functions of the child welfare agency in compliance with laws, rules, and policies applicable to Humboldt County. (4) Manage by data assistance, including bolstering continuous quality improvement processes, leveraging data resources, and analytic support to improve agency practices. 	<p>March 15, 2018 and ongoing</p>	<p>CC. (1) – (7) Completed contract 2/27/18 CWS amended its contract with NCCD to provide for additional services and amended the term of the contract from a two-year to three-year period. CWS provided the Attorney General's Office with a copy of CWS' amended executed contract with NCCD.</p>	<p>CC. (1) – (7) In process: (2), (3), and (7) NCCD completed work on mapping decision making post investigation, provided coaching in SDM implementation and introduced the workload study to leadership, who asked for a delay in implementation, given other work underway. Work on the mandated reporter guide is in underway.</p>	<p>CC. (1) -(7) In process: (2), (3), and (7) <i>NCCD provided coaching in SDM implementation and safety organized practice and began to plan for the workload study.</i></p> <p><i>CWS must work on managing by data, implement CQI structures, and integrate tribal needs into system improvement.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>(5) Business Process Map to understand how cases of maltreatment are handled across the course of a case and what happens at each decision point in order to identify roadblocks, inefficiencies, and needs to enable fidelity to best practice.</p> <p>(6) Integration of tribal needs into system improvement, including building on the culturally responsive services training to identify and implement changes to practice that integrate tribal needs and perspectives into the CWS system to ensure that interactions and work with tribes is culturally responsive.</p> <p>(7) Assistance with the development of a Mandated Reporter Guide, as detailed in Section KK (l).</p>				<p><i>See Recommendation 3. Of this report: Have managers perform QA reviews on a set number of intake reports each month;</i></p> <p><i>See Recommendation 4.: Continue efforts to fill vacancies and increase staffing; and</i></p> <p><i>See Recommendation 10 of this report: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i></p> <p><i>See Recommendation 14. of this report: Implement multiple measures to understand the impact of and experiences with CFT meetings and better support staff and families as they participate in CFT meetings and implement, track, and modify plans created during meetings.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
				<i>See Recommendation 15. of this report: Create an agency wide CQI program.</i>
CC. (8) Creation and implementation of plans to address outstanding, backlogged investigations to ensure that all referrals are investigated.	March 15, 2018 and ongoing, as needed	CC. (8) Completed With TA from NCCD, CWS implemented plans to complete backlogged investigations.	CC. (8) Maintained With TA from NCCD, CWS implemented plans to complete backlogged investigations.	CC. (8) Maintained CWS implemented a plan to complete backlogged investigations. <i>See Recommendation 5. of this report: Support investigators in continuing to make timely contacts with children, their caretakers, and others who may inform the investigation, and making timely entries CWS/CMS.</i> See Recommendation 7. of this report: Track time to completion of investigations by social worker and supervisor.
CC. (8) a. CWS shall work with NCCD to create a plan to triage outstanding investigations, which may include the hiring of temporary employees. The triaging plan shall be completed and action initiated within 60 days of the amendment of the contract.	April 28, 2018 and ongoing, as needed	CC. (8) a. Completed CWS implemented plans to complete backlogged investigations.		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>CC. (8) b. CWS shall work with NCCD to create a time management plan that ensures new investigations are completed in a timely manner as CWS is addressing backlogged investigations. This may include revisions to policies and procedures, training to better utilize SafeMeasures®, or other strategies. The time management plan shall be completed and action initiated within 60 days of the amendment of the contract.</p>	<p>April 28, 2018 and ongoing, as needed</p>	<p>CC. (8) b. Completed CWS implemented plans to complete outstanding investigations.</p>	<p>CC. (8) b. Maintained</p>	
<p>CC, (8) c. CWS shall complete at least 30% of outstanding investigations every quarter. CWS shall close or finalize all of the outstanding investigations within one year of the entry of Judgment.</p>	<p>February 13, 2019</p>	<p>CC. (8) c. In Process CWS has exceeded the goal of closing 30% of backlogged investigations each quarter, reducing the backlog from 293 in February 2018 to 60 on August 13, 2018.</p>	<p>CC. (8) c. Completed, 2/12/19 CWS eliminated the backlog of 293 investigations as of February 12, 2019.</p>	<p><i>See Recommendation 8. of this report: Create a plan on how to sustain the progress on the backlog reduction and to determine investigations that legitimately reflect a need to maintain an open file.</i></p>
<p>CC. (8) d. For new investigations, CWS shall improve its investigation completion rate every quarter and achieve compliance with the statutory investigation completion requirement within one year of the Judgment.</p>	<p>February 13, 2019</p>	<p>CC. (8) d. Not Completed The backlog of investigations was 168 on September 12, 2018.</p>	<p>CC. (8) d. Not Completed The backlog of investigations was 191 on February 28, 2019.</p>	<p>CC. (8) d. Not Completed The backlog of investigations was 62 on August 31, 2019.</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Training				
<p>EE. In addition to the training provided by NCCD to Defendant CWS under the contract described in Sections BB and CC, training of CWS employees on subject matters (1) and (2) below has begun and is ongoing. Within 180 days of the entry of Judgment, CWS shall have completed mandatory training to all employees on the following subject matters:</p> <p>(1) The requirements of CANRA and the Welfare & Institutions Code, including the legal obligations of CWS and confidentiality requirements;</p>	August 12, 2018	EE. (1) Completed 8/9/18		
<p>EE. (2) Procedures relating to documenting referral and case information into (CWS/CMS), including detailed information relating to cross-reporting and contact with tribes; and</p>	August 12, 2018	EE. (2) Completed 8/9/18		
<p>EE. (3) The revised policies and procedures that CWS is required to implement pursuant to the Judgment.</p>	August 12, 2018	<p>EE. (3) Not Completed CWS has not finalized policies with input from Tribes and the Community Task Force. CWS has not circulated Investigations policy to staff.</p>	<p>EE. (3) Completed 12/14/18 CWS circulated policies on that incorporated tribal input.</p>	
<p>EE. (4) Prior to the 180-day timeframe for completion of the above trainings, CWS shall, on a monthly basis, provide the Attorney General's Office with a list of trainings provided to and completed by employees.</p>	Monthly from August 13, 2018	<p>EE. (4) Completed The AG advised CWS to submit training provided and completed by employees directly to CSSP. CSSP received training list on August 10, 2018.</p>		

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>EE. (5) Training shall be conducted at least annually on the above subject matters and participation shall be tracked. Any newly hired or assigned personnel shall be required to attend such training within 30 days of hire or assignment.</p>	<p>Annually, August and ongoing (for new hires)</p>	<p>EE. (5) Partially Completed CWS provided training on WIC, CANRA, accepting reports, and cross reporting.</p> <p>Policies and procedures, and therefore related training, have not yet been finalized.</p>	<p>EE. (5) Completed CWS reports discussion of policies and procedures during group and individual meetings with supervisors and program meetings. CWS is not planning training classes of other sessions on policies and procedures for current staff.</p>	<p>EE. (5) Completed New and ongoing staff have participated in sessions on CANRA, WIC, and policies.</p>
<p>FF. Defendant Sheriff’s Office shall provide annual mandatory training for its deputies and records personnel on the following subject matters:</p> <p>(1) Requirements of CANRA, including the legal obligations of the Sheriff’s Office and confidentiality requirements;</p> <p>(2) Handling investigations relating to child abuse and neglect;</p> <p>(3) The revised policies and procedures that the Sheriff’s Office is required to implement pursuant to the Judgment; and</p> <p>(4) Trauma-informed practices relating to interviews of children.</p>	<p>Annually, August</p>	<p>FF. (1)-(4) Completed March 2018</p>	<p>FF. (1)-(4) Maintained</p>	<p>FF. (1)-(4) Not Completed HCSO reports providing annual training to all but 20 staff by August 31, 2019.⁷¹</p>
<p>FF. (5) Training participation shall be tracked. New deputies shall complete the training as part of their four-month Field Training Officer (FTO) Program. Lateral transfers shall be provided such training during the Field Training Program. New records personnel hires shall be required to attend such training within 30 days of hire.</p>	<p>Ongoing</p>	<p>FF. (5) Completed</p>	<p>FF. (5) Maintained</p>	<p>FF. (5) Maintained</p>

⁷¹ HCSO reports all staff, except two on extended medical leave, completed annual CANRA training by November 14, 2019.

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Complaint Systems				
<p>GG. Within 60 days of the entry of Judgment, Defendant CWS shall create a complaint procedure that can be easily understood by and publicized to the community. This procedure shall include the timeframe for handling complaints submitted formally and informally, written and orally. CWS shall create a policy designating a supervisor who will be responsible for ensuring all complaints are investigated.</p>	<p>April 15, 2018 and ongoing</p>	<p>GG. Completed 4/13/18 CWS opened an Office of the Ombudsperson with an assigned supervisor “to provide independent review of questions and concerns related to CWS practices.”⁷²</p>	<p>GG. Ongoing CWS continues to operate the Office of the Ombudsperson which received 63 complaints between 9/1/18 – 2/28/19.</p>	<p>GG. Ongoing CWS continues to operate the Office of the Ombudsperson which received 110 complaints between 3/1/19 – 8/31/19.</p>
<p>HH. Defendant Sheriff’s Office's Policy 1020 relates to complaints. Within 60 days of the entry of Judgment, the Sheriff’s Office shall revise Policy 1020.5 to require that all formal and informal complaints and inquiries that relate to child abuse or neglect issues be categorized as "CANRA" so that such complaints can be tracked to ensure they are being addressed in accordance with Policy 1020 and this Judgment.</p>	<p>April 15, 2018 and ongoing</p>	<p>HH. Completed 3/14/18 HCSO updated policy (now 920) and the CANRA Coordinator is assigned to handle and track policy procedural complaints related to CANRA. Arthur, Gayle: insert text regarding new staff training.</p>	<p>HH. Maintained HCSO received 3 inquiries related to child abuse and neglect investigations.</p>	<p>HH. Maintained HCSO reports receiving no complaints or inquiries related to child abuse and neglect investigations.</p>

⁷² <https://humboldt.gov.org/DocumentCenter/View/63519/20180413-CWSOmbudsperson?bidId=>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Community Task Force ("Task Force")				
<p>II. Within 120 days of the entry of Judgment, the Humboldt County Sheriff and Director of DHHS ("Director") shall create a Task Force consisting of internal and external stakeholders for the purpose of making recommendations to their respective departments. The Sheriff and Director shall invite community members and representatives from the following agencies or departments to participate in the Task Force, however, membership is not limited to these entities: (1) School districts (2) Humboldt County Office of Education (3) Humboldt County Probation Department (4) DHHS, Mental Health division (5) Local law enforcement agencies (6) Tribes (7) Medical providers, specifically pediatricians and/or representatives from the local children's hospital.</p>	<p>June 14, 2018 and ongoing</p>	<p>II. Completed 5/24/18 First Community Task Force Meeting held May 24, 2018 by Humboldt County Sheriff's Office and Department of Health and Human Services. Two meetings held since then during this monitoring period.</p>	<p>II. Maintained The monitor continues to observe Task Force meetings.</p>	
<p>JJ. The Task Force shall meet on a quarterly basis to discuss issues relating to CANRA, child abuse and neglect, and child welfare within Humboldt County.</p>	<p>June 14, 2018 and ongoing</p>	<p>JJ. Completed 5/24/18 – 8/31/18 Community Task Force meetings were held 5/24/18, 6/21/18, and 7/26/18.</p>	<p>JJ. Maintained Community Task Force meetings were held 9/13/18 and 1/24/19.</p>	<p>JJ. Maintained Community Task Force meetings were held 3/28/19, 5/23/19, and 8/15/19.</p> <p>See Recommendation 17. of this report: Share the results of DHHS' review of the Ombudsperson's Office with the Community Task Force.</p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>KK. The duties of the Task Force shall generally include: (1) Creation of a web-based Mandated Reporter Guide, which provides an overview of CANRA and the Welfare & Institutions Code, including: a. The legal obligations of each Defendant, including what types of reports fall within the respective jurisdiction of each agency; b. Policies and processes implemented by Defendants to ensure compliance with CANRA and the Welfare & Institutions Code, and any other statutes relating to the investigation of reports of child abuse and neglect; and c. The legal obligations of mandated reporters. d. A hard-copy version of the guide shall be made available.</p>	<p>June 14, 2018 and ongoing</p>	<p>KK. (1) a.-d. In Process Sub-committee formed to create the Mandated Reporter Guide with support from NCCD.</p>	<p>KK. (1) a.-d. In Process, Primarily c. The subcommittee to develop a web-based Mandated Reporter Guide continues to meet. The subcommittee plans to test the Guide by in the fall of 2019.</p>	<p>KK. (1) a.-d. In Process, Primarily, c. The subcommittee to develop a web-based Mandated Reporter Guide continues to meet.</p>
<p>KK. (2) Input on changes or revisions to policies and procedures relating to CANRA.</p>	<p>June 14, 2018 and ongoing</p>	<p>KK. (2) In Process Sub-committee formed to review and provide input.</p>	<p>KK. (2) Completed A sub-committee reviewed CWS policies and procedures and provided input.</p>	<p>KK. (2). N/A No revised policies related to CANRA presented to the Task Force.</p>
<p>KK. (3) Discussion of barriers encountered by the community and agencies with respect to CANRA and recommendations to address such barriers.</p>	<p>June 14, 2018 and ongoing</p>	<p>KK. (3) In Process Addressed through the Community Task Force and sub-committees.</p>	<p>KK. (3) In Process Addressed through the Community Task Force and sub-committees.</p>	<p><i>See Recommendation 15. of this report: Create an agency wide CQI program.</i></p>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>KK. (4) Identification of available community-based resources within Humboldt County and processes to coordinate referrals to such resources as appropriate.</p>	<p>Target not yet set</p>	<p>KK. (4) In Process Mandated Reporter Guide sub-committee has shared several resources to be included in the guide.</p>	<p>KK. (4) Maintained</p>	<p><i>See Recommendation 16. of this report: Involve youth, parents, other family members, partner agencies, tribes, Community Task Force, and other community members in designing reviews, collecting data, and analyzing data to increase accountability and transparency.</i></p>
<p>LL. By the second quarterly meeting of the Task Force, the Task Force shall create a schedule with timeframes for completion of the above duties.</p>	<p>December 2019 and ongoing</p>	<p>LL. Completed 8/7/18 The Task Force has produced a schedule with timeframes for completion of a web-based mandated reporter guide, providing input on changes or revisions to policies and procedures relating to CANRA, discussing barriers encountered by the community and agencies with respect to CANRA and recommendations to address such barriers. The Task Force has not yet begun to identify available community-based resources within Humboldt County and processes to coordinate referrals to such resources.</p>	<p>LL. Maintained</p>	

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
<p>MM. The Task Force shall provide the monitor, the Sheriff, and Director the schedule created pursuant to the above. Within 35 days of each meeting, the Sheriff and Director shall provide the monitor, the Attorney General's Office, and the clerk of the Humboldt County Board of Supervisors with the minutes from the meeting, as well as any documents, including the schedule created pursuant to Section LL.</p>	<p>June 14, 2018 and ongoing</p>	<p>MM. Completed Minutes and documents have been sent to the monitor within the 35-day timeframe for 2 of the 3 meetings held during MP1. Community Task Force Meetings can be found on the Community Task Force website.⁷³</p>	<p>MM. Maintained Minutes and documents have been sent to the monitor within the 35-day timeframe for meetings held during MP2. Community Task Force Meetings can be found on the Community Task Force website.</p>	<p>MM. Maintained Minutes and documents have been sent to the monitor within the 35-day timeframe for meetings held during MP2. Community Task Force Meetings can be found on the Community Task Force website.</p>

⁷³ <https://humboldt.gov.org/2373/Community-Task-Force>

Required Corrective Actions	Final Target	2/14/18 – 8/31/18 Performance	9/1/18-2/28/19 Performance	3/1/19-8/31/19 Performance
Compliance Monitor				
<p>4. This Judgment shall be overseen by a qualified third-party compliance monitor who shall be provided access to information and documents to ensure compliance with the injunctive provisions of this Judgment. Defendants shall retain the monitor, subject to approval by the Attorney General's Office, at Defendants' expense. Within 15 days of the entry of Judgment, all parties shall meet and confer regarding the identity of the monitor and Defendants agree to give primary consideration to the Attorney General's Office's pre-approved monitor. At the sole direction of the Attorney General's Office, the monitor shall conduct a review and prepare a written report bi-annually following the date of the entry of this Judgment for a period of three years, unless time is extended pursuant to Section 9 below, in which case the monitor shall continue to provide bi-annual reports until this Judgment's enforcement period ends. The monitor's reports shall detail the monitor's findings and recommendations for corrective action, if any is required. The Attorney General's Office shall keep all written reports prepared pursuant to this paragraph confidential except as needed to enforce compliance with the Judgment or to support any other public enforcement action by the Attorney General's Office, or as otherwise required by law.</p>	<p>February 30, 2018 and ongoing</p>	<p>4. Completed All Parties met and conferred regarding the identity of the monitor and Defendants gave primary consideration to the Attorney General's Office's pre-approved monitor, the Center for the Study of Social Policy (CSSP).</p>	<p>4. Maintained</p>	<p>4. Maintained</p>

VII. Appendices

Appendix I: Glossary of Acronyms

AG – (California Office of the) Attorney General
CANRA – Child Abuse and Neglect Reporting Act
CAST – Child Abuse Services Team
CPRG – Child Protection Reporting Guide
CSSP – Center for the Study of Social Policy
CMH – (Humboldt County Department of Health and Human Services’) Children’s Mental Health
CWS – (Humboldt County Department of Health and Human Services’) Child Welfare Services
CWS/CMW – (Humboldt County Department of Health and Human Services’) Child Welfare Services/(electronic) Case Management System
DA – (Humboldt County) District Attorney
DHHS – (Humboldt County) Department of Health & Human Services
FTO – Field Training Officer
HCSO – Humboldt County Sheriff’s Office
MDT – Multidisciplinary team
MOU – Memorandum of Understanding
NCCD – National Council on Crime and Delinquency