

June 30, 2020

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
(September 1, 2019 - February 29, 2020)



**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
September 1, 2019 – February 29, 2020

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I. Background and Introduction

This is a report on the progress of Humboldt County's Department of Health & Human Services' (DHHS) Child Welfare Services (CWS) and Humboldt County's Sheriff's Office (HCSO) in completing agreed upon corrective actions to meet 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} The Judgment, dated February 13, 2018, includes a Memorandum of Understanding (MOU, Exhibit A) between DHHS and HCSO.³ This report covers performance from September 1, 2019 to February 29, 2020.

DHHS and HCSO contracted with a third-party compliance monitor, as required by the Judgment.⁴ The Center for the Study of Social Policy (CSSP) serves 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. This is CSSP's fourth bi-annual report, detailing findings and recommendations for corrective action, if any are required, as pursuant to the Court's Judgment⁶.

During this period, CSSP monitored the progress of HCSO and CWS in meeting the terms of the Judgment while HCSO and CWS built infrastructures, issued new and updated policies about expected practices, and provided training and coaching to improve the knowledge, skills, and capacities of staff. CSSP included recommendations in its third monitoring report, dated December 2019. This report references those recommendations in several sections. CSSP's recommendations relate to achieving corrective actions of the Judgment and maintaining compliance with others which have already been achieved. The recommendations reflect CSSP's ongoing assessment of a

¹ This is the fourth 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 children 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 children. More information about CSSP can be found at: www.cssp.org

⁶ CSSP has not made recommendations for additional corrective actions. Recommendations are steps to achieve outstanding corrective actions of the Judgment.

range of qualitative and quantitative data. They also reflect an effort to encourage and support HCSO and CWS in achieving and maintaining all aspects of this reform effort. CSSP's December 2019 recommendations and updates on whether they or other actions are being implemented to achieve a corrective action are presented in relevant subsections of Section IV of this report, and the Summary Table in section VI. The full list of CSSP's December 2019 recommendations with updates is Appendix A of this report.

Specifically, CSSP's 2019 recommendations focus on CWS and HCSO sustaining, ensuring, and achieving corrective actions of the Judgment by improving:

1. The screening functioning of the hotline;
2. Communication about child abuse and neglect investigations between CWS and HCSO and CWS and Tribes; and
3. Adherence to law and policy, particularly relating to collaboration with Tribes.

There were also recommendations to create a learning environment within CWS, increase accountability in response to an urgent need, and a requirement of the Judgment, to embed quality improvement activities within CWS.

The CWS Director agreed with CSSP's recommendations and saw that they aligned with areas of work planned for the agency. CWS' Director is focused on increasing performance and accountability through workforce development, programming for Tribal cases, and continuous quality improvement.

Creating methods of assuring and improving the quality of practice was already a commitment in the county's System Improvement Plan (SIP). California's 2001 Child Welfare System Improvement and Accountability Act established a process to support counties in analyzing strengths and challenges, assessing performance, and establishing plans for performance improvement. These include Peer Review, County Self-Assessment, and a SIP that guides performance improvement for four years.⁷ Therefore, actions toward implementing some of the corrective actions of the Judgment had already been planned, some since 2017, when Humboldt County developed its SIP.

CSSP prepared this report from our home offices, during an unprecedented time in world history. Individually and collectively, we are responding to a pandemic caused by the spread of a new coronavirus, COVID-19.⁸ The ongoing hard work and dedication of first responders, such as those at HCSO and CWS as well as in Tribal Social Services Departments, is further illuminated during

⁷ CA's Child Welfare Systems Improvement Act is effective 2014,
<https://www.cdss.ca.gov/cdssweb/entres/pdf/AB636.pdf>

⁸ <https://www.cdc.gov/coronavirus/2019-ncov>

this time.⁹ HCSO deputies and other essential HCSO staff continue to work, often taking substantial risks. CWS social workers are reaching children and families by telephone and video but they also continue to conduct investigations and have in-person contact with children and families, when that is warranted, while maintaining physical distance, and asking several screening questions to determine whether persons may have COVID-19 symptoms or had close contact with someone who has tested positive for the virus.¹⁰ Juvenile and Family Wellness Courts in Humboldt County also continue to function in a limited capacity, hearing some cases via telephone and video conferencing. The Superior Court of the State of California County of Humboldt restricted in-person supervised visits between parents and children in foster care with a permanency goal of reunification, later clarified the order was not final and that parties should work together to develop individualized plans for each family.¹¹ CWS provided videoconferencing capacity to staff and worked with parents and foster parents to help maintain virtual contacts with service providers and between children and their family members, teachers, or therapists.

The information contained in this report reflects the work of HCSO and CWS at a time when COVID-19 was not part of our narrative. Foundational processes put in place in the previous 18 months as a result of this Judgment placed HCSO and CWS in good standing to continue to respond to child abuse and neglect reports, including the staffing and operation of the 24-hour CWS hotline with input to the case management system and the ability to electronically notify law enforcement via an automated cross reporting system. HCSO and CWS also continue to track reports of child abuse and severe neglect to each other and other required agencies.¹²

Section II of this report – Monitoring Activities – describes CSSP’s activities to assess CWS’ and HCSO’s status in maintaining and meeting outstanding terms of the Judgment. Specific findings are in four sections:

- Section III. Summary of Performance, 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

⁹ On March 19, 2020, Humboldt County’s Health Officer issued an Order directing residents to shelter in place of residence.

¹⁰ CWS reports following guidance from the U.S. Administration for Children and Families, California’s Department of Social Services, Department of Public Health, and the California Supreme Court to limit the spread of COVID-19, while also ensuring children were safe from abuse/neglect.

¹¹ On March 20, 2020 the Superior Court of the State of California County of Humboldt issued a standing order temporarily suspending Court-ordered supervised visit between children in foster care and their parents or guardians, siblings, or others as a health protection measure. A March 30, 2020 order allowing supervised visits with precautions clarified that supervised time between parents and their children had not been uniformly suspended.

¹² CWS and HCSO report allegations of abuse and neglect to each other as well as other local, state, national, and international law enforcement agencies.

- Section VI. Summary Table of Performance on all Corrective Actions February 14, 2018 – February 29, 2020.¹³

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.

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; representatives of seven 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, Big Lagoon Rancheria, Trinidad Rancheria, Two Feathers Native American Family Services, Wiyot Tribe, and Yurok Tribe; and Humboldt County legal counsel.
- Observed National Council on Crime and Delinquency (NCCD) technical assistance sessions with CWS’ leadership and staff.^{14,15}
- Observed a meeting of CWS Emergency Response supervisors and a CWS staffing with Hoopa Tribal Social Services.
- Received and responded to complaints related to both CWS and HCSO actions and communicated with both agencies to understand and resolve the complaints.
- Communicated with and observed NCCD and the Tribal Consultant as they conducted Judgment related activities with CWS, HCSO, and local Tribes.¹⁶

¹³ Presented in six-month periods: February 2018 through August 2018; September 2018 through February 2019; March 2019 through August 2019; and September 2019 through February 2020.

¹⁴ National Council on Crime and Delinquency, NCCD: <https://www.nccdglobal.org>

¹⁵ Judgment, Sections BB., CC., & II.

¹⁶ Per section O. of the Judgment, CWS was required to engage a qualified, independent Tribal consultant to support specific Judgment related activities. Olin Jones has served as the Tribal Consultant for the duration of the post-Judgment period.

- Tracked the progress of work on three significant deliverables of the Judgment: (1) the creation of a Child Protection Reporting Guide (CPRG); (2) DHHS' report on the functioning of the CWS Ombudsperson's Office; and (3) a CWS workload study by NCCD.^{17,18}
- Released the third monitoring report to the public on December 16, 2019 and presented aspects of the report at the February 20, 2020 Humboldt County Community Task Force meeting.
- Delivered a presentation to CWS staff on the CSSP monitoring report on February 18, 2020.
- Analyzed data provided by DHHS, CWS, and HCSO.

CSSP gained access to the database of CWS' Structured Decision Making (SDM)[®] assessments in February 2020.¹⁹ This access greatly assists in reviewing case records and understanding decision making. CSSP also reviewed electronic case records in CWS/Case Management System (CMS); and accessed CWS data in SafeMeasures[®].^{20,21}

During this period, CSSP also began to draft a second sealed report to the AG, upon request, regarding an infant who died in October 2019, shortly after a CWS investigation closed, and while another CWS investigation was pending.

III. Summary of Performance

Presented below are highlights of HCSO's, DHHS' and CWS' work to maintain and fulfill corrective actions of the Judgment and continue to serve the county during this period under review.

¹⁷ Judgment Section KK. (1); web-based mandated reporter guide

¹⁸ Judgment Section CC (3).

¹⁹ SDM[®] is an NCCD model consisting of several assessment for use by child protection agencies and workers to promote safety and well-being of children: <https://www.nccdglobal.org/assessment/sdm-structured-decision-making-systems/child-welfare>

²⁰ CWS/CMS is a statewide child welfare electronic case management system.

²¹ SafeMeasures[®] is an NCCD business intelligence tool, adopted statewide. SafeMeasures[®] uses case management data, uploaded nightly, to provide agency Directors, managers, supervisors, or social workers with case-based outcomes on key performance indicators. The work of individual social workers, 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.

Maintaining a staffed 24-hour hotline

One of the achievements of CWS in the last period, which has been sustained, is ensuring that a social worker is available 24-hours a day, seven days a week for a live response to reports of alleged child abuse and/or neglect. Recently, CWS added an “administrative” telephone line to their office, so that calls unrelated to reports of neglect and/or abuse are re-routed from the hotline. This change should also further streamline the agency’s emergency response work.

HCSO and CWS responding jointly to reports of abuse or severe neglect

HCSO and CWS maintained cross reporting practices during this period, sending reports of suspected abuse and/or neglect to each other. The agencies also continue to send reports to other law enforcement agencies, as required by CANRA (CA Child Abuse and Neglect Reporting Act), and the Judgment.²² A CSSP review of CWS and HCSO January 2020 records of reports to which both agencies responded, however, shows joint responses are unlikely and no direct communication about separate contacts with children and families.

Completing timely investigations

After significantly reducing the backlog of investigations, CWS re-assigned staff, who had been dedicated to reviewing and preparing backlogged investigations for closure, to a newly created investigation unit.²³ On February 29, 2020, there were seven investigations in backlog. On June 1, 2020, CWS reported there were five investigations in backlog status. There is also increased use of requests for extension of investigations -- a review and approval process to be used by social workers and their supervisors when investigations need to go beyond the required timeframe. From September 1, 2019 to February 29, 2020, there was a request for an extension form in an average of 71 percent of investigations in backlog status. However, not all these requests were made before the 40th day of the investigation. Improvements in reducing the backlog and completing timely investigations may have been positively influenced by increases in CWS staff. CWS hired 33 employees from March to August 2019, and 31 (94%) of them were still employed with CWS, as of February 29, 2020.²⁴

Providing specialty mental health services for Tribal children and families²⁵

On February 25, 2020, DHHS’ Mental Health contracted with Two Feathers Native American Family Services, a non-profit of Big Lagoon Rancheria, to provide office and home-based therapeutic behavioral services to Tribal children and families. Two Feathers is Humboldt County’s first Native American organizational provider of specialty mental health services. The

²² Judgment Sections H. and Z.

²³ 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.

²⁴ Two of the new employees left the agency, including a social worker and an office assistant for reasons unrelated to their experiences with the agency.

²⁵ While this important step is not part of the Judgment, it could help in furthering the County’s work with Tribes and their children.

contract covers the period from March 1, 2020 to December 31, 2021. The shelter in place order also impacted the ability of Two Feathers to begin to implement this contract.

Building a CQI program

NCCD's research and program staff met with CWS leadership in November 2019 to continue discussing a plan to support data-driven decision making. The discussion included ways for CWS leadership to prioritize targeted continuous quality improvement (CQI) efforts.²⁶ CWS presented commitments made in the past to demonstrate areas of progress and where refinements in commitments are needed. NCCD encouraged the agency to renew Business Process Mapping to identify key opportunities for CQI activities. As discussed later in Section E of this report, CWS is now beginning to build a CQI program. Some areas of practice are already being tracked and reported and CWS is in the process of hiring a manager for the CQI program.

Training CWS and HSCO staff

Staff hired during this period at CWS were trained on new and revised policies and procedures by CWS' training supervisor. CWS supervisors trained existing staff on new and revised policies and procedures and are expected to follow-up with social workers through coaching activities. In October 2019, CWS sponsored Cultural Training to improve participants' understanding of local native cultures and traditions, and the ability to provide culturally responsive services for families, adults, children, and youth.²⁷ CWS staff, including the CWS Director, attended each day of the training and an additional four CWS staff attended at least one day. CWS reports that the training is mandatory for new CWS staff and that most staff (83%; 125 of 151) have attended at least one day of the training.²⁸

HCSO provided data reflecting that all deputies are current with annual CANRA training as of February 29, 2020.

Complaints about CWS practices

Although CWS shared evidence of staff attending initial and refresher training as part of their efforts to implement new and updated CWS policies and procedures related to the Judgment, practices remain inconsistent. Complaints to CWS management, leadership, and the Ombudsperson's Office, as well as CSSP continue to indicate inconsistent policy implementation, decision making, and practices, especially in cases involving polysubstance dependence and domestic violence. The complaints have reflected instances of children in high risk and questionably safe situations with tenuous plans for their safety and care. CWS acknowledges the disparity between practices and expectations and identifies this as a priority area for development.

²⁶ CQI is the systematic process of identifying, describing, and analyzing strengths and problems, then testing, implementing, learning from, and revising solutions as needed.

²⁷ As space allows, CWS invites staff of law enforcement, Tribal, Mental Health, Public Health, and Social Services agencies, Probation, and Family Resource Centers to support a culturally responsive system of care.

²⁸ Excluding interns and staff in "extra help"/temporary and clerical positions.

Some Tribes continue to express concern about CWS not fully implementing updated and newly developed policies and procedures. At the same time, some Tribes continue to work with CWS leadership, in partnership with the Tribal Consultant required by the Judgment, to develop protocols or MOUs with the County.

Resolving complaints

In response to multiple and significant complaints about CWS practices, decision making, and collaboration, CWS developed a temporary process, unrelated to the Ombudsperson's Office, to resolve disputes on a case-by-case basis through involvement of the CWS and Tribal Social Services Directors.²⁹ In addition to problem-solving on individual cases, the case-level assessment by the Directors is expected to inform where there is need for systemic fixes and/or interventions from the developing CWS Continuous Quality Improvement (CQI) team.

IV. Performance on Corrective Actions

The following is a discussion of performance and progress by CWS and HCSO in key substantive areas of the reform work and Judgment from September 1, 2019 to February 29, 2020.

A. Tribal Collaboration

Children who identify as American Indian and who are eligible for or enrolled in a Tribe represent a significant number of CWS investigations and cases. Of the 746 reports assigned for investigation, involving 953 children, from September 1, 2019 and February 29, 2020, primary race and ethnicity data are only available for 77 percent (735 of 953) of those children. The *primary race/ethnicity* of 33 percent (246 of 735) of the children is identified as American Indian. Twenty-two percent (164 of 735) of those children were members of or eligible for membership in a Tribe in Humboldt County.^{30,31,32}

Children whose *primary race/ethnicity* is identified as *American Indian* or who are noted as eligible for or are members of a Tribe in CWS/CMS represented 32 percent (96 of 303) of children involved in an in-home case from September 1, 2019 to February 29, 2020, and 30 percent (163

²⁹ Each Tribe's protocol with CWS is expected to formalize a dispute resolution process.

³⁰ Missing data fields are either blank (204), indicate unable to determine (7), or decline to state (7). CSSP has not validated these data.

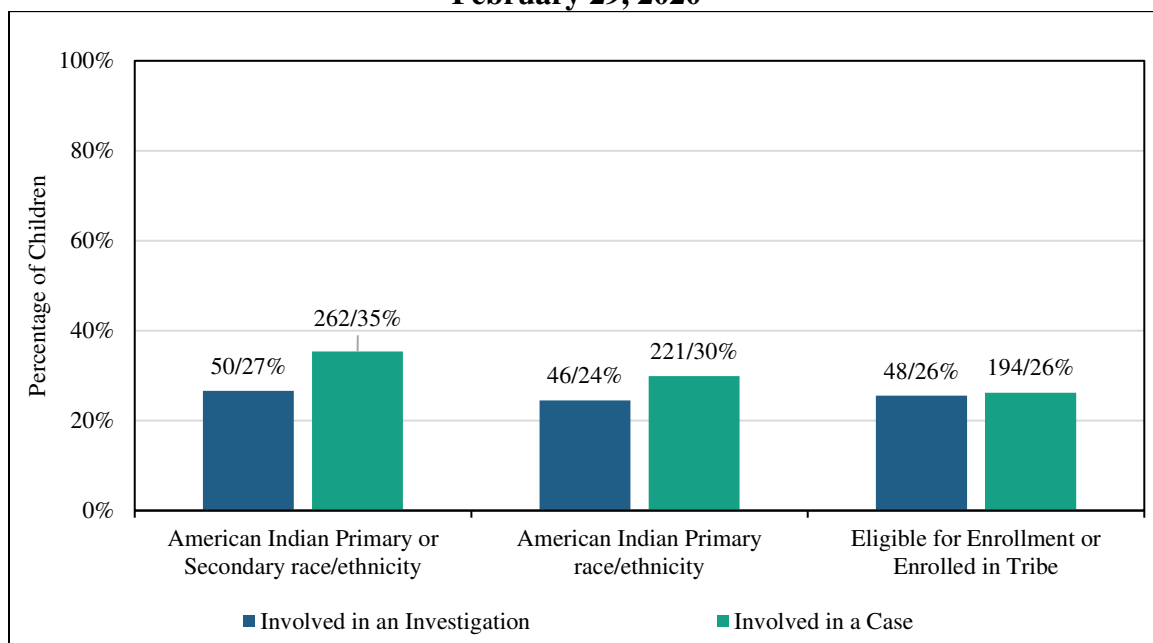
³¹ Correction to CSSP's report dated December 16, 2019: from March 1 to August 31, 2019, CWS conducted 1,005 investigations, representing 1,225 children.

³² For investigations, the data are 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 seventy-six children with no primary ethnicity or Tribal affiliation identified were removed from the universe of children involved in investigations.

of 549) of children who were in foster care at any time from September 1, 2019 to February 29, 2020.^{33,34,35}

The number of children involved in an investigation or case, on February 29, 2020, and whose *primary or secondary or primary race/ethnicity* is identified as *American Indian* is depicted in Figure 1 below. Children who are eligible for enrollment or enrolled in a Tribe are also depicted in Figure 1. Depending on the source of data, American Indian children represent 24 to 27 percent of CWS investigations and are involved in 26 to 35 percent of cases where, post-investigation, CWS is providing voluntary or Family Court-ordered services to a family while children remain at home (family maintenance) and foster care cases.

**Figure 1: American Indian Children Involved with Humboldt County CWS
February 29, 2020***



Source: Humboldt County CWS

*On February 29, 2020, there were 188 children involved in a CWS investigation and 740 children involved in a CWS case, including 224 children in a family maintenance case and 516 children in foster care.

In 2018, American Indian/Alaska Native children represented 7.4 percent of the Humboldt County child population.³⁶ American Indian children are overrepresented in the Humboldt County child

³³ Seventy of the children involved in an in-home case were members of a Tribe in Humboldt County.

³⁴ Fourteen children with no primary ethnicity or Tribal affiliation identified were removed from the universe of children involved in a family maintenance case; and 12 children with no primary ethnicity or Tribal affiliation identified were removed from the universe of children involved in a foster care case.

³⁵ One hundred and forty-two children in foster care are identified as a member of or eligible for membership of a Tribe in Humboldt County.

³⁶ <https://www.kidsdata.org/region/324/humboldt-county/summary#6/demographics>

welfare system, given their population in the County. There are several corrective actions of the Judgment related to CWS' work with these children and their Nations.

1. DHHS-CWS continued to communicate commitment to staffing an ICWA program to achieve consistency in expected practices.

CWS issued new policies and guidance about working with Tribes and trained staff in early 2019. Tribal Social Services and others continue to be frustrated about inconsistencies in staff knowledge, adherence to policy, and a lack of accountability when expectations are either not understood or followed. The DHHS and CWS Directors are committed to building an ICWA program in partnership with Tribal Social Services representatives, CWS leadership, and input from CWS staff. This program will specialize in responding to reports and cases involving Tribal children. CWS expects that a newly planned program would help achieve consistent adherence to applicable expectations intended by the new policies and guidance and the Judgment. CWS added a managerial position to the organizational structure to oversee the planned ICWA program. As of mid-May 2020, the agency was screening applicants. DHHS expects to fill the position by October 2020 with involvement of Tribes in the hiring process.

Work with Tribes to discuss and build the program began in mid-March 2020, just beyond this monitoring period. These conversations have continued with facilitation by CWS' Tribal Consultant at the specific request of the Tribal Social Services Directors; these are occurring virtually due to the pandemic.

In a response to CSSP's recommendation in the December 2019 report *To improve communication, adherence to law and policy and its relationship with Tribes by (w)orking diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices*, CWS is relying on supervisory review and approval of referrals to ensure reporting to Tribes within timeframes guided by the response time; documentation of contact with the Tribe; and sufficient notice to arrange to see the family and children together.³⁷

2. CWS' contracted Tribal Consultant continues to facilitate MOUs or protocols between DHHS, CWS, and Tribes in Humboldt County.

The work to develop and negotiate protocols with the eight federally recognized Tribes in Humboldt County continues, though with slow progress. The protocols are to govern the process for collaboration that will ensure timely, shared decision-making on cases involving Tribal children.³⁸ The protocol (MOU) between the Hoopa Valley Tribe and Humboldt County's DHHS and CWS is the only MOU developed thus far. It was approved by the Humboldt County Board of Supervisors on February 5, 2019.

³⁷ Judgment, Sections N. and N. (1).

³⁸ Judgment, Section P.

Ongoing communication issues between some Tribes and CWS, along with Tribes' concerns about CWS' inconsistent implementation of existing mandates, have impacted progress with the other Tribes. Turnover of key staff within some Tribes has also had an impact on progress. Despite all of this, CWS' Tribal Consultant, DHHS, and CWS are continuing to make good faith efforts to develop agreements between Tribes and the County. Efforts include attending Tribal Council meetings, holding individual meetings with Tribal representatives, working on the development of protocols with other Tribes, and during this period, meeting with several other Tribal representatives from Bear River, Trinidad, Yurok, and Wiyot to begin to discuss and develop MOUs similar to the one with Hoopa Valley Tribe. DHHS has requested that the Director of the California Department of Social Service's Office of Tribal Affairs provide additional assistance in working with Tribes to develop protocols.

During this period, the Tribal Consultant has also encouraged and helped to organize meetings between CWS and Tribal Social Service Directors, a step towards improving the collaborative work and realizing additional MOUs. As discussed later in this report, the Tribal Consultant is also assisting with Tribal addendums to the DA's Cast Protocol.

B. Community Task Force and Inter-Agency Coordination

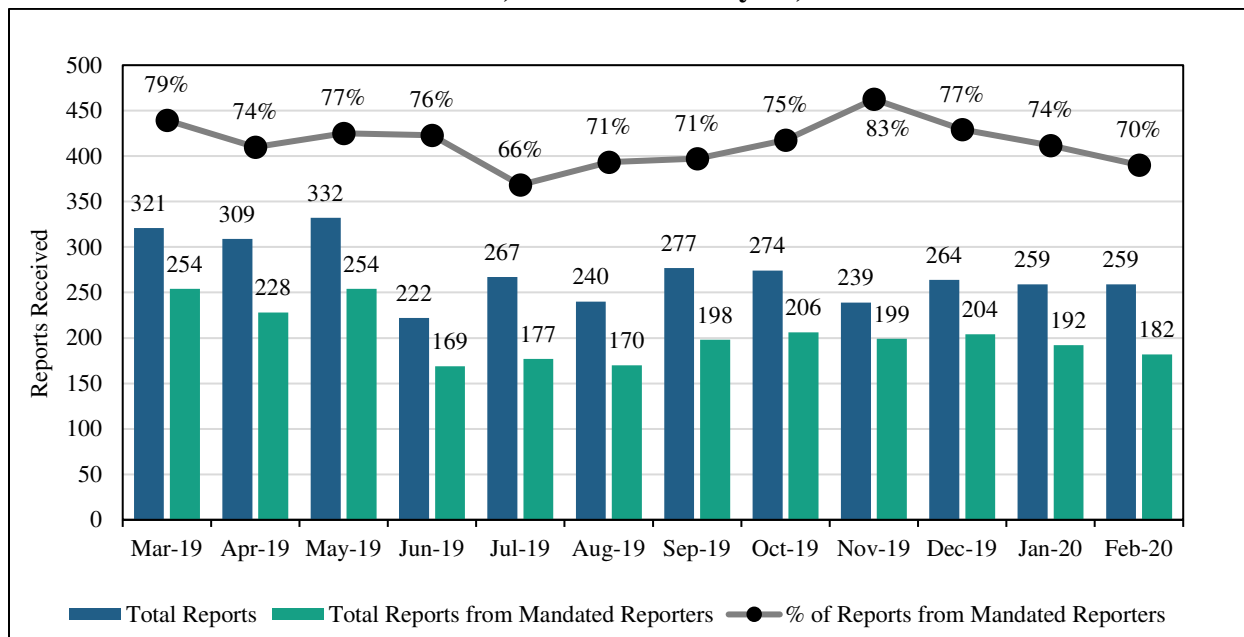
Representatives from Humboldt County school districts, Office of Education, Department of Probation, DHHS' Mental Health Division, local law enforcement, Tribal Social Services Department staff, Court Appointed Special Advocates, Humboldt County courts, Family Resource Centers, youth advocates, Humboldt County Public Health, foster parents, and CWS attend a Community Task Force hosted by HCSO and DHHS as required by the Judgment.^{39,40} These professionals represent mandated reporters of suspected child abuse and/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 March 1, 2019 to February 29, 2020 on the total number of child abuse and neglect reports CWS received and the portion of those reports made by mandated reporters. CWS generated a letter notifying the mandated reporter of CWS actions on the report 99 percent of the time.⁴¹

³⁹ Humboldt Network of Family Resource Centers <https://www.hnfrc.org/home>

⁴⁰ These representatives are expected to make policy recommendations to their respective departments (Judgment, Section II).

⁴¹ Judgment, Section L.; Generation of a letter does not indicate the letter is sent to the mandated reporter but is the best measure CWS has of this practice.

**Figure 2: Total and Percentage of Suspected Child Abuse and/or Neglect Reports Received by Humboldt County CWS from Mandated Reporters
March 1, 2019 to February 29, 2020**



Source: Humboldt County CWS

1. The DHHS - HCSO Community Task Force met in November 2019 and February 2020.

DHHS and HCSO sponsored Community Task Force meetings in November 2019 and February 2020. The group moved ahead with a meeting during a school holiday week, with the understanding that attendance might decrease but there was in fact consistent attendance, participation, and cross sector representation at both meetings.⁴² The Task Force has not yet filled one of the Co-Chair positions left vacant in August 2019 when the former Co-Chair, a foster and adoptive parent, accepted a position with CWS.

Community Task Force agendas include items aimed at engaging participants in discussions about, as well as gathering their feedback on, outcome data and systems improvement efforts. CWS managers participate and engage in substantive conversations regarding their program areas. During the two meetings held this monitoring period, CWS solicited community perspectives on the following: ongoing development and refinement of the Child Protection Reporting Guide (CPRG); revisions to the CWS' Visitation Policy and Procedures; and demographic, performance, and outcome data that the Task Force members are interested in tracking. Community Task Force attendees expressed interest in data such as data from years prior to Judgment, what accounts for dips or spikes in various data, Statewide data and additional demographic data.

⁴²Agendas, notes, and materials from Community Task Force meetings may be found at: <https://humboldt.gov.org/2373/Community-Task-Force>

Task Force meetings included presentations on DHHS' systems review of CWS' Ombudsperson's Office; CWS' case review results related to the SIP; the new community-based Multi-Family Visitation program; the social worker teaming strategy; and the Family Wellness Court, a joint jurisdictional court formed by the Superior Court of Humboldt County and the Yurok Tribal Court.⁴³

CWS shared a "Child Welfare Services System Reform Activities Roadmap" at the February 2020 meeting.⁴⁴ The Roadmap shows CWS' reform efforts beginning in 2009 through 2019. Upcoming activities included finalization of the workload study; CPRG implementation; and building workforce development, CQI, and ICWA programs.

At the November 2019 Task Force meeting, NCCD presented updates on the CPRG including the purpose and development of hands-on field testing which took place in late-2019. Community Task Force participants had an opportunity to simulate field testing, engage in conversation about their experiences, and ask questions. Field testing ended in early February 2020; CWS does not yet have results. NCCD and CWS had planned working meetings with the CPRG sub-committee for April 2020 to present an overview of results from testing; modify manuals and decision trees based on testing findings and feedback; make decisions on recommended changes throughout the CPRG manual; and plan for CPRG training and implementation. Planning for implementation includes community outreach and communication, initial and ongoing community training plan, and CQI and outcome measures. Due to physical distancing restrictions in response to the pandemic, this meeting will be rescheduled, and possibly held virtually.

At the November 2019 Community Task Force meeting, CWS also presented on the development and implementation of a recommendation from CWS social workers and a supervisor that led to the creation of the Eureka-based Multi-Family Visitation Center. The Center is a community-based space for children in foster care and their family members to spend time and engage in recreational activities together at Humboldt County's Jefferson Community Center.⁴⁵

Looking forward, CWS had planned to hold the May 2020 Community Task Force meeting at the Multi-Family Visitation Center, and present results of DHHS' review of the internal systems of CWS' Ombudsperson's Office. The opportunity to see and experience the Multi-Family Visitation Center and hear about the DHHS review represent continuity and follow-up on two topics about local work which are of importance to the community. CWS will also work with HCSO to introduce the Community Task Force to the joint work of their agencies and how practices have improved over time. These plans will be part of future meetings.

⁴³ <https://newsroom.courts.ca.gov/news/family-wellness-court-brings-healing-to-tribal-families>

⁴⁴ The Roadmap can be found as Appendix C of this report and on page 13 of the February 20, 2020 Task Force notes on the Humboldt County Community Task Force website:

<https://humboldt.gov/AgendaCenter/ViewFile/Minutes/02202020-1604>

⁴⁵ <http://jefferson-project.org/>

2. The Humboldt County District Attorney's Child Abuse Services Team Protocol Subcommittee met to complete steps to finalize the CAST protocol.

The CAST is a group of professionals representing multiple disciplines, sponsored and hosted by the DA's Office.⁴⁶ Representatives include 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. As previously reported, the completion of the Humboldt County's District Attorney's (DA) Office's CAST protocol is long overdue.⁴⁷

CSSP recommended that *HCSO, CWS, and County stakeholders work with partners to finalize and implement the CAST protocol/MOU* by the end of February 2020. Following a meeting between a CA Deputy Attorney General and the Humboldt County District Attorney (DA) on February 19, 2020, CWS, HCSO, the DA, and representatives from local Tribes, including Bear River, Trinidad Rancheria, and Two Feathers Native American Family Services, participated in a Humboldt County Child Abuse Services Team (CAST) Protocol Development Subcommittee meeting.

The Protocol Development Subcommittee members agreed on next steps to finalize the CAST document which included a CWS consultation with county counsel. In early March 2020, the DA sent a copy of the protocol to Tribal Chairs and offered to receive addendums. The DA intended to work with Tribes with support from CWS' Tribal Consultant to develop addendums and a goal of receiving all addendums. This is not yet complete due to the COVID-19 pandemic. The DA's Office reports that the protocol will be final with signatures from the DHHS Director and Sheriff. CWS continues to honor the agreement to notify Tribes of interviews while the CAST protocol is pending finalization.

CWS shared data reflecting that from September 2019 through February 2020, CAST interviews were held for children of families from different Tribes. A Tribal representative was present for two of the three interviews. The Tribe received information on the day of the interview in the other case.

C. 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 new and updated policies. The Judgment also includes corrective actions related to CWS' technical assistance from NCCD. CWS provided documentation of training and coaching delivered from September 1, 2019 to February 29, 2020, which meets the

⁴⁶ <https://humboldt.gov.org/2413/Child-Abuse-Services-Team-CAST>

⁴⁷ Judgment, Section B refers to the CAST Protocol.

expectations of the Judgment. There were no training requirements of HCSO from September 2019 through February 2020.

1. CWS social workers continue to attend and host Child and Family Team meetings. Data are only available on the number of meetings held and not on elements which reflect participation in, the effectiveness, or quality of the meetings.

A child and family team (CFT) includes, as applicable, older children, parents, family members, Tribal representative(s), professional supporters of the family members (often referred to as service providers, such as counselors, substance abuse treatment provider), and others who make up the family's support system (a best friend, 12-step program sponsor).^{48,49}

CWS provided data on 392 CFT meetings held from September 1, 2019 to February 29, 2020, representing 368 cases.⁵⁰ There is no standardized process for collecting data on these meetings, so this may be an underrepresentation of CFT meetings held. Also, some of these meetings may also have been hosted by another agency. Discussions and actions resulting from those meetings may or may not meet the intents for a CFT meeting. CFT meetings were reported to be held for an average of 61 families each month, ranging from 48 families in September 2019 to 72 families in February 2020.

According to CWS policy, CFT meetings are expected to be held for planning and at key decision points in a case, especially when there is a safety plan in effect to prevent a child from entering foster care. A CFT meeting is also to be held within 60 days of a child's entry to foster care, and quarterly thereafter, for reviewing and planning to meet goals in the case. CWS reports exploring ways to capture additional information about CFT meetings including researching existing CFT participant surveys being piloted in other counties within CA, reviewing and refining existing reports about meetings, and considering the implementation of designated facilitators for meetings. CSSP's recommendation in the last monitoring report *to (i)mplement multiple measures to understand the impact of and experiences with CFT meetings and better support staff and families as they participate*. A long-term goal is for the new CQI program to guide development and implementation of a tracking system for effective CFTs. CWS has not established a timeframe for this work. CFT meetings have continued by phone and video conference during the shelter in place order.

⁴⁸ Judgment, Section M.

⁴⁹ CFT meetings are voluntary for parents, or an older youth when no parent is involved. A parent or youth may decline to have a meeting. The CFT is considered their meeting and therefore not deemed a CFT if they do not participate. In some cases, separate meetings may be held for each parent. These types of meetings, when participants are prepared, engaged, and guided has benefitted many families and youth.

⁵⁰ This is not a unique count of cases; some families may have had multiple meetings.

2. NCCD delivered technical assistance and leadership coaching to CWS.

SDM[®] training and coaching

NCCD continued to work with CWS to build understanding and capacity to assess safety and risk in practice and reliably use Structured Decision Making[®] (SDM[®]) assessments. Goals are to develop CWS staff as SDM[®] coaches and to institute policy requiring regular SDM[®] case reviews by supervisors.⁵¹ CSSP reiterated NCCD's recommendation that each supervisor *review at least one case per social worker per month using the CA SDM[®] case reading tools* to verify and provide supports where needed to ensure fidelity to the SDM[®] tools. Monthly supervisory reviews as recommended by NCCD are not routinely occurring.

Workload study

Collaboration between CWS and NCCD on the workload study continued.⁵² Completed tasks for the workload study include study design; development of a sampling strategy; an organizational culture assessment to inform strategies to improve workload conditions and staff retention; development of training materials; and training social workers and supervisors to collect data about their work activities in order to improve the accuracy and meaningfulness of data gathered. Data collection tasks for the study by social workers and their supervisors, anticipated to take two months, began on March 2, 2020, but were suspended on March 19, 2020 due to the COVID-19 pandemic and the disruption/changes in worker activities. Prior to suspension of the data collection, the workload study was set to produce a final report in September 2020. CWS and NCCD will adjust that date once they are able to resume data collection.

The workload study is expected to project the number of social workers CWS needs to function according to agency standards and to guide CWS' work with Human Resources and the Union representing social workers in producing a recruitment and retention plan to meet and maintain social worker staffing levels.⁵³ Prior to data collection, work was done to account for the unique attributes of Humboldt County – large geographic and rural areas, and diverse populations. Preparation for the study also accounted for the practices and tools CWS social workers and supervisors are expected to implement to engage, assess, and partner with families, Tribal communities, and families extended formal and informal networks. For example, the time it takes for social workers are expected to collaborate with Tribal Social Services from the receipt of a report to closure of a case, convene multi-disciplinary team meetings, child and family team meetings, and staffings must be factored into the workload. Results are also expected to assist with development and implementation of an effective Humboldt County ICWA program.

⁵¹ SDM[®] case reviews require a review of documentation in the case record, including SDM[®] assessments, for expected practices and congruence in assessment and decision-making.

⁵² Judgment, Sections CC. (3) and CC. (7)

⁵³ While the workload study will specifically provide information on the number of social workers CWS needs, it will not address all job classifications, such as social work aides or supervisors.

Related to the workload study, in its December 2019 report, CSSP recommended “*continued efforts to fill vacancies and give social workers resources needed for timely and quality investigations*”. DHHS committed to creating and filling vacant social worker positions throughout CWS with qualified candidates and by January 2019 had increased the number of CWS social worker positions to 103. With the additional positions, there were 38 (37%) vacant social worker positions. CWS’ quarterly recruitment for vacant positions resulted in filling four social worker positions from September 1, 2019 to February 29, 2020. On January 3, 2020, the social worker vacancy rate was 17 percent (17 of 103). In February 2018, the vacancy rate was 20 percent (13 of 65).⁵⁴

The allocation of CWS social services aide positions, who are an important resource for social workers and families, has remained stable at 28 since January 2018. Social services aides with one year of CWS experience are eligible to be promoted to a social worker, level I position. CWS recently promoted six social services aides. Recruitment for vacant positions from September 1, 2019 to February 29, 2020 yielded five new social services aides. As of February 29, 2020, 19 of the 28 (68%) social services aide positions were filled.

As of February 2020, CWS dedicated eight social worker positions to receive and screen reports of suspected abuse and/or neglect and each position is filled. There are 20 social worker positions dedicated to conduct child abuse and neglect investigations, 19 are filled and there is one vacancy.⁵⁵

Leadership coaching

NCCD’s technical assistance includes helping to increase the ability of CWS leadership to recognize, understand, and appreciate cultural differences, and the impact of race, historical trauma, class, gender, and sexual orientation on individuals, CWS management decisions, the overall functioning of the organization, and on the children, youth, and families CWS serves. The CWS Director, Deputy Directors, and managers participated in one leadership coaching session with NCCD consultants during this monitoring period. CWS is working with NCCD to extend this opportunity to all CWS staff, beyond leadership. CWS believes that engaging in this process will allow leaders and staff to examine consistencies and inconsistencies in the agency’s approach to multiculturalism and that with shared language and a common approach, the leadership team will increase their capacity to support each other and their staff, address diversity among themselves, and explore barriers and strategies that may support their work with children and families.

CQI consultation

NCCD encouraged CWS to renew efforts at Business Process Mapping to build a clear outline of current expectations and practices and identify key opportunities for CQI activities. In a November 2019 consultation meeting, CWS discussed methods for articulating and communicating

⁵⁴ Filled positions include staff on extended leave.

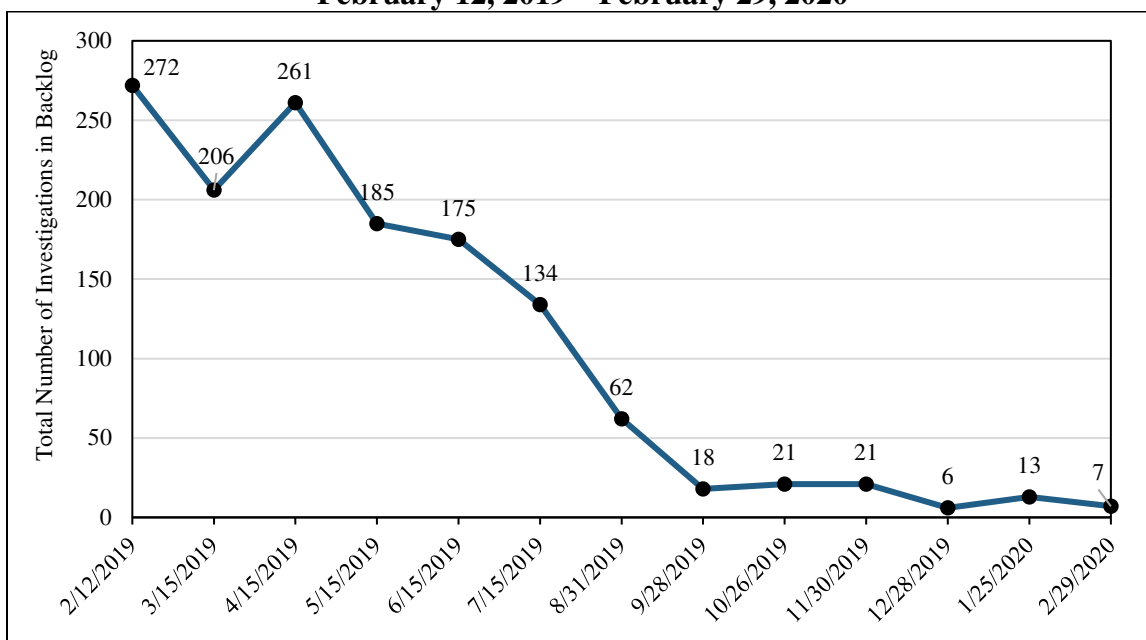
⁵⁵ Ibid

overarching agency CQI goals and committed to begin creating a framework for the agency's CQI program. CWS subsequently followed through on that commitment, creating a CQI manual with expectations for the program.

3. CWS has significantly reduced the number of investigations in backlog and maintained that status.

Figure 3 below shows the number of CWS backlogged investigations at specific times each month from February 12, 2019 to February 29, 2020. The number of investigations in backlog status has significantly reduced over time. Humboldt County now ranks among the top 10 of the state's 57 counties with the counties with the fewest number of investigations open beyond the timeframe expected by the state and the Judgment. Staff of the CWS unit which focused on reducing the backlogged investigations have now transitioned to investigation units.

**Figure 3: CWS Investigations Backlog
February 12, 2019 – February 29, 2020**



Source: Humboldt County CWS

In its December 2019 report, CSSP recommended that *CWS create a plan on how to sustain the progress on the backlog reduction and to determine those investigations that legitimately reflect a need to maintain an open file on a family and that the plan should reflect the next steps for the work of the backlog unit.*⁵⁶ CWS has incorporated the processes that were successful in the backlog work into their investigations practice including social workers continue to work in pairs to conduct investigations and there is greater effort given to assign investigations to social workers

⁵⁶ Judgment, Section CC. (8) c.

based on the family's residence and the Tribe for which a child is eligible or enrolled.⁵⁷ An additional investigation unit was added to the program.

While work in pairs may not be easy, many also report having more time to focus on families with whom they work, improving their knowledge of community-based resources. A common reaction from stakeholders in the community outside of CWS is that having paired social workers assigned to investigations has resulted in noticeable improvement in being able to reach a social worker who is knowledgeable about the investigation.

According to CWS data, from September 1, 2019 to February 29, 2020, 238 investigations exceeded 40 days. A request for extension form was submitted for 70 percent (167 of 238) of the investigations. Fifty-three percent (88 of 167) of the requests for an extension were submitted on or before the 40th day after CWS received the report and a supervisor approved request all but three of timely requests. A CWS manager and a Deputy Director maintain oversight of requests for extension by reviewing some requests, with the manager reviewing 10 requests per month and the Deputy Director reviewing five requests per month. While there is use of the request for extension form and approval process, it is not in use as fully intended. The expectation is that a request for an extension be submitted in a timely manner so that efforts may be made to avoid the backlog, understand and resolve systemic issues, and provide assistance to social workers when required.

The most common reasons for requesting an extension include needing to see an adult or child as part of the investigation. CWS reports implementing a requirement in January 2020 for referrals extending beyond the approved extended timeframe. Social workers must complete and submit a "non-compliance incident form" to the manager of the Emergency Response Program and CQI Deputy Director.

To further drill down on the process of conducting timely and comprehensive investigations, CSSP recommended that *CWS track time to completion of investigations by social worker and supervisor* to better understand performance issues, barriers, and dynamics influencing time to completion of investigations.⁵⁸ A CWS analyst provides regular managerial reports on the status of investigations. There are multiple points of analysis for investigations data available to social workers, supervisors, and managers. This includes the ability of social workers to track their caseload and due dates, and for management to understand performance by social worker and supervisor. CWS is pleased with the outcome of pairing social workers and geographical assignments of investigations on increasing timeliness to completion of investigations.

⁵⁷ CWS made interim assignments of staff to work with Tribal children and families, and as of April 2020 is beginning to work with Tribes to develop criteria for and finalize assignments.

⁵⁸ Judgment CC. (8) d.

D. Implementing a New Emergency Response System

CWS' 24-hour emergency response system, to receive and respond to reports of abuse and/or neglect, continues to work well for the community, according to both HCSO and mandated reporters who attend Community Task Force meetings. CANRA Coordinators at both HCSO and CWS have developed a working relationship and systems of tracking reports. For example, the HCSO and CWS were quickly able to track a recent delayed report from HCSO to CWS to make sure both agencies were involved, coordinating, and communicating. HCSO is also updating its training and messaging to deputies on the acceptable methods of communicating with CWS in response to a report sent by facsimile. CWS and HCSO are also planning to increase the frequency of reconciling data to make sure that reports are received and attended to as needed.

CWS Intake

CWS reports that in addition to the supervisor assigned to the hotline during the day, a part-time social worker provides training and coaching to screeners once a week. A supervisor and two social workers rotate working an extra shift to staff the agency's after-hours response. One social worker answers the phone and another responds in-person, if needed. Social workers are expected to earn a minimum number of points working after-hours shifts each month. The agency continues to explore implementing a second shift ending at 10 PM. Coverage from 10 PM to 8AM and weekdays and weekends would remain applicable to the after-hours or on-call point system described above.⁵⁹ CWS maintains an answering service as a back-up, with the expectation that the answering service will immediately contact the designated CWS staff person. CWS tracks how calls to the hotline are routed and data show that from January 1 to March 3, 2020, there were 2,777 calls to the hotline and all but seven (<1%) of those calls were routed to a CWS social worker. Two callers were initially connected to an answering service before being to a CWS social worker within two minutes.⁶⁰

CWS data show from September 1, 2019 to February 29, 2020, the agency received 1,571 calls regarding suspected abuse and/or neglect.⁶¹ About two-thirds of those reports (991 of 1,571, 63%) were "evaluated out" by CWS, deemed as not reaching the threshold for an investigation or containing allegations already under investigation.⁶² Based on reports, CWS referred 239 families to a Family Resource Center which provides direct services, case management, resources, and referrals. CWS reports six families declined services, and 73 families became involved with a

⁵⁹ CWS reports call volume at the hotline is reduced after 10:00 PM.

⁶⁰ For four of the calls reaching the answering service, there was no live caller on the line and no caller number identified. CWS believes these are spam calls.

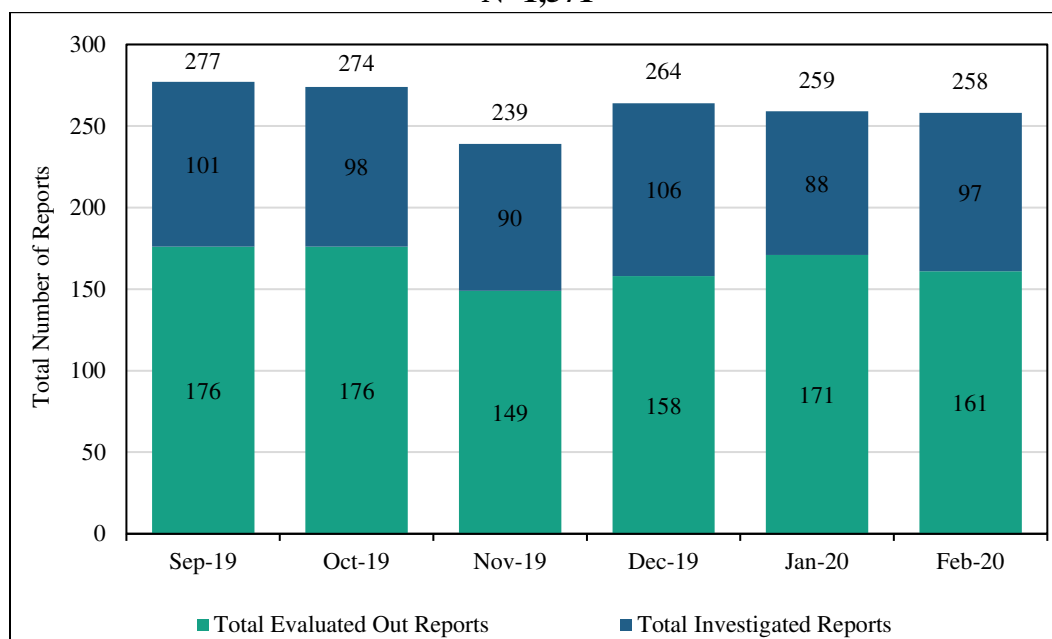
⁶¹ This is a count of discrete reports which could reflect multiple reports about the same family, child, or even the same allegations. When CWS receives a report meeting criterion for investigation and containing the same allegations of an investigation already in progress, the new reports is given a number but added to the open investigation, as opposed to creating another investigation.

⁶² Humboldt County's rate of reports evaluated out is historically, and remains, about 20 percent higher than the state's average.

Family Resource Center.⁶³ The remaining 37 percent of reports (580 of 1,571) were assigned for investigation.

Figure 4 below shows the number of child abuse and neglect reports received from September 1, 2019 through February 29, 2020, the number evaluated out or did not receive an in-person response from a social worker, and the number assigned for investigation each month.

**Figure 4: CWS Reports of Suspected Child Abuse and/or Neglect
Received, Evaluated Out, or Assigned for Investigation
September 1, 2019 – February 29, 2020
N=1,571**



Source: Humboldt County CWS

CWS Cross-reporting

CWS social worker screeners electronically send cross reports and data to law enforcement systems. CWS reports sending 985 cross reports to law enforcement from September 1, 2019 to February 29, 2020, most to local law enforcement.⁶⁴ The table below shows the number and percent of reports made to local law enforcement agencies.⁶⁵ CWS also sent reports to other counties in California, California Highway Patrol, other states, and Canada.

⁶³ Humboldt Network of Family Resource Centers: <https://www.hnfrc.org/home>

⁶⁴ Some referrals were cross reported to more than one agency.

⁶⁵ CWS and HCSO have agreed that CWS will forward all reports labeled child abuse and/or severe neglect to HCSO.

Table 1: CWS Cross Reports to Local Law Enforcement
September 1, 2019 – February 29, 2020
N=985*

Receiving Agency	Number and Percent of Reports
Humboldt County Sheriff's Office	472 (48%)
Eureka Police Department	235 (24%)
Arcata Police Department	95 (10%)
Fortuna Police Department	80 (8%)
Rio Dell Police Department	34 (3%)
Hoopla Valley Tribal Police Department	3 (<1%)
Ferndale Police Department	2 (<1%)

Source: Humboldt County CWS

*CWS sent reports to multiple agencies.

The MOU between HCSO and DHHS committed the agencies to implement an electronic tool to make, receive, and track cross reports jointly, and that the tool would include a clear description of the next steps taken by each agency.⁶⁶ However, the County developed an alternate process. CWS devised a desktop application for immediate electronic notification, or cross report, by email to law enforcement of *all* reports deemed to contain an allegation of abuse or severe neglect. HCSO takes multiple steps, some manual, to assign a report to a deputy. Mistakes were discovered during this monitoring period. Three reports, one each from September 2019, October 2019, and February 2020, were manually migrated to an incorrect file and not assigned to a deputy. Upon discovering the error, HCSO followed up with CWS for additional information and to decide whether there was a need for HCSO involvement. As a result of seeing this problem, CWS and HCSO have committed to increasing activities to reconcile data.

CSSP made three recommendations aimed at improving the function of the CWS hotline, including:

- *Recording hotline calls for quality assurance and training purposes;*
- *Implementing quality assurance activities at intake to support supervisors in reviewing each report to the hotline for adequacy of information gained; and*
- *Having managers perform QA reviews on a set number of intake reports.*

⁶⁶ MOU, 5. Joint Responsibilities of HCSO and CWS.

CWS expressed concern with the recommendation to *record hotline calls for quality assurance and training purposes*. Although recording hotline calls for quality assurance purposes is standard practice in many jurisdictions across the country, CWS expressed concern that recording phone calls may deter reporters. Alternatively, the agency decided that as of April 2020, a part-time social worker trainer and coach, who has been dedicated to screeners since May 2019, would provide direct support and feedback to each screener once a week for up to one day, including listening in on calls in real time and providing feedback. In addition, beginning in April 2020, supervisors listen to one call per screener per month and provide feedback and coaching.

CSSP also recommended that CWS *implement quality assurance activities at intake to support supervisors in reviewing each report to the hotline for adequacy of information gained*.^{67,68} CWS dedicates a supervisor for intake or screening to oversee staff activities and provide consultation as needed. That supervisor joins the other CWS emergency response supervisor in a daily rotation for supervision of intake. Especially given this rotation, work is needed to ensure CWS' expectations are the same, regardless of the screener who takes a report or the supervisor of the day.

CWS reports that since February 2020, supervisors have been conducting one SDM[®] case review per month. CWS also reports that in April 2020, a manager began conducting one secondary review per month of those completed by supervisors. This quality assurance step is related to CSSP's recommendation that *managers perform QA reviews on a set number of intake reports* which was aimed at increasing the quality and consistency of work at the hotline.^{69,70}

CWS Investigations

CWS intake determined that the overwhelming majority, 82 percent (475) of the 580 reports assigned for investigation from September 1, 2019 to February 29, 2020, required a social worker to respond within 10 days; the remaining 18 percent (105) of the 580 reports were deemed to warrant an immediate response from CWS.⁷¹ Figure 5 below shows the CWS assigned response times for CWS investigations from September 1, 2019 to February 29, 2020.

⁶⁷ Judgment, Section K.

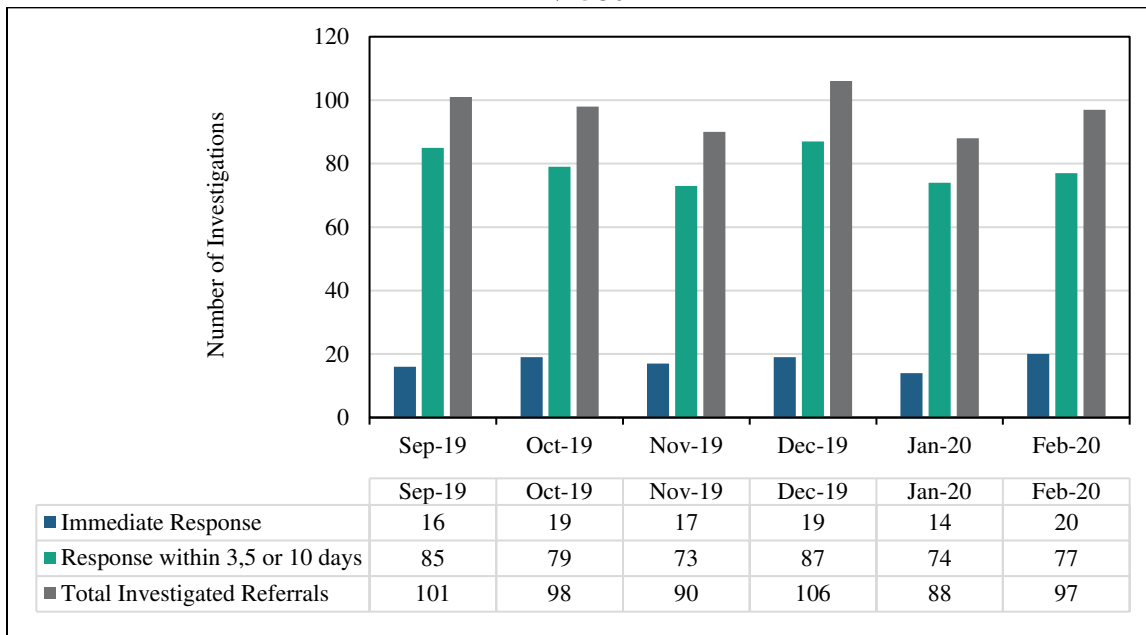
⁶⁸ Judgment Section BB. 1.b.

⁶⁹ Judgment, Section CC. (4).

⁷⁰ Judgment Section BB. (1) c.

⁷¹ Fifteen of the investigations deemed as requiring a response within 10 days required a 5-day response, eight required a response within three days.

**Figure 5: Assigned Response Times for CWS Investigations
September 1, 2019 – February 29, 2020
N=580**



Source: Humboldt County CWS

Each month, from September 1, 2019 to February 29, 2020, CWS met the response time designated at the hotline at a range of 87 to 98 percent. There was a timely response 94 percent (99) of the 105 investigations requiring an immediate response; all (100%) of the investigations requiring a response within three or five days; and a timely response for 88 percent (417) of the 475 investigations requiring a response within 10 days. CWS has been tracking performance on this practice with weekly reports distributed to the Director, administrative and supervisory staff.

CSSP also recommended *supporting investigators in continuing to make timely contacts with children, their caretakers, and others who may inform the investigation, and making timely entries into CWS/CMS.*⁷² This may include continuing support from other staff in entering documentation in CWS/CMS.

CWS states social workers can continue to receive assistance from clerical staff to enter documentation in CWS/CMS. CWS is also tracking data on the time from a contact with at least one alleged child victim to documentation of that contact in CWS/CMS – expected within three days of the contact – to better understand and troubleshoot barriers. While improving, there was timely documentation in 69 percent of investigations in December 2019 and January 2020.

⁷² Judgment, Sections CC. (8) c. and CC. (8) d.

Joint Investigations of CWS Reports to HCSO

HCSO is responding timely to reports received from CWS but communication and conducting joint investigations with CWS could be improved. Section X. (2) of the Judgment requires that HCSO coordinate an investigative response with CWS immediately if the CWS report involves an “emergency or 24-hour response.” For all other responses, HCSO is to: (1) investigate the allegations within 72 hours of receiving the report from CWS, and (2) communicate to CWS that HCSO is investigating within 36 hours after receiving the report from CWS. CSSP reviewed reports of suspected child abuse or neglect CWS sent to HCSO in January 2020 to determine HCSO’s time to investigation and communication with CWS.

As required by CANRA, CWS sends all reports of abuse and severe neglect to law enforcement. In January 2020, CWS sent 108 reports to HCSO.⁷³ HCSO assigned an incident number to each of the reports, as required by the Judgment for tracking. CWS had evaluated out 16 of the 108 forwarded reports and, upon review, HCSO determined that an additional 77 of the 108 reports did not warrant a response from law enforcement. The remaining 15 reports were applicable to Section X. (2) of the Judgment but were not deemed by CWS to require an immediate response. Therefore, HCSO was to investigate the allegations in each of the 15 reports within 72 hours and communicate with CWS within 36 hours of beginning its investigation. CSSP looked for documentation of communication between HCSO and CWS, including the CWS receiving the HCSO incident report for review within the stated timeframe (4.5 days).

For each of the 15 reports, an HCSO deputy began an investigation within no more than 48 hours of HCSO receiving the report. One of the HCSO incident reports and CWS documentation also reflected contact between CWS and HCSO to partner and investigate or share information. The remaining 14 HCSO incident reports concluded with a note to forward information to CWS. HCSO states that a Sergeant reviews each report for approval and HCSO’s Records department sends reports to the applicable agency. The CWS file contained the HCSO report for seven of the cases but for most (4) of the cases, the report did not inform the family’s subsequent contact with a Humboldt County employee about a report of child abuse and/or neglect. The social worker visited the family prior to receiving the report or speaking with HCSO Records staff or a deputy.

As discussed above, most reports to child protection sent to law enforcement do not warrant a response from law enforcement. Across the country, child protection systems substantiate allegations of physical or sexual abuse in less than eleven and seven percent of investigations respectively.⁷⁴ Standards for criminal abuse and neglect are higher. The reports sent to HCSO by

⁷³ Includes all reports of abuse and severe neglect as required by CANRA, some duplicate reports, and some reported to HCSO although the report to CWS originated with HCSO.

⁷⁴ A January 2020 report from the Children’s Bureau of the federal government’s Administration for Children and Families, cites 10.7 percent of children were found to be physically abused and 7 percent were found to be sexually abused, based on nationwide child protection administrative data from July 1, 2017 to July 30, 2018; rates are higher for infants and young children: <https://www.acf.hhs.gov/media/press/2020/child-abuse-neglect-data-released>

CWS include information about the family including allegations and findings of past reports regarding the family, and a listing of all household members at the time of previous investigations. This is information which would only be shared with HCSO for criminal investigative purposes but this otherwise protected information remains accessible in HCSO's records. HCSO reports these records cannot be purged from its electronic system. The agency can track all access to information in the electronic record system. The Sheriff committed to take steps towards restricting access to these confidential information.

CWS-HCSO Contact When HCSO Reports to CWS

HCSO reports forwarding 21 reports to CWS, as mandated reporters from September 2019 through February 2019. Seven of the reports did not include an allegation against a parent or guardian and CWS evaluated out those reports. CWS evaluated out an additional six reports which did not contain allegations requiring a CWS response.

For five of the remaining eight reports, there was no joint response or direct contact between CWS and HCSO, nor documentation by CWS that a joint response with HCSO was not needed.⁷⁵ For each of the five cases, CWS notified HCSO through the electronic cross-reporting system that the report would be assigned for investigation. Upon completion of the investigation, CWS shared a summary of the investigation activities and findings with HCSO. For three HCSO reports to CWS, CSSP found no record in CMS/CWS.

HCSO also reports receiving 22 reports of child abuse that fell outside of their jurisdiction. Twelve of these reports were immediately routed electronically to other local law enforcement agencies. The HCSO dispatchers immediately sends reports to the Arcata, Eureka, and Fortuna Police Departments. The Fortuna Police Department serves as dispatch for the Ferndale and Rio Dell Police Departments. Other actions taken include taking an initial report, ensuring the child(ren)'s safety during an in-person response, and in each instance, forwarding the report to the proper jurisdiction for initial or further investigation.

HCSO Staffing to Serve Humboldt County

As of February 29, 2020, 12 HCSO deputy positions remain vacant. Recruits are currently in the training academy and there are additional recruits awaiting enrollment in the training academy. HCSO expects to fill vacancies from those groups. As of the publication of this report, all officer training is suspended due to the shelter in place order.

⁷⁵ Judgment, Section H. (5) requires that the assigned CWS social worker contact HCSO immediately or within 36 hours, depending on the response time assigned by CWS.

E. Revision of Policies and Procedures

Since 2018, HCSO and CWS created, updated, and circulated new policies to staff by email and reviewed policies with staff in group training settings.⁷⁶ Supervisors, managers and leadership should see consistent evidence of the agency's expectations in direct observation, review of documentation of work, feedback from others, and outcomes in cases.

A critical function for CWS is ensuring that staff are adhering to the policies and procedures with fidelity and positive outcomes. In late 2018, CWS developed a multi-stage implementation plan towards this goal that has not yet been fully implemented. The implementation plan included testing the policy and procedure to identify gaps, and/or any areas requiring clarification or strengthening. Fidelity measures were to be developed and used for ongoing monitoring and any needed improvement. CWS plans to embed the development of fidelity and record review tools in the CQI program. As discussed below, CWS is taking further steps to build a CQI program with a manager to be hired in September 2020 and full implementation expected by February 2021.

CSSP will work with CWS and NCCD to finalize a plan to perform SDM[®] case readings for a statistically valid sample of reports and investigations, to be carried out in the fall of 2020. A separate survey instrument to capture additional required practices will be applied. A report of CWS' and HCSO's baseline performance following the dissemination of new policies and procedures, training, and coaching to implement those policies and procedures will follow.

HCSO adjusted Child Abuse Policy to better focus the work of deputies.

On December 11, 2019, HCSO further amended Policy 330 *Child Abuse* to streamline the work of deputies while still meeting terms of the Judgment.⁷⁷ As agreed to in the Judgment, the Sheriff's Office promptly assigns each report and cross report to a deputy as a call for services. The policy change clarifies what a deputy should do if a case does not meet CANRA criteria for child abuse and neglect. If the investigation – in this situation, the HCSO deputy's review of the allegations – shows the report does not meet the criteria for child abuse or neglect as defined in CANRA (Penal Code 11164 et seq.), the deputy may document the call for service, which has a trackable number, in HCSO's record management system, RIMS, with a brief explanation as to why the call for service was closed without further action. HCSO has notified deputies of this adjusted requirement. It will be reiterated during initial and annual CANRA training.

CWS is beginning to develop methods to better understand current practices, including those related to the implementation of policies and procedures.

⁷⁶ Eight CWS policies procedures are available at DHHS' webpage: <https://humboldt.gov.org/2454/CWS-Policies-Procedures>

⁷⁷ Sections X. and Z.

In the December 2019 monitoring report, CSSP recommended that *CWS create an agency wide CQI program*.^{78,79} As previously mentioned, this was already planned for in CWS' systems improvement efforts, which addresses the entirety of the CWS system. CWS is now moving ahead with this work at an increased pace and began CQI program planning to track and understand system and practice status related to new, updated, and existing policies and other related state requirements, such as the California-Child and Family Services Review.⁸⁰ Currently, a Deputy Director and senior analyst are assigned to the CQI program. CWS expects to hire a CQI program manager and assign a dedicated analyst to support the program by September 2020. February 28, 2021 is the expected date for full-scale implementation of the CWS CQI program.

The CWS Director, Deputy Director, and analysts, including one assigned to the CQI program, have attended training and presentations on CQI program development, facilitating quality improvement teams, and using root cause analysis. They explored systems review processes, drafted policies and procedures on child fatality and near fatality reporting, and case reviews. The currently small team is tracking and reporting on SDM[®] compliance, calls made to the hotline and how they are routed, investigation completion, and feedback to mandated reporters.

CWS plans for CQI staff to host dedicated meetings to present to and hear from a range of stakeholders; meet with the Community Task Force to share data and gain feedback and input; and attend CWS program and all-staff meetings to maintain an understanding of and assess issues impacting CWS. The agency believes CQI activities provide an additional layer of accountability for the work with children, families, and other providers.

The process of tracking, distributing, and taking any other needed actions in response to letters and notices from the state will be housed in the CQI program. This is an important, policy and practice -related step to sustain work accomplished in response to the Judgment. Prior to the Judgment several CWS policies, procedures, and practices had not been updated based on state requirements and notices.

Plans for this calendar year include identifying and developing internal CQI processes and participants; designing management tools and tracking mechanisms; developing a process to share CQI data with staff, Tribes, and community stakeholders, and receive feedback; developing a CQI policy; and implementing management tools and tracking systems to support data-informed decision making with technical assistance from NCCD.

CSSP will work with CWS and NCCD to finalize a fall 2020 plan to perform SDM[®] comparative case readings – comparing the results of case reviews by CWS supervisors with results of case reviews by NCCD staff – and a review of a statistically valid sample of reports and investigations

⁷⁸ Judgment, Section KK. (3).

⁷⁹ Judgment, Section CC. (4).

⁸⁰ <https://www.cdss.ca.gov/inforesources/child-welfare-program-improvement/child-and-family-services-review>

applying a survey to be developed. A report of CWS' and HCSO's baseline performance following the dissemination of new policies and procedures, training, and coaching to implement those policies and procedures will follow. CSSP will seek to engage CWS CQI and other staff as members of the review team.

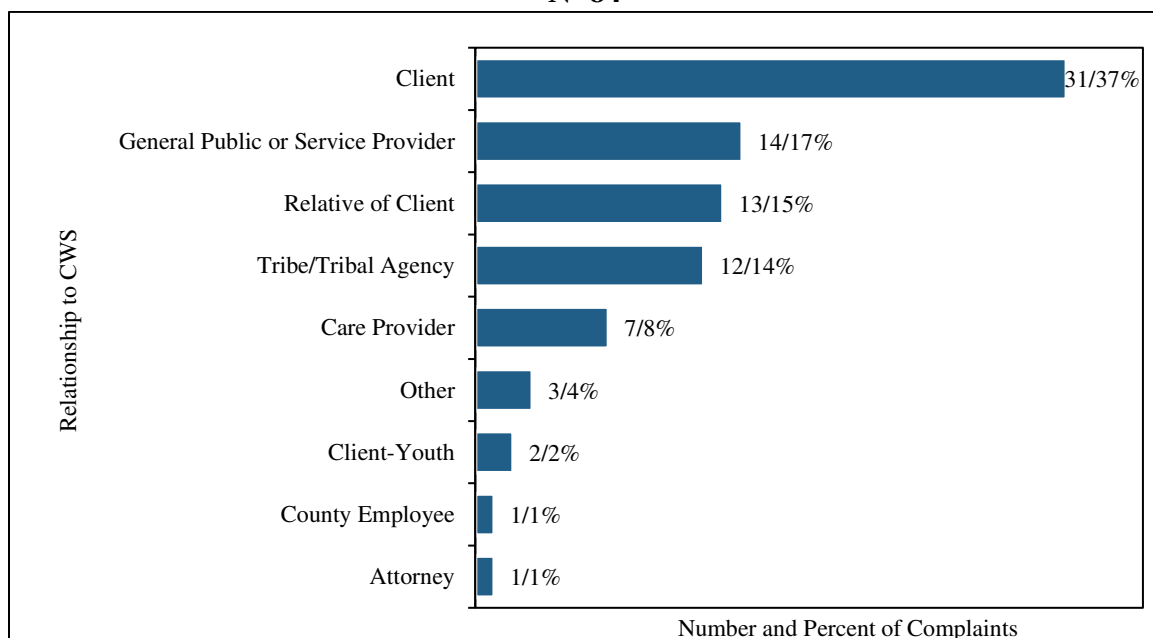
F. Complaint System

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.⁸¹ DHHS conducted a systems review of the Ombudsperson's Office to understand the structure and functioning. CSSP planned to work with CWS to conduct a survey of callers to the CWS Ombudsperson Office to assess actions and follow-up, but this plan was put on hold when tasks relating to the shelter in place order took precedence.

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

Data provided to CSSP by CWS indicate that the Ombudsperson's Office began 84 inquiries in response to complaints received from September 1, 2019 to February 29, 2020. The figure below shows the complainant affiliation for the 84 investigations.

**Figure 6: CWS Ombudsperson Complainant Affiliation
September 1, 2019 – February 29, 2020
N=84**



Source: Humboldt County CWS

⁸¹ Judgment Sections GG. and HH.

The CWS Ombudsperson's Office reports an average of seven pending inquiries on complaints at the end of each month from September 2019 to February 2020. Complaint themes continue to reflect the need for improved communication between CWS staff, the families it serves, and community stakeholders and the need to clarify a policy or procedure. The Ombudsperson's Office also receives calls when there is disagreement with a decision made in a case. DHHS presented results of a DHHS review of the CWS Ombudsperson's Office during the May 2020 Community Task Force meeting. DHHS reports planning to move forward to implement each of the following recommendations from their review of the Ombudsperson's Office:

1. Move Ombudsperson's Office from the CWS chain of command.
2. Clarify the role of the Ombudsperson.
3. Update the Ombudsperson's Office Policy and Procedures.
4. Implement training for the Ombudsperson and staff of the Office.
5. Standardize case file maintenance.
6. Implement marketing strategies for the Office.
7. Enhance the feedback loop for data from the Ombudsperson's Office.
8. Improve Communication.
9. Enhance confidentiality.
10. Create a closure process with complainant follow-up.
11. Utilize corrective action plans.
12. Build relationships within CWS and in community.
13. Increase involvement of practice and Cultural Coaches.
14. Ensure access to Ombudsperson's Office is youth friendly.
15. Enhance customer service.

CSSP's survey of complainants to the Ombudsperson's Office, scheduled to begin in mid-March 2020, is on hold due to the shelter in place order. CSSP will provide updates in subsequent reports on progress in implementing the DHHS recommendations.

2. HCSO continues to track complaints related to CANRA.

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 no calls or persons visiting their office from September 1, 2019 to February 29, 2020 with a complaint. None of the formal complaints handled during this period related to CANRA.

V. Recommendations

The CSSP recommendations below are presented in the interest of furthering the completion and sustainability of related corrective action(s) of the Judgment.

To improve the functioning of the hotline, CWS should:

1. **Standardize expectations and practices across supervisors at intake.**⁸² Subsequent tracking of performance against those expectations, feedback to staff from supervisors about their work, and taking actions needed for individual and/or systemic improvements are steps to increase consistency at the hotline, support the function of all supervisors, and the social workers who screen reports.

To improve communication, adherence to law and policy, and its relationship with Tribes, CWS should:

2. **Identify strategies to support social workers, families, and their supporters in implementing plans to keep children, especially infants and young children, safely with their parents or family members.** This includes providing staff and families with the expertise and resources needed for efforts to address threats to a child's safety and to conduct safety and risk assessment both in practice and the use of SDM[®] assessments.
3. **Take actions to better understand and address practices across investigations and cases of all families, not just Tribal, on systemic and individual case levels.** There remain considerable legitimate concerns across Tribes about the inconsistent adherence to policy and procedures in screening; collaborating during investigations; making determinations and decisions on next steps post-investigations; safety planning; and reducing risk and assuring safety in open cases.
4. **Develop agreements for joint training of CWS and Tribal Social Services staff who complete SDM[®] assessments together, as well as joint technical assistance sessions with NCCD.** A shared understanding of how to complete the assessments and engage in related practices are essential for collaborative work on behalf of children and families⁸³.

⁸² CWS maintains a daily rotation of investigators into the role of supervisor at intake. Those and other supervisors also work as supervisors after hours. There is increased room for variability at this decision-making point.

⁸³ Judgment, Sections BB. (1) c; (2) c.; CC. (2); and CC (6).

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

- 5. CWS should publish select performance data on the county's website.** This is both a way to recognize success and communicate about areas needing improvement.

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

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 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 5/9/2018. CWS expects to finalize Intake policy by 10/12/2018. CWS circulated the MOU to staff 2/15/2018.	A. (1) Completed policy revision CWS circulated Intake policy to staff on 10/12/2018.		
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	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
Child Abuse Services Team (CAST) Protocol and Collaborative Processes					
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.	Ongoing	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.	B. Completed Defendants are invited to participate in the Humboldt County CAST Advisory Board. The Humboldt County District Attorney's Office has not held Protocol Subcommittee meetings during this period.	B. Completed Defendants are invited to participate in the Humboldt County CAST Advisory Board. The Humboldt County District Attorney's Office has not held Protocol Subcommittee meetings during this period.	B. Completed Defendants are invited to participate in the Humboldt County CAST Advisory Board. The Humboldt County District Attorney's Office held one Protocol Subcommittee meetings on 2/19/2020 with CWS and HCSO present.
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.	February 20, 2018	B. Not completed The CAST protocol has not yet been finalized by the Humboldt County District Attorney's CAST Advisory Board. ⁸⁴	B. Not completed The Humboldt County District Attorney's Office has not finalized the CAST protocol.	B. Not completed The Humboldt County District Attorney's Office reported to HCSO that the protocol is finalized except for signature(s) from Tribes.	B. Not completed The Humboldt County District Attorney's Office reported protocols or MOUs require addendum and agreement from each Tribe.
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	August 13, 2018	B. Completed CWS has developed a protocol for	B. Not completed CWS and HCSO have been in	B. Not completed The Humboldt County DA's Office	B. Not Completed Following a meeting between the DA and

⁸⁴ 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	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
protocol, timeframe for completion, and additional steps Defendants can take to address coordination of CAST interviews to the extent any are needed.		accessing CAST while awaiting a final protocol. Defendants have conferred with the CA AG. ⁸⁵	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.	has not finalized the CAST protocol and reports to HCSO requiring signatures from Tribes. <i>See Recommendation 9: Work with partners to finalize and implement the CAST protocol/MOU by the end of February 2020.</i>	CA AG on February 14, 2018, the Humboldt County DA's Office met HCSO, CWS, CWS' Tribal Consultant, and members of the CAST subcommittee to discuss addendums needed from each Tribe to accompany the protocol. This work was to be completed by April 2020 and was delayed due to the pandemic.
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.	March 16, 2018	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.	C. Implementation Incomplete No system-wide data are available on CWS ensuring coordination of mental health services.	C. Implementation Incomplete No system-wide data are available on CWS ensuring coordination of mental health services and other community-based services. Anecdotal, there have been complaints about a lack of coordination and delays accessing	C. Implementation Incomplete No system-wide data are available on CWS ensuring coordination of mental health and child welfare services.

⁸⁵ First report read "Not Completed".

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		CWS and CMH developed an agreement for a multi-disciplinary team (MDT).		appropriate services, especially for adolescents presenting with elevation risk of harm to themselves.	
Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendant CWS					
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.	June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per formal written request made by CWS	D. Completed CWS updated and circulated policies on 6/26/2018.			
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.	June 14, 2018, extended to June 25, 2018	E. Completed policy development CWS developed Policy and Procedure on Mandated Reporter and circulated to staff on 6/26/2018		E. Implementation Incomplete 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	E. Implementation Incomplete Social workers are aware of this policy. CWS reports during this period there were 39 reports regarding children in out-of-home care, 20 were evaluated out and 19

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		CWS developed Policy and Procedure on Reports on Open Investigations or Cases and circulated to staff on 6/26/2018.		assigned for investigation. CWS has not taken steps to review and ensure this practice. <i>See Recommendation 10: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i>	were assigned for investigation. CWS has not taken steps to review and ensure this practice.
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.	March 15, 2018 and ongoing	F. Completed 3/16/2018	F. Maintained	F. Maintained	F. Maintained
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.	June 14, 2018 and ongoing	G. Completed 6/4/2018 CWS has fully transitioned to an electronic data entry system for intake. Social	G. Maintained	G. Maintained <i>See Recommendation 3. Have managers perform QA reviews on a set number of</i>	G. Maintained Managers are beginning to perform QA reviews on a set number of intake reports each month.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		worker screeners enter information, including on the Web SDM [®] assessment tool in CMS.		<i>intake reports each month.</i>	
H. CWS shall ensure timely cross-reporting to law enforcement agencies and the District Attorney's ("DA") office.	June 14, 2018 and ongoing	H. Completed 6/4/2018 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.	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.	H. Maintained CWS sent 1,055 cross-reports to law enforcement agencies and the DA's office. Ongoing quality improvement is needed to avoid duplication of cross-reports.	H. Maintained CWS sent 985 cross-reports to law enforcement agencies and the DA's office. Ongoing quality improvement is needed to avoid duplication of cross-reports and make sure each report is received and properly assigned.
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.	June 14, 2018 and ongoing	H. (1) Completed 6/4/2018 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	H. (1) Maintained	H. (1) Maintained See above.	H. (1) Maintained See above.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		enforcement agencies.			
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 6/4/2018 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. (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 6/4/2018 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. (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 4/23/2018 A CWS program manager reviews all	H. (4) Maintained	H. (4) Maintained	H. (4) Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		cross reports for timeliness.			
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 6/4/2018 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.	H. (5) Maintained QA steps are needed to ensure these practices. CSSP reviewed HCSO reports to CWS for January 2020. CWS informed HCSO through the cross-reporting system whether an HCSO report would be investigated. For the 5 reports assigned for investigation, CWS did not contact HCSO nor document that a joint response was not necessary.
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 3/29/2018 CWS reports not refusing to handle reports, including those which fall outside its geographical jurisdiction.	I. Maintained	I. Maintained	I. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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 3/29/2018 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. (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 3/29/2018 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	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.					
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	June 14, 2018, extended to June 25, 2018 by the	J. (1) Completed 6/26/2018 CWS 09-09 Emergency Response. Title:			

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
www.cclss.ca.gov/lettersnotices/entres/getinfo/acl05/pclf/05-09.pdf	Office of the Attorney General per written request made by CWS	Reports on Open Investigations or Cases circulated to staff.			
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	June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS	J. (2) Completed 6/26/2018 CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases was circulated to staff on 6/26/2018.			
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.).	June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS	J. (3) Completed 6/26/18 CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases was circulated to staff on 6/26/2018.			

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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	June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS.	K. Partially Completed CWS developed Intake policy and procedures and circulated to staff on 6/26/2018. CWS expects to circulate Investigations policy and procedures by 12/14/2018.	K. Completed policy development Implementation Incomplete CWS 18-20 Investigations policy and procedures was distributed on 12/14/2018. Steps are needed to verify adherence to policy.	K. Implementation Incomplete Steps are needed to verify adherence to policy. Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations.	K. Implementation Incomplete Steps are needed to verify adherence to policy. Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations. CWS has committed to creating an ICWA program, including CQI measures, to address concerns and improve collaboration with Tribes.
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.	June 14, 2018, extended to June 25, 2018 by the Office of the Attorney	L. Completed 6/26/2018 CWS circulated Mandated Reporter policy and procedures; informing mandated	L. Completed CWS 18-20 Investigations policy and procedures on 12/14/2018.	L. Completed CWS documented sending a response for 1,214 (97%) of the 1,252 reports received from a mandated reporter:	L. Completed CWS documented generating a response for 99% of reports received from a mandated reporter.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
	General per written request made by CWS	reporters of the status of a referral will also be addressed in the Investigations policy expected to be circulated by 12/14/2018.		1,207 written and seven telephone or in-person). For the additional 38 reports there was no documentation of a response.	
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.	June 14, 2018	M. Completed training and policy development, 6/26/2018 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 6/26/2018.	M. Implementation Incomplete There is no data on assessment of implementation.	M. Implementation Incomplete There is no data on assessment of implementation.	M. Implementation Incomplete There are no data on assessment of implementation. CWS holds Child and Family Team meetings at a rate significantly lower than expected by policy. 392 CFT meetings were held for 368 cases.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
Tribal Collaboration					
N. CWS shall revise its policies and procedures to ensure collaboration with and input relating to decision-making from tribes.	June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.	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 12/31/2018.	N. Completed Policy Development; Implementation Incomplete CWS completed the process of gaining input on policies from Tribes on 11/30/2018. Efforts are needed to ensure expected practices.	N. Implementation Incomplete Efforts are needed to ensure expected practices. <i>See Recommendation 10: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i> <i>See Recommendation 12: Actively plan with Tribes for ICWA programming, as announced and promised.</i> <i>See Recommendation 13: Continue to work actively with the Tribal Consultant to</i>	N. Implementation Incomplete Efforts are needed to ensure expected practices. CWS supervisors are reviewing referrals for expected practices. <i>See 2019 Recommendation 10: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i> <i>See Recommendation 12: Actively plan with Tribes for ICWA programming, as announced and promised.</i> <i>See Recommendation 13: Continue to work actively with the Tribal Consultant to negotiate Tribal protocols/MOUs.</i>

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<i>negotiate Tribal protocols/MOUs.</i>	
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.	June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.	N. (1) Not Completed Intake policy and procedures to be updated with Tribal input by 10/12/2018.	N. (1) Completed Policy Development; Implementation Incomplete CWS updated Intake policy and procedures with Tribal input. 10/12/2018. Efforts are needed to ensure expected practices.	N. (1) Implementation Incomplete Efforts are needed to ensure expected practices. <i>See Recommendation 10: Work diligently to eliminate legal and policy violations and ensure consistent adherence to policy mandates in all practices.</i> <i>See Recommendation 12: Actively plan with Tribes for ICWA programming, as announced and promised.</i> <i>See Recommendation 13: Continue to work actively with</i>	N. (1) Implementation Incomplete

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<i>the Tribal Consultant to negotiate Tribal protocols/MOUs.</i>	
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.	June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.	N. (1) a. Not Completed Intake policy and procedures to be updated with Tribal input by 10/12/2018.	N. (1) a. Completed Policy Development; Implementation Incomplete CWS updated Intake policy and procedures with Tribal input on 10/12/2018. Efforts are needed to ensure expected practices.	N. (1) a. Implementation Incomplete Efforts are needed to ensure expected practices.	N. (1) a. Implementation Incomplete Efforts are needed to ensure consistency in expected practices.
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.	June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.	N. (2) Not Completed To be included in Investigation policy and procedures expected to be finalized by 12/31/2018.	N. (2) Completed Policy Development; Implementation Incomplete CWS updated Investigation policy and procedures with Tribal input. Efforts needed to ensure expected practices.	N. (2) Implementation Incomplete Efforts needed to ensure expected practices.	N. (2) Implementation Incomplete Efforts needed to ensure consistency in expected practices.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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.	April 14, 2018 Ongoing	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.	O. Maintained	O. Maintained	O. Maintained
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.	November 14, 2018	P. In Process Tribal Consultant Olin Jones has met regularly with CWS and Tribal representatives to identify priorities and begin to draft protocols.	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. In Process Tribal Consultant Olin Jones continues to assist in developed of protocols/MOUs between Humboldt County and Tribes. <i>See Recommendation 13: Continue to work actively with the Tribal Consultant to negotiate Tribal protocols/MOUs.</i>	P. In Process Tribal Consultant Olin Jones continues to assist in the development of protocols/MOUs between Humboldt County and Tribes. CWS continues to work actively with the Tribal Consultant to negotiate Tribal protocols/MOUs. Tribes see the inconsistent implementation of existing policies and protocols as an indication of the

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
					reliability of a future protocol or MOU.
Revision of Policies and Procedures by Defendant Sheriff's Office					
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.	March 15, 2018	Q. Completed 3/14/2018 The Sheriff's Office updated policies and procedures to reflect requirements in this this section and distributed to staff.			
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.	March 15, 2018 and ongoing	R. Completed 3/14/2018 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	R. Maintained CSSP interviewed three staff hired or promoted during MP1. They each had a thorough grasp of policies and expectations.	R. Maintained Efforts are needed to ensure expected practices.	R. Maintained Efforts are needed to ensure expected practices.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		C.C.R. §900 et seq.), including regulations relating to investigations of suspected child abuse in out-of-home care facilities.			
S. The Sheriff's Office shall ensure timely cross-reporting to CWS and DA's office.	March 15, 2018 and ongoing	S. Completed 3/14/2018 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.	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	T. Maintained	T. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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	U. Maintained	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 3/14/2018 HCSO reports to CWS as soon as aware of child abuse/neglect situation and follow-up in writing.	V. Maintained	V. Maintained	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.			
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."	March 15, 2018 and ongoing	X. Completed 3/14/2018 HCSO ensures that cross reports are assigned for service.	X. Maintained CSSP has reviewed HCSO data which reflects these practices.	X. Maintained CSSP has reviewed HCSO data which reflects these practices.	X. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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.	March 15, 2018 and ongoing	X. (1) Completed 3/14/2018 HCSO reports a weekly review of cross reports.	X. (1) Maintained CSSP has reviewed HCSO data which reflects these practices.	X. (1) Maintained CSSP has reviewed HCSO data which reflects these practices.	X. (1) Maintained
X. (2) An assigned Deputy shall coordinate an investigative response with CWS immediately if 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.	March 15, 2018 and ongoing	X. (2) Completed 3/14/2018 HCSO and CWS CANRA Coordinators track referrals and cross reports to ensure joint work.	X. (2) Maintained Expectations for these practices continue. Efforts are needed to understand coordination across agencies.	X. (2) Maintained Expectations for these practices continue. CSSP will collect data and report on joint response practice in the subsequent report.	X. (2) Maintained Expectations for these practices continue. A CSSP review of CWS reports to HCSO in January 2020, found that deputies are investigating in a timely manner but reporting directly to CWS about investigations.
Y. The Sheriff's Office may not refuse to accept reports from mandated reporters or other reporters, including reports that fall outside its geographical jurisdiction.	March 15, 2018 and ongoing	Y. Completed 3/15/2018 HCSO reports not refusing to handle reports, even those which fall outside its geographical jurisdiction.	Y. Maintained	Y. Maintained	Y. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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	March 15, 2018 and ongoing	Y. (1) a. Completed 3/15/2018 HCSO reports transferring calls to appropriate agency.	Y. (1) a. Maintained	Y. (1) a. Maintained	Y. (1) a. Maintained
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.	March 15, 2018 and ongoing	Y. (1) b. Completed 3/15/2018 If HCSO cannot transfer, reports are sent to the appropriate agency.	Y. (1) b. Maintained	Y. (1) b. Maintained	Y. (1) b. Maintained
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	March 15, 2018 and ongoing	Y. (2) a. Completed 3/15/2018 HCSO handles cross-reports from CWS that are outside jurisdiction by transferring to appropriate agency and following-up with call to appropriate agency.	Y. (2) a. Maintained	Y. (2) a. Maintained	Y. (2) a. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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.		Y. (2) b. Completed 3/15/2018 Handling of cross-reports from CWS outside jurisdiction, after transferring to appropriate agency, follow-up with call to appropriate agency and notify CWS.	Y. (2) b. Maintained	Y. (2) b. Maintained	Y. (2) b. Maintained
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 3/25/2018 CWS - Creation of internal system for cross-reports.	Z. Maintained	Z. Maintained	Z. Maintained
AA. Within 45 days of the entry of Judgment, Defendant Sheriff's Office shall create an internal tracking tool for reports and cross-reports. The Sheriff's Office shall maintain an electronic record of all cross reports received, including any 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. Maintained HCSO continues to maintain an electronic system of reports and cross reports received and made and subsequent actions taken.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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	AA. (1) Maintained
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 19 reports received, tracked, and forwarded to the appropriate agency.	AA. (2) Maintained 22 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 NCCD continues to provide training, technical assistance, and coaching to CWS staff and management. <i>See Recommendation 2: Implement quality assurance activities</i>	BB. (1) a.-d. Completed NCCD continues to provide training, technical assistance, and coaching to CWS staff and management. CWS has implemented supervisory coaching at intake and, as of February 2020, supervisors conduct

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<i>at intake to support supervisors in reviewing each report to the hotline.</i> <i>See Recommendation 6: Require supervisors to conduct monthly reviews of at least one case per social worker per month.</i>	one SDM [®] case review per month. CWS also reports that in April 2020, a manager began conducting one secondary review per month of those completed by supervisors.
BB. (2) Culturally Responsive Services, which includes, but is not limited to: 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.	June 30, 2019 and ongoing	BB. (2) a.-d. Completed NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (2) a.-d. Maintained NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (2) a.-d. Maintained NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (2) a.-d. Maintained NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.
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.	March 15, 2018 and ongoing	CC. (1) – (7) Completed contract 2/27/18 CWS amended its contract with NCCD to provide	CC. (1) – (7) In process: (2), (3), and (7) NCCD completed work on mapping decision making	CC. (1) – (7) In process: (2), (3), and (7) NCCD provided coaching in SDM [®] implementation and	CC. (1) – (7) In process: (2), (3), and (7) NCCD provided coaching in SDM [®] implementation and

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
<p>(1) Assistance with revision of policies and procedures.</p> <p>(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.</p> <p>(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.</p> <p>(4) Manage by data assistance, including bolstering continuous quality improvement processes, leveraging data resources, and analytic support to improve agency practices.</p> <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 (I).</p>		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.	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>safety organized practice and began to plan for the workload study.</p> <p>CWS must work on managing by data, implement CQI structures, and integrate Tribal needs into system improvement.</p> <p><i>See Recommendation 3: 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: Work diligently to eliminate legal and policy violations and ensure consistent</i></p>	<p>safety organized practice and began the workload study.</p> <p>CWS took steps to increase managing by data and implementing CQI structures.</p>

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<p><i>adherence to policy mandates in all practices.</i></p> <p><i>See Recommendation 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.</i></p> <p><i>See Recommendation 15: Create an agency wide CQI program.</i></p>	
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.	CC. (8) Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<p><i>See Recommendation 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.</i></p> <p><i>See Recommendation 7: Track time to completion of investigations by social worker and supervisor.</i></p>	
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.			
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	April 28, 2018 and ongoing, as needed	CC. (8) b. Completed CWS implemented plans to complete	CC. (8) b. Maintained		

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
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.		outstanding investigations.			
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.	February 13, 2019	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.	CC. (8) c. Completed, 2/12/2019 CWS eliminated the backlog of 293 investigations as of February 12, 2019.	<i>See Recommendation 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.</i>	<i>To conduct timely investigations, CWS pairs social workers for investigations and makes geographical assignment of investigations. Social workers may also receive assistance from clerical staff to enter notes in CWS/CMS.</i>
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.	February 13, 2019	CC. (8) d. Not Completed The backlog of investigations was 168 on September 12, 2018.	CC. (8) d. Not Completed The backlog of investigations was 191 on February 28, 2019.	CC. (8) d. Not Completed The backlog of investigations was 62 on August 31, 2019.	CC. (8) d. Completed The backlog of investigations was 7 on February 29, 2020.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
Training					
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: (1) The requirements of CANRA and the Welfare & Institutions Code, including the legal obligations of CWS and confidentiality requirements;	August 12, 2018	EE. (1) Completed August 9, 2018			
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	August 12, 2018	EE. (2) Completed August 9, 2018			
EE. (3) The revised policies and procedures that CWS is required to implement pursuant to the Judgment.	August 12, 2018	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.	EE. (3) Completed December 14, 2018 CWS circulated policies on that incorporated Tribal input.		
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.	Monthly from August 13, 2018	EE. (4) Completed The AG advised CWS to submit training provided			

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		and completed by employees directly to CSSP. CSSP received training list on August 10, 2018.			
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.	Annually, August and ongoing (for new hires)	EE. (5) Partially Completed CWS provided training on WIC, CANRA, accepting reports, and cross reporting. Policies and procedures, and therefore related training, have not yet been finalized.	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.	EE. (5) Completed New and ongoing staff have participated in sessions on CANRA, WIC, and policies.	EE. (5) Completed New and ongoing staff have participated in sessions on CANRA, WIC, and policies.
FF. Defendant Sheriff's Office shall provide annual mandatory training for its deputies and records personnel on the following subject matters: (1) Requirements of CANRA, including the legal obligations of the Sheriff's Office and confidentiality requirements; (2) Handling investigations relating to child abuse and neglect; (3) The revised policies and procedures that the Sheriff's Office is required to implement pursuant to the Judgment; and	Annually, August	FF. (1)-(4) Completed March 2018	FF. (1)-(4) Maintained	FF. (1)-(4) Not Completed HCSO reports providing annual training to all but 20 staff by August 31, 2019. ⁸⁶	FF. (1)-(4) Completed/Maintained All staff up to date on training. No additional requirements during this period.

⁸⁶ HCSO reports all staff, except two on extended medical leave, completed annual CANRA training by November 14, 2019.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
(4) Trauma-informed practices relating to interviews of children.					
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.	Ongoing	FF. (5) Completed	FF. (5) Maintained	FF. (5) Maintained	FF. (5) Maintained
Complaint Systems					
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.	April 15, 2018 and ongoing	GG. Completed April 13, 2018 CWS opened an Office of the Ombudsperson with an assigned supervisor "to provide independent review of questions and concerns related to CWS practices." ⁸⁷	GG. Ongoing CWS continues to operate the Office of the Ombudsperson which received 63 complaints this period.	GG. Ongoing CWS continues to operate the Office of the Ombudsperson which received 110 complaints this period.	GG. Ongoing CWS continues to operate the Office of the Ombudsperson which received 84 complaints this period.
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.	April 15, 2018 and ongoing	HH. Completed March 14, 2018 HCSO updated policy (now 920) and the CANRA Coordinator is assigned to handle	HH. Maintained HCSO received 3 inquiries related to child abuse and neglect investigations.	HH. Maintained HCSO reports receiving no complaints or inquiries related to child abuse and	HH. Maintained HCSO reports receiving no complaints or inquiries related to child abuse and neglect investigations.

⁸⁷ <https://humboldt.gov/DocumentCenter/View/63519/20180413-CWSOmbudsperson?bidId=>

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		and track policy procedural complaints related to CANRA.		neglect investigations.	
Community Task Force ("Task Force")					
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.	June 14, 2018 and ongoing	II. Completed 5/24/2018 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.	II. Maintained The monitor continues to observe Task Force meetings.	II. Maintained The monitor continues to observe Task Force meetings.	II. Maintained The monitor continues to observe Task Force meetings.
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.	June 14, 2018 and ongoing	JJ. Completed 5/24/2018 – 8/31/2018 Community Task Force meetings were held 5/24/2018, 6/21/2018, and 7/26/2018.	JJ. Maintained Community Task Force meetings were held 9/13/2018 and 1/24/2019.	JJ. Maintained Community Task Force meetings were held 3/28/2019, 5/23/2019, and 8/15/2019. See Recommendation 17: Share the results of DHHS' review of the	JJ. Maintained Community Task Force meetings were held 11/14/2019 and 2/14/2020.

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<i>Ombudsperson's Office with the Community Task Force.</i>	
<p>KK. The duties of the Task Force shall generally include:</p> <p>(1) Creation of a web-based Mandated Reporter Guide, which provides an overview of CANRA and the Welfare & Institutions Code, including:</p> <p>a. The legal obligations of each Defendant, including what types of reports fall within the respective jurisdiction of each agency;</p> <p>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</p> <p>c. The legal obligations of mandated reporters.</p> <p>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. (1) a.-d. In Process.</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. (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>KK. (3) In Process Addressed through the Community Task Force</p> <p><i>See Recommendation</i></p>	<p>KK. Task</p>

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
				<i>15. of this report: Create an agency wide CQI program.</i>	
KK. (4) Identification of available community-based resources within Humboldt County and processes to coordinate referrals to such resources as appropriate.	Target not yet set	KK. (4) In Process Mandated Reporter Guide sub-committee has shared several resources to be included in the guide.	KK. (4) In Process To be included with Child Protection Reporting Guide.	KK. (4) In Process To be included with Child Protection Reporting Guide.	KK. (4) In Process To be included with Child Protection Reporting Guide.
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.	December 2019 and ongoing	LL. Completed 8/7/2018 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	LL. Maintained	LL. Maintained	LL. Maintained

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
		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.			
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.	June 14, 2018 and ongoing	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 meeting minutes and documents can be found on the Community Task Force website. ⁸⁸	MM. Maintained 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 meeting minutes and documents can be found on the Community Task Force website. ⁸⁹	MM. Maintained 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 meeting minutes and documents can be found on the Community Task Force website. ⁹⁰	MM. Maintained 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 meeting minutes and documents can be found on the Community Task Force website. ⁹¹

⁸⁸ <https://humboldt.gov.org/2373/Community-Task-Force>

⁸⁹ [Ibid](#)

⁹⁰ [Ibid](#)

⁹¹ [Ibid](#)

Required Corrective Actions	Final Target	2/14/2018-8/31/2018 Performance	9/1/2018-2/28/2019 Performance	3/1/2019-8/31/2019 Performance	9/1/2019-2/29/2020 Performance
Compliance Monitor					
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.	March 1, 2018 and ongoing	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).	4. Maintained	4. Maintained	4. Maintained

Appendices

Appendix A: CSSP December 2019 Recommendations to CWS and HCSO with Updates

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.¹

Update: CWS is planning to provide direct support and feedback for each screener once a week, for up to one day. This includes a trainer/coach listening in on calls and providing feedback. In addition, supervisors would listen to one call per screener per month and provide feedback and coaching as of April 2020.

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.^{2,3}

Update: There is a designated supervisor for the hotline who joins other supervisors in a daily rotation of responsibility for the hotline. Supervisors review each report and communicate questions or feedback with the hotline screener, as needed.

3. ***Have managers perform QA reviews on a set number of intake reports*** each month for staff and system development.⁴ 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.^{5,6}

Update: CWS reports that since February 2020, supervisors have been conducting one SDM[®] case review per month. CWS also reports that in March 2020, managers were to begin conducting secondary reviews of the SDM[®] case reviews completed by supervisors.

¹ 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.

² Judgment, Section K.

³ Judgment Section BB. 1.b.

⁴ Judgment Sections, G. and I.

⁵ Judgment, Section CC. (4).

⁶ Judgment Section BB. (1) c.

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.⁷

Update: CWS has implemented quarterly hiring. While a few staff have separated for reasons unrelated to CWS, there has been an increase in staff assigned to investigations. Social service aides are an additional resource for social workers. CWS continues to fill those positions and social services aides often apply for and receive a promotion to a social worker title after gaining required experience.

- 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.⁸

Update: The CWS CQI team tracks timely contacts with children during investigations and timely entries in CWS/CMS. The pairing of social workers on investigations in May 2019 and allowing social workers to handwrite documentation for electronic input by a clerical staff person are additional steps CWS has taken to reduce the time to updating a case record.

- 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.⁹

Update: Supervisors are currently practicing conducting these case readings, with technical assistance from NCCD when needed. CWS implemented the review of case per social worker per month in February 2020.

- 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[®].¹⁰

Update: CWS tracks time to completion and a range of other data by social worker and supervisor to make management decisions. CWS credits the reduction and maintenance of the backlog to decisions such as pairing social workers for investigations and making work assignments based on a family's residence.

⁷ Judgment Section CC. (3).

⁸ Judgment, Section CC. (8) c.

⁹ Judgment, Section BB. (1) c.

¹⁰ Judgment CC. (8) d.

- 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.¹¹

Update: The plans to sustain the low backlog of investigations include continuing to pair social workers assigned to an investigation; making investigation assignments based on a family's residence, Tribal membership, or Tribal eligibility; and adding and maintaining an additional investigations unit.

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.**¹²

Update: The CAST Protocol subcommittee met following a meeting with between the AG and the Humboldt County DA on February 14, 2020. A plan to secure addendums from each Tribe, with assistance from the CWS Tribal Consultant, remains delayed, currently due to the pandemic. It is not clear whether the protocol is considered finalized or if agreement is needed from others in the County.

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.¹³

Update: CWS is relying on supervisory review and approval of referrals to ensure a Tribe(s) is contacted to participate in decision-making upon screening of a report.

- 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.^{14,15}

¹¹ Judgment, Section CC. (8) c.

¹² Judgment, Section B.

¹³ Judgment, Section E and N (1).

¹⁴ Judgment Section CC. (6)

¹⁵ Judgment, Sections N. and N. (1).

Update: CWS instituted a temporary process, outside of the Ombudsperson's Office, involving the CWS Director when disputes cannot be resolved by social workers, supervisors, or their manager. CWS is looking forward to a positive impact of an ICWA program.

- 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.¹⁶

Update: CWS and representatives of Tribal Social Services began meeting in March 2020, outside of the reporting period, to plan for an ICWA program. CWS has posted to hire a program manager to lead this work. The National Indian Child Welfare Association is also expected to consult with the group on lessons learned from other jurisdictions.¹⁷

- 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.^{18,19}

Update: CWS has continued to work with the Tribal Consultant and Tribes to create MOUs with Humboldt County. A barrier for some Tribes has been entering into an agreement when there are continued examples of non-adherence to existing agreements.

- 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.²⁰

Update: CWS can produce data on the number of CFT meetings held and for which child. The number of CFTs reported is very low compared to the number expected in implementing this practice and is likely an underrepresentation of practice. Data are not available that track the number of meetings held in relation to practice expectations nor on meeting participants and outcomes.

¹⁶ Ibid

¹⁷ <https://www.nicwa.org/>

¹⁸ Ibid

¹⁹ Judgment, Section O.

²⁰ Judgment, Section CC. (4)

CWS reported that it plans to research CFT participant surveys being piloted in CA; review and refine existing data reports; and is considering the implementation of designated facilitators for meetings, as opposed to leaving that responsibility with the family's social worker.

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.^{21,22}

Update: With assistance from Humboldt County DHHS and Mental Health, CA Department of Social Services, and NCCD, CWS is planning for and beginning to build a CQI program. A program manager is being hired and a comprehensive CQI Plan is expected to be created with additional input from staff and Tribes.

- 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.^{23,24}

Update: The CWS draft CQI plan proposes the creation of twice-yearly, "outward facing" CQI Forums during which CQI Program staff will present and discuss data with participants. These events will welcome youth, parents, family members, Community Task Force, and others.

- 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.^{25,26}

Update: DHHS shared the results of the review of the CWS Ombudsperson's Office during the May 2020 meeting of the Community Task Force.

²¹ Judgment, Section KK. (3).

²² Judgment, Section CC. (4).

²³ Ibid

²⁴ Ibid

²⁵ Ibid; Judgment, Section JJ.

²⁶ Judgment, Section CC. (4).

- 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.

Update: CWS plans to continue to provide data updates to the Community Task Force at each meeting. Community Task Force members will be invited to participate in the planned CWS CQI Forums.

Appendix B: Glossary of Acronyms

AG – Attorney General

CANRA – Child Abuse and Neglect Reporting Act

CAST – Child Abuse Services Team

CFT – Child and Family Team

CPRG – Child Protection Reporting Guide

CQI – Continuous Quality Improvement

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/CMS – Child Welfare Services/(electronic) Case Management System

DA – District Attorney

DHHS – Department of Health & Human Services

FTO – Field Training Officer

HCSO – Humboldt County Sheriff's Office

ICWA – Indian Child Welfare Act

MDT – Multidisciplinary team

MOU – Memorandum of Understanding

NCCD – National Council on Crime and Delinquency

RIMS – HCSO Records Management and Computer Aided Dispatch System

SDM® – Structured Decision Making

SIP – Systems Improvement Plan

Appendix C: Humboldt County Child Welfare Services System Reform Activities Roadmap, January 2020

