

June 25, 2021

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, 2020 - February 13, 2021)



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

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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, 2020 - February 13, 2021**

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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 Sheriff’s Office (HCSO) in completing agreed upon corrective actions to meet the terms of a Judgment of the Superior Court of the State of California, entered by the California Attorney General (CA AG) on behalf of the People.<sup>1</sup> The Judgment, dated February 13, 2018, includes a Memorandum of Understanding (MOU, Exhibit A) between DHHS and HCSO.<sup>2</sup> This report covers performance from September 1, 2020 to February 13, 2021.<sup>3</sup>

DHHS and HCSO contracted with a third-party compliance monitor, as required by the Judgment.<sup>4</sup> The Center for the Study of Social Policy (CSSP) serves as the third-party compliance monitor.<sup>5</sup> The Judgment required that the CA AG’s Office keep all written reports of the monitor “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.”<sup>6</sup> At CSSP’s request, DHHS, HCSO, and the CA AG (Parties) agreed to amending this item, to promote public accountability. CSSP’s bi-annual reports are available to the public.<sup>7,8</sup>

The Judgment also required that CSSP make recommendations for additional corrective actions, if any. To date, CSSP has not made recommendations for additional corrective actions but has

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<sup>1</sup> 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.

<sup>2</sup> 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>

<sup>3</sup> In some areas, data over a longer period are presented for additional information and perspective.

<sup>4</sup> Judgment, Section 4. CSSP participated in separate interviews with the CA AG’s Office and Humboldt County DHHS representatives as part of the selection process for a compliance monitor.

<sup>5</sup> CSSP works on federal, state, and county policy as well as on community, systems, and program levels to improve conditions for families and children throughout the United States. CSSP brings decades of experience working with federal, state, and local partners, parents, and youth to understand and improve experiences with and outcomes of multiple systems, including child protection. CSSP has also served as monitor, on consent of Parties, 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](http://www.cssp.org)

<sup>6</sup> Judgment, Section 4.

<sup>7</sup> Additional reports may be found at: <https://cssp.org/our-work/project/child-welfare-reform-through-class-action-litigation/#humboldt-county-department-of-health-and-human-services> Although each report is shared and reviewed with Parties prior to publication for input, CSSP independently drafts and finalizes reports.

<sup>8</sup> CSSP also prepared two sealed reports, dated February 28, 2019, and April 10, 2020, related to child fatalities.

made recommendations of strategies to sustain corrective actions by the Judgment or to achieve outstanding corrective actions required by the Judgment, given current status and progress.<sup>9</sup>

This is CSSP's sixth and final report, fulfilling obligations as compliance monitor for the Judgment herein.<sup>10</sup> The period of performance for this report is September 2020 to February 2021, marking the last six months of the Judgment dated 2018.<sup>11</sup>

During the pandemic, as first responders, HCSO deputies continued to have contact with the public. CWS social workers, especially those conducting investigations, also continued to have in-person contact with children, young people, and caregivers.<sup>12</sup> California Department of Social Services (CDSS) guidance, issued on July 1, 2020 and re-issued on November 20, 2020, resumed in-person contacts between CWS social workers and children and their caregivers, with limited exceptions, to allow for contacts by video and telephone.<sup>13,14</sup>

Over the past three years of the Judgment, CWS and HCSO worked in concert and individually to make required improvements to policies and practices. During this last year, while addressing challenges related to the pandemic, CWS and HCSO maintained systems and practices already in place as required by the Judgment.

Change is difficult for individuals and systems. As many CWS and HCSO staff can attest, involvement in *mandated* change, is even more difficult. Despite difficulties faced, both HCSO and CWS have changed because of the Judgment; the agencies accomplished many tasks related to bringing the emergency response system for children and families in Humboldt County into compliance with state policies and practices. As CSSP has presented in past reports, on multiple levels within both agencies, staff took on new responsibilities to help the systems realize improvements.

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<sup>9</sup> See recommendations in four reports on progress from September 1, 2018 – August 31, 2020 at: <https://cssp.org/class-action-litigation-humboldt-county-department-of-health-and-human-services-and-sheriffs-office/>

<sup>10</sup> Additional reports may be found at: <https://cssp.org/our-work/project/child-welfare-reform-through-class-action-litigation/#humboldt-county-department-of-health-and-human-services> CSSP independently drafts reports which are shared and reviewed with Parties for input and feedback prior to finalizing for publication.

<sup>11</sup> On December 20, 2020, the CA AG filed a Motion for Extension of Monitoring Period and Order of Supplemental Judgment seeking an extension of monitoring under the Final Judgment. On May 27, 2021, the CA AG and Humboldt County's DHHS filed a Joint Stipulation and Request for Order of Stipulated Supplemental Judgment and the Court signed an Order of Entry of Stipulated Supplemental Judgment which, among other requirements, extended the monitoring period to February 14, 2022, with the court retaining jurisdiction through June 30, 2022.

<sup>12</sup> On March 19, 2020, Humboldt County's Health Officer issued an Order directing residents to shelter in place of residence to avoid the spread of COVID-19. From September 2020 – February 2021, while some restrictions in response to the COVID-19 pandemic have been lifted, HCSO and CWS staff continue to take precautions when interacting with others in-person.

<sup>13</sup> <https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-70.pdf?ver=2020-06-17-122421-740>

<sup>14</sup> <https://www.cdss.ca.gov/Portals/9/Additional-Resources/Letters-and-Notices/ACLs/2020/20-130.pdf>

The participation of professionals and community members in regular Community Task Force meetings demonstrates the care and interest of many in the County who are dedicated to helping achieve improved outcomes for children and families and systemwide successes. The number of participants in Community Task Force meetings increased during the pandemic, as meetings were held virtually.<sup>15</sup> HCSO and DHHS/CWS have committed to continue hosting Community Task Force Meetings to regularly engage community members in their work.

CWS has been tracking aspects of the agency's performance through quantitative data reports, some newly created. CWS will also require additional qualitative data from staff, parents, caregivers, children, youth, Tribal representatives, and other partners to improve understanding and is developing capacity in key areas of responsibility. The tasks of tracking and assessing performance using both quantitative and qualitative data primarily rest with CWS' newly created Continuous Quality Improvement (CQI) program.<sup>16</sup> The program, an important accountability mechanism, requires an openness to growing, learning, and even more change on individual and systemic levels. When a CQI systems function well, all levels of staff are a source of creating, gathering, analyzing, and taking needed actions based on data.

Relatedly, the steps CWS has taken to attend to the career aspirations of the staff, building a workforce development program inclusive of input of those internal and external to the agency, are commendable. CWS intends to continue building its workforce development program to stabilize its workforce and reduce workloads.

CWS is also beginning to develop a program dedicated to Tribes, responsive to longstanding concerns and requests from Tribal representatives. While there remains significant work ahead, the commitment to work with Tribal representatives to realize mutual goals over the past year is also commendable. Tribes have recently been involved in hiring, training, and making decisions on measuring system performance. CWS is planning for periodic reporting of aggregate data regarding practices with and the experiences and outcomes of Tribal children and families to be presented to Tribal representatives for review and discussion.

### ***Key Accomplishments***

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<sup>15</sup> Judgment, Section 3.II

<sup>16</sup> CQI, Continuous Quality Improvement refers to the process for identifying strengths and challenges in service delivery through a range of evidence and using that information for learning and ongoing improvement. A feedback loop and involvement of those delivering and receiving services is key. <https://www.childwelfare.gov/topics/management/reform/soc/communicate/initiative/ntaec/soctoolkits/continuous-quality-improvement/#phase=pre-planning>



CSSP's report dated December 2020, presented key accomplishments related to the Judgment, which were achieved and maintained including by DHHS, CWS, and HCSO:<sup>17</sup>

- *Kicked off hosting the Humboldt County Community Task Force in September 2018.*  
Since 2018, DHHS/CWS and HCSO have hosted quarterly meetings of the Community Task Force. Community Task Force members were involved in reviewing new CWS policies and creating the Child Protection Reporting Guide (CPRG), to be launched in the fall of 2021.<sup>18,19,20</sup>
- *Created multiple new policies and procedures.*  
CWS updated policies and procedures related to intake, investigations, child and family team meetings, children's mental health screening, and Tribal collaboration practices. HCSO updated policy on domestic violence and attending to the needs of children during calls for service.
- *Established training on policies and procedures.*  
CWS's training unit and HCSO's Child Abuse and Neglect Reporting Act (CANRA) coordinator took responsibility to develop and delivering staff training on policies and procedures.
- *Established annual policy and procedure training requirement.*  
HCSO and CWS established training requirements for new and existing staff, as required by the Judgment.<sup>21</sup>
- *New and existing staff are up to date on annual training requirements.*  
Since 2018 both CWS and HCSO have achieved over a 90 percent rate of timely annual training for staff on policies and procedures.
- *Participated in finalizing the CAST protocol with the Humboldt County DA's Office.*  
The CAST protocol addresses processes for gathering forensic evidence in applicable cases of child abuse.<sup>22</sup> HCSO and CWS staff, along with representatives from local Tribal Social Services Departments, participated in a subcommittee which helped to finalize the protocol. The CA AG, CWS' Tribal Consultant also assisted in finalization of the document.<sup>23</sup> The protocol may be further updated with addendums from Tribes.

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<sup>17</sup> CSSP monitoring report, dated December 2020: <https://cssp.org/our-work/project/child-welfare-reform-through-class-action-litigation/#humboldt-county-department-of-health-and-human-services>

<sup>18</sup> Judgment, 3.II.

<sup>19</sup> CPRG: <https://www.surveygizmo.com/s3/5652784/1026-Humboldt-County-CPRG-Interim-Tool>

<sup>20</sup> Judgment, Section 3.CC. (7).

<sup>21</sup> Judgment, Sections EE. (5) and FF.

<sup>22</sup> CAST: <https://humboldt.gov/2413/child-abuse-services-team>

<sup>23</sup> Judgment, Section 3.B.

- *Increased coordination between CWS and HCSO and created new CANRA Coordinator roles.*

CWS assigned a program manager and HCSO assigned a deputy to the role of CANRA Coordinator. A task of the coordinators is reconciling data to make sure that reports of abuse and/or severe neglect are received and addressed by HCSO.

- *Created systems to receive complaints.*

Both agencies implemented systems to track and respond to complaints. HCSO's CANRA Coordinator is responsible for tracking complaints related to CANRA. CWS created an Ombudsperson's Office to receive and address complaints related to the provision of child welfare services.

CSSP also reported that CWS:

- *Maintained a 24-Hour hotline with immediate access to a social worker.*

CWS has received praise from partners who are pleased with the ability to directly contact a social worker when calling to report alleged child abuse or neglect. CWS data informs the agency about the number and length of calls. A very low number of calls are initially responded to by an answering service when social workers are not able to respond.

- *Addressed a large backlog of investigations.*

On February 14, 2018, there were 293 CWS investigation in backlog status.<sup>24</sup> CWS reported eliminating the backlog on February 12, 2019. While some investigations continue extend beyond 40 days, the number in backlog status remains low.

- *Increased staffing and hiring on a rotating basis.*

DHHS increased the number of CWS positions to reduce caseloads and workloads. CWS implemented hiring new social workers several times throughout a calendar year to address social worker turnover and to maintain adequate caseloads.

- *Continued to support leadership and staff.*

CWS provides the opportunity for staff to increase skills and knowledge through facilitated discussions with each other on the topics of safety organized practices and the use of safety and risk assessments through a contract with Evident Change. CQI-related technical assistance and leadership coaching are also provided.<sup>25,26</sup>

### ***Outstanding Corrective Actions***

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<sup>24</sup> Investigations open for more than 40 days after the receipt of a report are considered in backlog by CWS.

<sup>25</sup> As of November 30, 2020, NCCD is named Evident Change: [www.evident.change.org](http://www.evident.change.org)

<sup>26</sup> Judgment, Sections 3.BB.-CC.

CSSP's most recent report also pointed to outstanding corrective actions required by the Judgment. The actions predominately relate to methods of accountability and ensuring a robust CQI program. There are several requirements of the Judgment that go beyond the development and issuance of new policy to requiring the training of staff and deployment of what CWS had termed "fidelity measures" that assess the degree to which policies and procedures are reflected in practice. This remains work under development. In January 2021, CWS began to systematically collect data about practices related to Tribal children at the hotline as a beginning focus of its developing CQI program.

In February 2020, CSSP recommended a review of a valid sample of intake and investigations records to provide information on the extent to which policies were reflected in documented practices, especially given the timeframe of the Judgment, and to understand and address the ongoing reported concerns about practices. In December 2020, while conversations about the plan and timeline for the review were ongoing, it became clear that while CWS leadership may have been interested in the results of a review, CWS resources, particularly staff time needed to plan for, conduct, and report the results of the proposed intake and investigation review, were not going to be available.

Since September 2020, CWS has taken steps towards addressing several outstanding corrective actions as described below.

- *Assessing intake and investigations practice in accordance with policy expectations.*  
CWS tested an intake and investigations record review tool for a more complete quality review. The tool was developed with consideration given to CSSP suggestions. These reviews have not begun but CWS has indicated that it plans to implement reviews of intake and investigations documentation on a quarterly basis, simultaneous with the California-Child and Family Services Review (C-CFSR) conducted for reporting to the State.<sup>27</sup>
- *Assessing intake practice in accordance with policy expectations for Tribal children.*  
CWS developed a process for reviewing intake practices related to Tribal children and implemented a review over six weeks in January and February 2021. CWS reports that additional data will be gathered to inform the assessment of CWS performance in gaining information about Tribal affiliation and working with Tribes at intake. CWS reported expecting to share the results of this assessment of collaboration at intake to both CWS and Tribal Social Services staff and leadership in March 2021.
- *Ensuring timely behavioral health assessments for children.*

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<sup>27</sup> C-CFSR: <https://www.cdss.ca.gov/inforesources/child-welfare-program-improvement/child-and-family-services-review>

CWS reports that it will also begin to track screening data and qualitative information, such as reports from social workers, caregivers, youth, and others to understand and address issues with the provision of timely behavioral health assessments.

This report is primarily focused on the period September 1, 2020 to February 13, 2021 but includes data from up to several months beyond February 13, 2021, as well as historical data. It is organized as follows:

- Section II. Monitoring Activities describes CSSP’s activities to assess CWS’ and HCSO’s status in maintaining and meeting outstanding terms of the Judgment.
- Section III. Summary of Performance provides an overall summary of DHHS, CWS, and HCSO performance in completing and maintaining corrective actions of the Judgment.
- Section IV. Summary Table of Performance on all Corrective Actions September 2020 – February 13, 2021.<sup>28</sup>

CSSP staff Gayle Samuels, Judith Meltzer, and Arthur Argomaniz prepared this report for presentation to Parties and the public.

## **II. Monitoring Activities**

During this period CSSP reviewed and analyzed data gathered from HCSO and CWS to report on progress. CSSP reviewed electronic records in CWS/Case Management System (CMS) and SafeMeasures<sup>®</sup>, and accessed the data organizing system used by CWS’ CQI program in order to better understand and verify information shared by CWS.<sup>29,30,31</sup> CSSP spoke with DHHS, HCSO, CWS, and Tribal leadership, as well as CWS social workers, and Tribal Social Services staff. CSSP also observed video meetings to plan for an ICWA program, participated in Community

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<sup>28</sup> Presented in six-month periods: February 2018 through August 2018; September 2018 through February 2019; March 2019 through August 2019; September 2019 through February 2020; and March 2020 through August 2020.

<sup>29</sup> CWS/CMS is a statewide child welfare electronic case management system.

<sup>30</sup> SafeMeasures<sup>®</sup> is an Evident Change business intelligence tool, adopted statewide. SafeMeasures<sup>®</sup> 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 reflect work done and progress made, and plan for improvement.

<sup>31</sup> SDM<sup>®</sup> is an Evident Change model consisting of several assessment for use by child protection agencies and social workers to promote safety and well-being of children: <https://www.evidentchange.org/assessment/sdm-structured-decision-making-systems/child-welfare>

Task Force meetings, and spoke with the Tribal consultant and consultants from Evident Change, who are engaged as per the Judgment.<sup>32,33</sup>

### III. Summary of Performance

The following presents performance and progress by CWS and HCSO in key substantive areas of the reform work and Judgment from September 1, 2020 to February 13, 2021.

#### A. Tribal Collaboration

Humboldt County children who are identified as American Indian and who are eligible for or enrolled in a Tribe represent a significant number of the children involved in CWS investigations and cases, relative to their number in the County's population.<sup>34</sup> Among the subset of children for whom ethnicity data are available, children identified as American Indian and who are eligible for or enrolled in a Tribe have represented approximately one-third of the children involved in an investigation, a CWS family maintenance case, or a foster care case from February 28, 2018 to February 13, 2021.

##### *Children and youth involved in investigations*

CWS assigned 549 reports for investigation from September 1, 2020 to February 13, 2021, involving 835 children. Primary race and ethnicity data are only available for 67 percent (561 of 835) of the children. As depicted in Figure 1 below, the *primary race/ethnicity* of 34 percent (193 of 561) of the children is identified as American Indian; 31 percent (173 of 561) of the children for whom data was available were members of or eligible for membership in a Tribe in Humboldt County.<sup>35,36,37,38</sup>

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<sup>32</sup> Using the term for the federal Indian Child Welfare Act -

<https://www.childwelfare.gov/topics/systemwide/diverse-populations/americanindian/icwa/> - ICWA program refers to CWS' dedication of staff to primarily work with children and families of Tribes.

<sup>33</sup> Community Task Force, Judgment, Section 3.II

<sup>34</sup> According to estimates, in 2020, American Indian/Alaska Native children represent 6.9 percent of the Humboldt County child population <https://www.kidsdata.org/region/324/humboldt-county/summary#6/demographics>

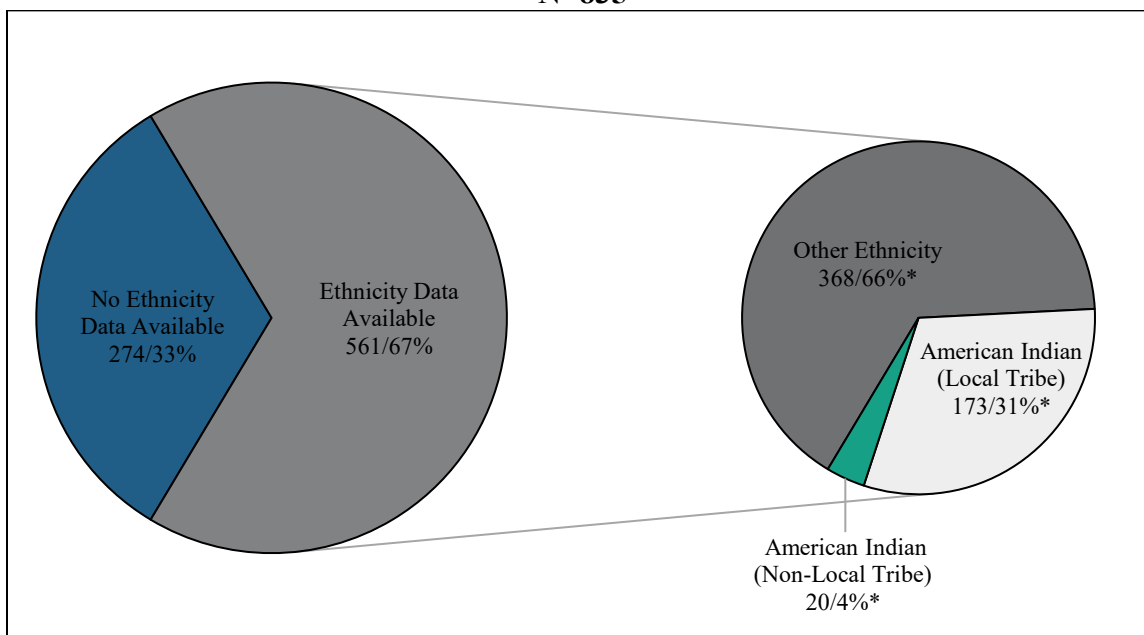
<sup>35</sup> Primary race/ethnicity, secondary race/ethnicity, and American Indian are categories in CWS/CMS which capture whether a child is identified as American Indian. CWS/CMS also contains a field to capture the child's Tribal Affiliation.

<sup>36</sup> Missing data fields are either blank (262), indicate unable to determine (3), or decline to state (8).

<sup>37</sup> 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.

<sup>38</sup> Federally recognized Tribes in Humboldt County: Big Lagoon Rancheria, Bear River Band, Blue Lake Rancheria, Hoopa Valley Tribe, Karuk Tribe, Trinidad Rancheria, Wiyot Tribe and Yurok Tribe.

**Figure 1: American Indian Children Involved in Humboldt County CWS Investigation  
September 1, 2020 to February 13, 2021  
N=835**



Source: Humboldt County CWS

\*Percentages are of the 561 children with primary or secondary race/ethnicity data available.

#### *Children and youth involved in cases*

Children whose *primary race/ethnicity* is identified as *American Indian* or who are noted in CWS/CMS as *eligible for membership* or are *members* of a Tribe represented 37 percent (84 of 225) of children involved in an in-home case from September 1, 2020 to February 13, 2021, and 33 percent (164 of 497) of children who were in foster care at any time from September 1, 2020 to February 13, 2021.<sup>39,40,41</sup>

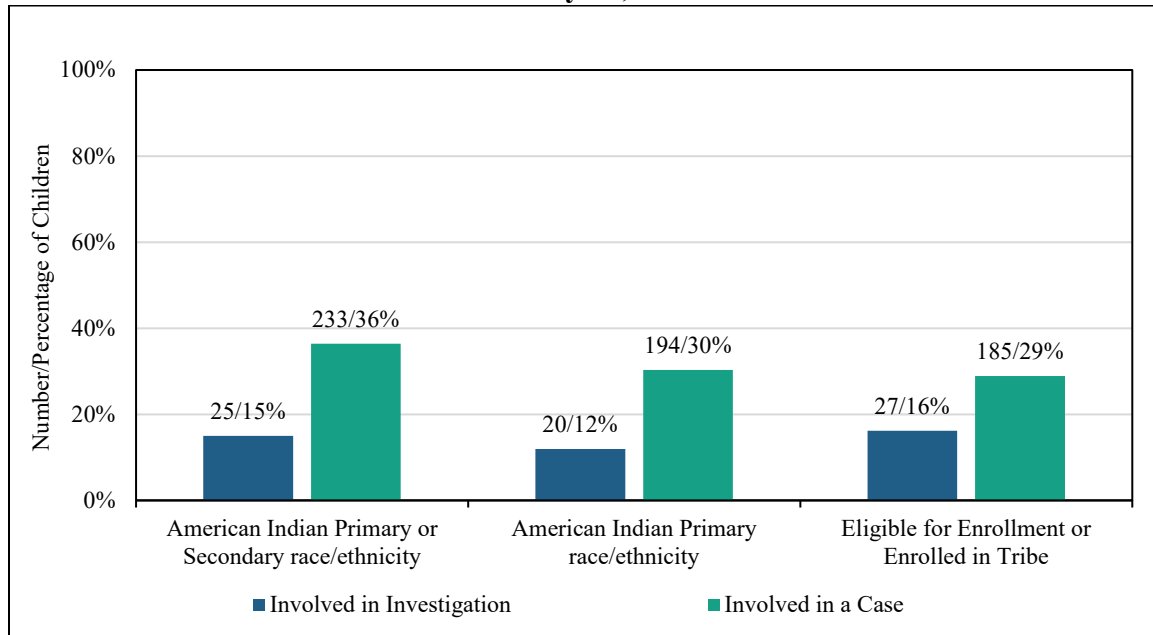
The number of children involved in an investigation or case, on February 13, 2021, and whose *primary or secondary race/ethnicity* is identified as *American Indian* is depicted in Figure 2 below. Children who are eligible for enrollment or enrolled in a Tribe are also depicted in Figure 2.

<sup>39</sup> Sixty-seven of the children involved in an in-home case were members of a Tribe in Humboldt County.

<sup>40</sup> Thirteen children with no primary ethnicity or Tribal affiliation identified were removed from the universe of children involved in a family maintenance case; and 14 children with no primary ethnicity or Tribal affiliation identified were removed from the universe of children involved in a foster care case.

<sup>41</sup> One hundred and fourteen children in foster care are identified as a member of or eligible for membership of a Tribe in Humboldt County. An additional 50 children are identified as a member of or eligible for membership of a Tribe outside of Humboldt County.

**Figure 2: American Indian Children Involved with Humboldt County CWS  
February 13, 2021\***



Source: Humboldt County CWS

\*On February 13, 2021, there were 175 children involved in a CWS investigation and 640 children involved in a CWS case, including 167 children involved in a family maintenance case and 473 children in foster care.

To align with California’s ICWA policy, the Judgment, and CWS policies, additional steps are required of social workers screening reports at the hotline. These include inquiring of each reporter to the hotline about a child’s possible Tribal affiliation; inquiring with local Tribes about membership or eligibility for membership; collaborating with Tribes to decide whether to investigate a report, and the applicable response time for an investigation; and collaborating during and about the disposition of an investigation.<sup>42</sup>

In January 2021, after developing a documentation review process, CWS’ CQI program began collecting data at intake on whether required Tribal collaboration steps were followed. Initial results are presented in Section E. of this report, Revision of Policies and Procedures. CWS plans to present results from the review, data from interviews, and ideas to sustain practices and improve others, to Tribal representatives in July 2021.

#### *County MOU with Hoopa Valley Tribe*

The Judgment required Humboldt County DHHS to engage in good faith efforts to negotiate and develop protocols (MOUs) governing the processes for collaboration that will ensure timely, shared decision making on cases involving Tribal children, with the eight federally recognized Tribes in Humboldt County.<sup>43</sup> These protocols were also to include a mutually acceptable

<sup>42</sup> Indian Child Welfare Act (ICWA): <https://www.cdss.ca.gov/inforesources/tribal-affairs/icwa>

<sup>43</sup> Judgment, Section 3.P.

procedure for the resolution of disputes when Tribal social workers and CWS are not in agreement with case plan decisions.

The Humboldt County Board of Supervisors approved the only MOU developed in response to the Judgment, between Humboldt County's DHHS and CWS and a Tribe, the Hoopa Valley Tribe. The MOU, dated February 5, 2019, expired on February 6, 2021, and can be extended for an additional term of two years upon written agreement of Parties. Representatives of the Hoopa Valley Tribe, CWS, and DHHS are working to update the MOU for presentation to the Humboldt County Council and the Hoopa Valley Tribal Council.

#### *CWS' work towards additional MOUs*

The corrective action of the Judgment addressing the negotiation of protocols with Tribes required that DHHS make good-faith efforts to negotiate and develop the protocols with each Tribe by November 2018. As described above, DHHS and one Tribe entered into an MOU. A CWS Tribal consultant was engaged to work with CWS staff and Evident Change to assist with the implementation of policies and procedures related to collaboration between Tribes and social workers.<sup>44</sup> The Tribal consultant focused on helping to create an environment and opportunities for the negotiation of protocols with Tribes; helping to build and sustain trust while there were staff changes at CWS and Tribes; and encouraging Tribal representatives to become and remain involved in the Community Task Force. The Tribal consultant's work with CWS ended in November 2020.

In March of 2020, DHHS and CWS leadership requested that the Director of CA DSS' Office of Tribal Affairs, join CWS' meetings with Tribal Directors. DHHS's goals in working with this State office are to increase collaboration with Tribes and negotiate and develop an MOU with each Tribe.<sup>45,46</sup>

On February 23, 2021, just outside the period for this monitoring report, DHHS recommended that the County's Board of Supervisors appoint two specific Supervisors to serve on a CWS Ad hoc Committee and as the Board's representatives to support government-to-government conversation with sovereign Tribal nations. The two Board Supervisors would encourage partnership between governments. The representatives from the County's Board of Supervisors would also be "responsible for contacting Tribal Chairs through the Northern California Tribal Chairmen's Association and/or attending individual Tribal meetings to provide and receive information, answer questions, and facilitate discussions to identify targeted services to better serve Native American children and families."<sup>47</sup>

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<sup>44</sup> Judgment, Section 3.O.

<sup>45</sup> <https://www.cdss.ca.gov/inforesources/tribal-affairs>

<sup>46</sup> Judgment, Section 3.N.

<sup>47</sup> Letter from DHHS-Social Services to Humboldt County Board of Supervisors, for the meeting of 2/23/2021, file #: 210230. Received from DHHS, 4/12/21.



### *CWS' outreach to Tribes*

CWS and DHHS continued to reach out to other Tribes, including to the Yurok Tribe. In September 2020, while acknowledging improvements with CWS intake, Yurok representatives sought opportunities to discuss a range of practices, specifically regarding failure to obtain required Tribal input and significantly minimized Tribal input in case practice and decision making.<sup>48</sup> This included concerns about reports being “evaluated out” or not accepted for investigations, no Tribal input on completion of SDM<sup>®</sup> forms during intake and investigation, and engagement of Tribal representatives in child and family team meetings. As described below, CWS is taking steps to collect, analyze, and share data about practice at intake and investigations, including required Tribal collaboration.

### *Practices with Tribes at intake*

CWS' CQI program staff worked with intake and investigations staff, particularly intake supervisors, to collect data on documentation of collaboration with Tribes at intake. Supervisors completed a form upon review of documentation for 72 reports involving Tribal children received across six weeks during January and February 2021.<sup>49</sup> The form captured whether required steps were taken, including searching CWS/CMS for Tribal affiliation data; contacting Tribes to verify a family's status, if applicable; making cross-reports to Tribes, including sharing applicable documents; and making joint decisions with a Tribe(s).<sup>50</sup>

Findings reflect that social workers are routinely conducting searches of CWS/CMS for information about Tribal affiliation (89%). Social workers are verifying eligibility for enrollment for applicable children (85%).

CWS' CQI program reports the study also found inconsistencies in expected practices. Those included providing the Tribe with information about a report, including those reports which are evaluated out in only 49 percent of reports; receiving information from Tribes, as collateral contacts for 70-80 percent of reports; and working with Tribes to make other decisions, such as determination of a response time for only 47 percent of reports.<sup>51</sup>

CWS is sharing this information internally with staff and externally with Tribal partners and will supplement it with qualitative data from interviews, to further understand practices and improve outcomes. CWS has set internal benchmarks of 95 percent for performance of each step related to required work with Tribes during intake.

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<sup>48</sup> Complaints were initially made in September 2020.

<sup>49</sup> This review did not capture practices with all reports. Data is not available on whether the social worker asked the reporter whether a child may be a member of or eligible for membership in a Tribe.

<sup>50</sup> While CWS developed a Tribal Collaboration Checklist, it is not routinely completed and could not be upon to produce needed data.

<sup>51</sup> Judgment, Section 3.K.

### *Building an ICWA program*

CWS continued to plan for an ICWA program during weekly meetings with Tribal Social Services representatives. These meetings also provided a forum for Tribal representative to share ongoing systemic concerns directly with CWS leadership.

The ICWA program launched in January 2021. This first phase focused on building the infrastructure of the program, co-developing the vision and priorities of the program, and identifying accountability measures with Tribal partners.

As of February 13, 2021, the CWS ICWA program was staffed by a manager; an analyst; and five supervisors who each work with four or five social workers assigned to investigations, family maintenance, or foster care cases. In addition, four cultural coaches, two social services aides, and a social worker assigned to court also support the program. Phases 2 and 3 will focus on implementing a CQI work plan with data dashboards and report cards. Work during these phases is also expected to result in a workforce development and training plan and methods for ongoing program evaluation. CWS' work to develop an ICWA program is a significant step toward improving Tribal collaboration on multiple levels. It is also responsive to years of intended actions which were never taken to reach this goal, leading to lack of trust between CWS and its Tribal partners.

### *DHHS' contracting for specialty mental health services for Tribal children and families*<sup>52</sup>

The pandemic delayed the beginning of mental health service delivery by Two Feathers Native American Family Services (Two Feathers).<sup>53</sup> A non-profit of Big Lagoon Rancheria, Two Feathers is the first Native American organizational provider of specialty mental health services in Humboldt County. It expanded work with children and families in October 2020, under the contract with DHHS. Two Feathers is currently contracted to provide services through December 2021.

## **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 staff continued to attend virtual Community Task Force meetings hosted by HCSO and DHHS as

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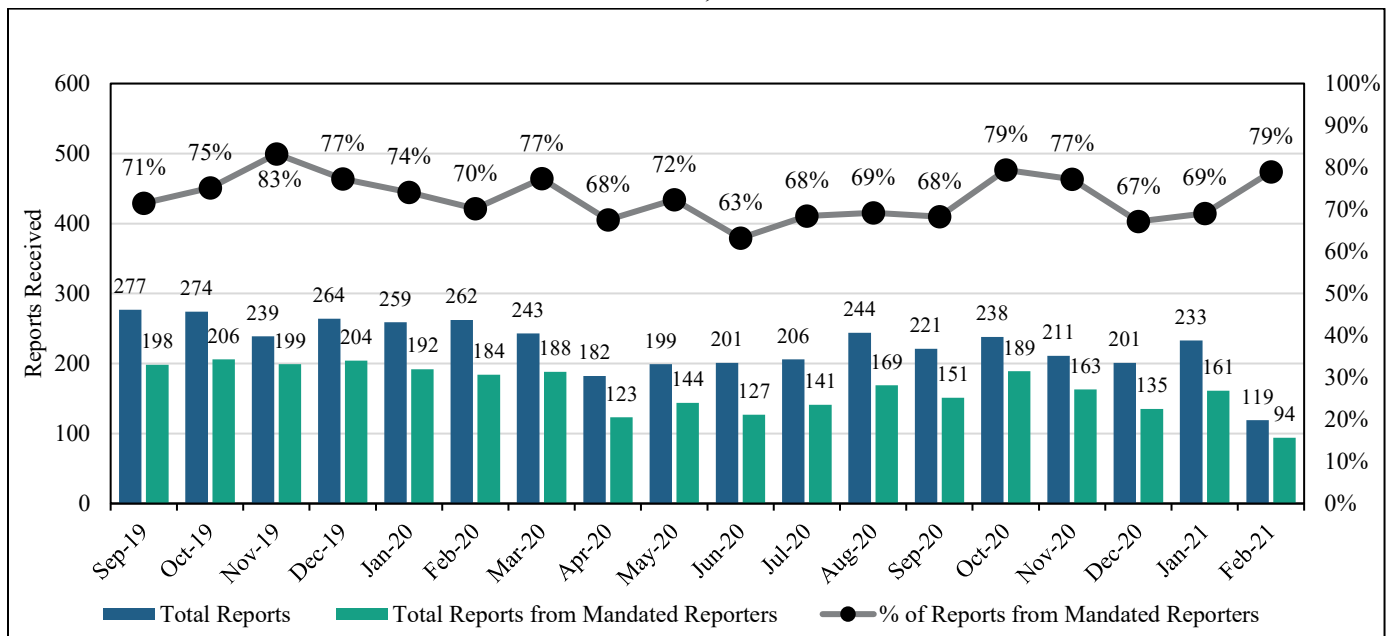
<sup>52</sup> While this important accomplishment is not part of the Judgment, it is a demonstration of DHHS' work with Tribes on behalf of children and families.

<sup>53</sup> <https://twofeathers-nafs.org>

required by the Judgment.<sup>54,55</sup> Many of the members represent mandated reporters of suspected child abuse and/or neglect who, until the pandemic, had been responsible for almost three-quarters of the reports of suspected child abuse and/or neglect to CWS, depending on the time of year.<sup>56</sup>

Figure 3 presents data from September 1, 2019 to February 13, 2021 on the total number of child abuse and neglect reports CWS received, and the portion of those reports made by mandated reporters. Consistent with national data and trends, reports to CWS have declined during the pandemic. CWS reports generating a letter notifying a mandated reporter of CWS actions in all (100%) applicable instances from September 1, 2020 to February 13, 2021.<sup>57</sup>

**Figure 3: Total and Percentage of Suspected Child Abuse and/or Neglect Reports Received by Humboldt County CWS from Mandated Reporters**  
September 1, 2019 – February 13, 2021  
N=4,073



Source: Humboldt County CWS

\*February 2021 includes February 1 – February 13, 2021

### *The DHHS - HCSO Community Task Force met virtually*

DHHS and HCSO held Community Task Force virtual meetings in November 2020 and February 2021. Each month, two shorter meetings were held as opposed to one meeting. These meetings

<sup>54</sup> Humboldt Network of Family Resource Centers: <https://www.hnfrc.org/home>

<sup>55</sup> These representatives are expected to make policy recommendations to their respective departments (Judgment, Section 3.II.).

<sup>56</sup> Mandated reporters in CA: <https://cdss.ca.gov/inforesources/ocap/mrt>

<sup>57</sup> Judgment, Section 3.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 requirement.

were well attended, including by Community Task Force members who had not attended recent in-person meetings and frontline CWS staff.<sup>58</sup>

The November 2020 meeting focused on training and demonstrations of the Child Protection Reporting Guide (CPRG) of which there was a “soft launch” in September of 2020. Developing and implementing the CPRG has been a task of CWS, with support from Evident Change, the Community Task Force members, DHHS, and HCSO. Certain sectors of professionals were given access to the CPRG before full launch, to continue testing and refinement. Consultants with Evident Change, who helped to develop and provide training sessions on use of the CPRG, hosted small group sessions that allowed attendees of the Community Task Force meeting to give additional feedback on the tool, which may be incorporated in the final website design.

During the February 2021 meeting, the last to be held pursuant to the requirements of the Judgment, CWS shared new program updates to help meet the goals of the Judgment and asked attendees to share what they felt had worked well and where the Community Task Force should focus their attention in future meetings. There were 17 meetings held since 2018 CWS reported that a range of 35-75 people attended in person and virtual meetings. CWS, DHHS and HCSO leaders communicated an ongoing commitment to continue to sustain and support the Community Task Force and its work to increase accountability and communication.

### **C. Evident Change 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.<sup>59</sup> CWS and HCSO provided documentation to CSSP showing that ongoing and new newly hired staff are up to date on training requirements at a rate of over 95 percent.<sup>60</sup> Both agencies maintain records of attendance for tracking and understanding trends in training participation.

The Judgment also includes corrective actions related to CWS’ technical assistance (TA) from Evident Change. During this period CWS’ work with Evident Change included developing, implementing, and providing training on the Child Protecting Reporting Guide, supporting CWS leadership in efforts to build a CQI culture, and continuing to provide coaching to increase fidelity to SDM<sup>®</sup> practice.<sup>61</sup> Evident Change and CWS regularly review the needs of agency staff to determine where additional TA support may be needed.

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<sup>58</sup>Agendas, notes, and materials from Community Task Force meetings may be found at: <https://humboldt.gov.org/2373/Community-Task-Force>

<sup>59</sup> Judgment, Section 3.EE.

<sup>60</sup> The pandemic delayed HCSO’s annual CANRA training for deputies from August 2020 to November 2020. HCSO deputies receive required annual training by December 2020.

<sup>61</sup> Judgment, Section 3.BB.

### *Staffing to manage workloads and working to support staff*

The Judgment required that CWS amend its contract with Evident Change to include a Workload Study to estimate the resources and number of staff needed to perform the necessary functions of the child welfare agency in compliance with laws, rules, and policies applicable to Humboldt County and the State of California. After considerable planning and preparation, 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 pandemic. The changes in a CWS social worker's activities due to the pandemic led to the decision, in consultation with the CA AG's Office, to stop the study and substitute the development of a workforce plan as an alternative.

CWS contracted with the Northern California Training Academy of the University of California at Davis to assist with building a customized career development program. A needs assessment consisting of interviews with small groups of staff and stakeholders and a survey was done to assess priorities was part of this work. The group has clarified onboarding training requirements and created a training passport for staff to use in documenting and tracking attendance.<sup>62</sup>

CWS' quarterly recruitment for vacant positions resulted in filling four social worker positions from September 1, 2020 to February 13, 2021. As of February 13, 2021, 17 of the 29 (59%) social services aide positions were filled.<sup>63,64</sup>

CWS' staffing plan allocates eight social worker positions to receive and screen reports of suspected abuse and/or neglect during business hours and each position is filled as February 13, 2021.<sup>65</sup> There were also 20 social worker positions assigned to conduct child abuse and neglect investigations, 15 are filled (including three staff on leave) and there are five vacancies.<sup>66</sup>

### *Reducing and maintaining a low number of investigations in backlog*

One of the notable accomplishments by CWS over the past three years is closing a large number of investigations in backlog, open for 40 days or more.<sup>67</sup> Since successful actions taken in 2019 to reduce a longstanding backlog, CWS has maintained a low number of investigations opened for 40 days or more; the majority of investigations now close in a timely manner.<sup>68</sup>

Figure 4 below shows the number of CWS backlogged investigations on the first day of each month from January 2020 to February 2021.

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<sup>62</sup> <https://humanservices.ucdavis.edu/capacity-building>

<sup>63</sup> Filled positions include staff on extended leave.

<sup>64</sup> CWS reports that 4 social service aide positions were reallocated to office assistant positions, which had not increased in many years, and reducing social service aide positions from 33 to 29.

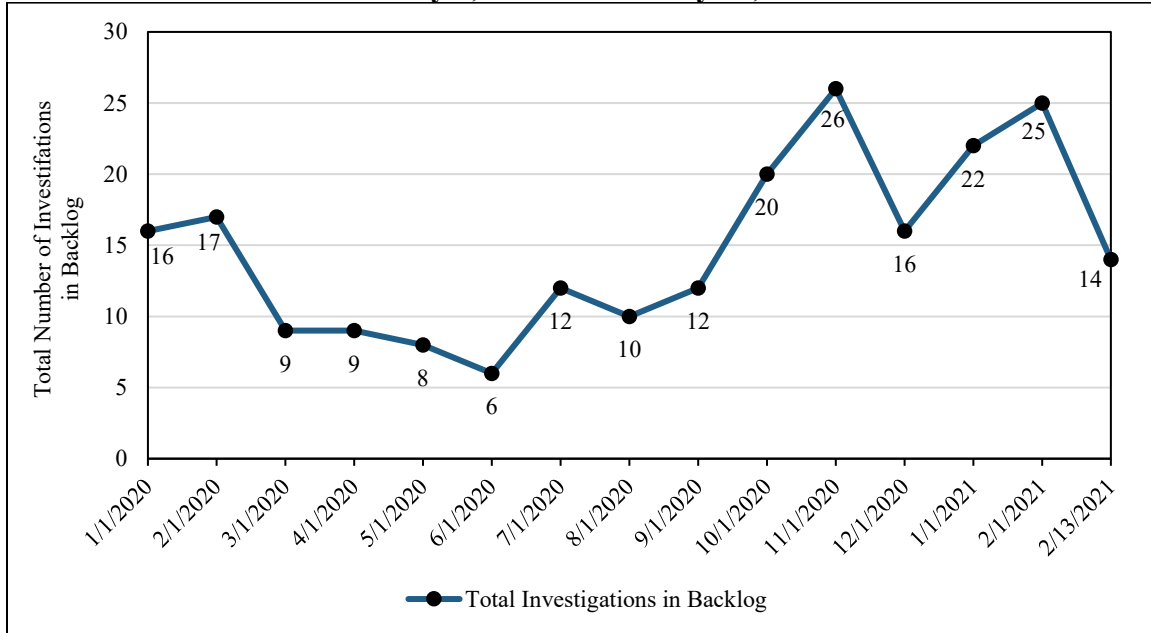
<sup>65</sup> Ibid.

<sup>66</sup> Ibid.

<sup>67</sup> Evident Change provided consultation on initial backlog reduction steps.

<sup>68</sup> CSSP Monitoring Period 2 report: <https://cssp.org/resource/humboldt-september2019-february2020/>

**Figure 4: CWS Investigations Backlog  
January 1, 2020 – February 13, 2021**



Source: Humboldt County CWS

On February 13, 2021, there were 14 investigations in backlog. Each month during this six-month monitoring period, there were no more than 26 investigations in backlog on the first day of the month. These data do not include those investigations with an approval by a supervisor to extend beyond 40 days. CWS investigations from September 1, 2020 to February 12, 2021 were open for a range of 9 to 90 days. There was no request for an extension of the investigation for over half (143 of 251) of the investigations open for 40 days.

Of the 452 investigations that closed from September 1, 2020 to February 12, 2021, 137 (30%) closed within 40 days. For an additional 108 (24%) investigations, there was both a request received prior to the 40<sup>th</sup> day of the investigation and supervisory approval was granted to extend the investigation time. The remaining 245 investigations were open for more than 40 days without an approved extension. This does not align with the CWS directive, based on an agreement with the CA AG, requiring supervisory approval for an investigation to extend beyond 40 days.

#### *Child and family team meetings*

As required by the Judgment, CWS consulted with Evident Change on the selection and implementation of a strengths-based family meeting model.<sup>69</sup> CWS issued policy on this process of case planning and decision making and provides training on preparing for and holding meetings. The meetings, expected to be held at least twice a year for each case, are a central part of the Humboldt County Practice Model, a guide for CWS social workers. Child and Family Team

<sup>69</sup> Judgment, Section 3.M.

meetings are occurring, though not always in person. CWS can provide limited quantitative data about meeting occurrence and has reported that from September 1, 2020 to February 12, 2021, 295 meetings were held for 259 children. This is a much lower rate than expected given the population involved with CWS. Additional quantitative and qualitative data about this integral part of the Humboldt County Practice Model will assist CWS in gaining an understanding of the status of implementation and impact of Child and Family Team meetings. CSSP recommends that an area of focus for the CQI program should be collecting additional data on Child and Family Team meetings for all cases in which they are applicable and required as well as qualitative information on the engagement of family members and other participants, recommended practices during the meeting, and effects of the meetings on outcomes such as permanency.

#### **D. Implementing a New Emergency Response System**

CWS' 24-hour emergency response system with social workers directly receiving reports of suspected child abuse and/or neglect, as required by the Judgment, continues to operate.<sup>70</sup>

CSSP has expressed concern that the current process for staffing the hotline after 5:00 PM and during weekends or, "on-call", is not sustainable. However, CWS has maintained the on-call requirement for social workers and supervisors, and the 24-hour hotline remains in place and is functional. From September 2020 to February 2021, in response to concerns raised by social workers and supervisors not familiar with intake and investigations but now occasionally serving in those roles, CWS offered weekly drop-in meetings to further support and increase the comfort and effectiveness of staff serving in the on-call capacity.

CWS reports receiving 1,213 calls at the hotline from September 1, 2020 through February 13, 2021 regarding suspected abuse and/or neglect.<sup>71</sup> Sixty-three percent (771) of the 1,213 reports were "evaluated out", deemed as not reaching the legal threshold for an investigation or containing allegations already under investigation by CWS.

The agency reports, based on information provided at the hotline, referring 97 families with evaluated out reports to Family Resource Centers which provide a range of resources and referrals for families. The remaining 452 of the 1,213 (37%) reports from September 1, 2020 through February 13, 2021 were assigned for investigation.

Figure 5 below shows the number of child abuse and neglect reports CWS received over a longer period, September 1, 2019 to February 13, 2021. The number of reports not assigned to a social

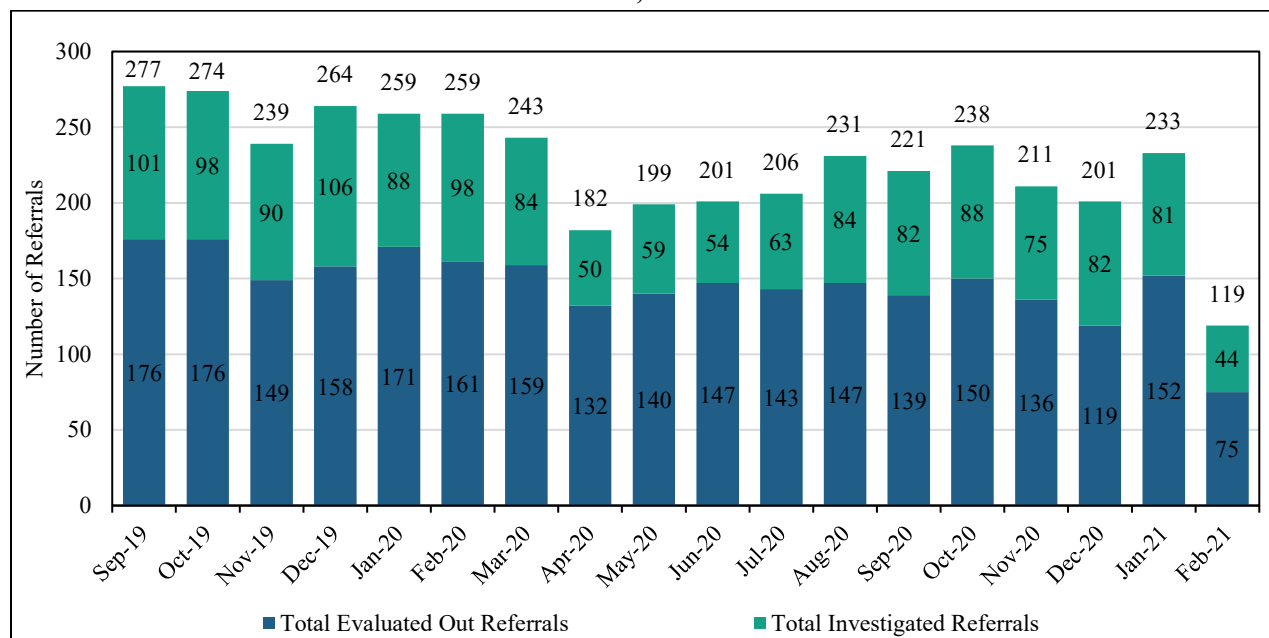
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<sup>70</sup> Judgment, Section 3.F.

<sup>71</sup> 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 in progress, the new report is given a number but added to the open investigation, as opposed to creating an additional investigation record.

worker for investigation or “evaluated-out” and the number of reports assigned to a social worker for investigation each month are also shown.

**Figure 5: CWS Reports of Suspected Child Abuse and/or Neglect  
Received, Evaluated Out, or Assigned for Investigation  
September 1, 2019 to February 13, 2021  
N=4,057**



Source: Humboldt County CWS

\*February 2021 includes February 1 – February 13, the end of the 3-year stipulated judgment

### *CWS cross-reports to law enforcement agencies*

CWS social workers who receive reports at the CWS hotline can electronically send reports or “cross-reports” and other data to local law enforcement. CWS reports sending 771 reports to local law enforcement from September 1, 2020 to February 13, 2021.<sup>72</sup> Table 1 below shows the number and percent of reports CWS made to local law enforcement agencies.<sup>73</sup> CWS also sent reports to other counties in California and other states.

<sup>72</sup> Some referrals were cross reported to more than one agency.

<sup>73</sup> CWS and HCSO have agreed that CWS will forward all reports with allegations of child abuse and/or severe neglect to HCSO.



**Table 1: CWS Cross Reports to Local Law Enforcement**  
**September 1, 2020 – February 13, 2021**  
**N=771\***

Receiving Agency	Number and Percent of Reports
Humboldt County Sheriff's Office	369 (48%)
Eureka Police Department	187 (24%)
Arcata Police Department	88 (11%)
Fortuna Police Department	83 (11%)
Rio Dell Police Department	32 (4%)
Ferndale Police Department	10 (1%)
Hoopa Valley Tribal Police Department	2 (<1%)

Source: Humboldt County CWS

\*CWS sent reports to multiple agencies

#### *HCSO cross-reports to other law enforcement agencies*

The Judgment required that HCSO forward reports of suspected abuse to the appropriate jurisdiction.<sup>74</sup> Between September 1, 2020 and February 14, 2021, HCSO received 46 child abuse reports that fell outside of their jurisdiction. Forty of the reports were cross reports from CWS and thirty-two were electronically transferred to appropriate jurisdiction without an HCSO case being generated.<sup>75</sup> Four of these reports were assigned to Deputies who conducted a preliminary investigation, determined the matter fell into a municipal jurisdiction within Humboldt County, completed a report, and forwarded the matter to the appropriate agency. HCSO forwarded four additional reports to the appropriate agency outside of Humboldt County or to the California Highway Patrol.

There were six direct reports of suspected child abuse made to HCSO and each reportedly occurred outside of HCSO's jurisdiction. HCSO reports taking a report for each and forwarding to the agency with jurisdiction.

#### *The majority of reports to CWS do not require an immediate response*

CWS intake determined that the overwhelming majority, (365 or 81%) of the 452 reports assigned for investigation from September 1, 2020 to February 13, 2021, required a social worker to respond

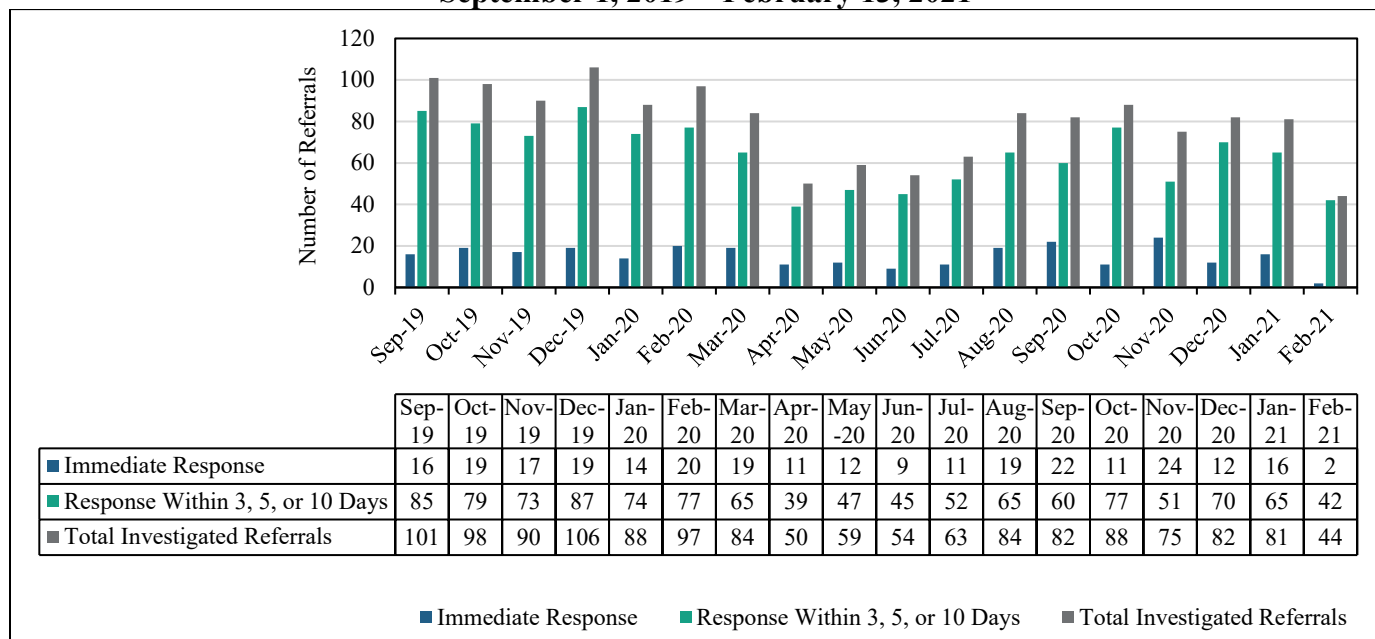
<sup>74</sup> Judgment, Section 3.Y.

<sup>75</sup> Arcata Police Department, Eureka Police Department, and Fortuna Police Department. Fortuna Police Department dispatches for the Ferndale Police Department and Rio Dell Police Department.

within 3, 5, or 10 days; the remaining 19 percent (87) of the 452 reports were deemed to warrant an immediate response from CWS.

Figure 6 below shows the CWS assigned response times for CWS investigations from September 2020 to February 13, 2021, showing an increase in the proportion of investigations assigned for response within 3, 5, or 10 days and a decrease in those deemed to require an immediate response from CWS.

**Figure 6: Assigned Response Times for CWS Investigations  
September 1, 2019 – February 13, 2021**



Source: Humboldt County CWS

\*February 2021 includes data for February 1 – February 13, 2021

According to CWS data, from September 1, 2020 – February 13, 2021, CWS investigators met the response time designated at the hotline at a rate of 91 percent. CWS reports distributing weekly reports of performance on meeting investigation response times to the CWS Director, as well as administrative, and supervisory staff for tracking and follow-up.

## E. Revision of Policies and Procedures

CSSP previously reported that CWS' steps towards creating and applying fidelity measures for policy implementation and developing processes to assess performance on policy mandates had not yet been completed. As part of its CQI program, CWS is developing the capacity to develop and conduct reviews or studies and report on performance of practices with respect to its policy and procedure expectations. However, this agency-wide responsibility remains in early development.

### *Data on mental health screening and referrals*

According to CWS policy, a behavioral health screening is to be provided to all children/youth involved with CWS while they remain at home after an investigation or are placed in foster care.<sup>76</sup> The policy further states that the screening is to be completed within 30 days of the opening of a case, and annually thereafter. According to policy, when a child is affiliated with a Tribe, social workers are to contact the Tribe to jointly complete the screening. If the screening indicates the need for additional assessment, CWS forwards a referral to DHHS' Children's Behavioral Health Services. The assessment may result in the provision of behavioral health services.

The Judgment required that CWS provide the Attorney General's Office with documents for their review and input relating to CWS' work to ensure that children receive mental health services when needed, and in a timely manner.<sup>77</sup> CWS met the requirement to provide documents within 30 days and has since worked to develop the capacity to electronically track the mental health screening and results for each child. CWS sends screening information to Humboldt County's Children's Behavioral Health Services, including for those children whose screening result indicates the need for further assessment. The date of the referral to Children's Behavioral Health is captured when the information is sent. CWS staff have been oriented to the process for entering these data. CWS will gather baseline data to establish annual goals for timely behavioral health screenings and referrals. CWS also worked to make sure there would be a smooth transition to the Child and Adolescent Needs and Strengths (CANS) Assessment tool which is being implemented statewide.

The process described above helps to inform CWS' goals for timely screening of children but does not respond to the question of timely access to mental health assessments and any needed intervention. Additional data are needed to understand the status of timeliness of behavioral health assessments for children. CWS reports that while these data are not routinely collected, it is possible to work with Children's Behavioral Health to receive aggregate data on the date from CWS' referral to Children's Behavioral Health to the date of the assessment of the child by Children's Behavioral Health, to better understand the status of the goal to provide timely mental health assessments to children.

### *CWS' Continuous Quality Improvement program*

CWS' Deputy Director of Performance Management is directly responsible for CWS' newly formed CQI program, which officially launched on February 1, 2021. The manager of the CQI program is responsible for the Ombudsperson's Office and the C-CFSR, a state requirement which provides a range of important qualitative data for use on state, county, and local levels.<sup>78</sup> The

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<sup>76</sup> Policy number CWS 09-67 Mental Health Screening Tool (MHST 2.0) and Request for Access to Services.

<sup>77</sup> Judgment, Section 3.C.

<sup>78</sup> C-CFSR: <https://www.cdss.ca.gov/inforesources/child-welfare-program-improvement/child-and-family-services-review>

creation of a CQI program is a goal identified in CWS' Systems Improvement Plan (SIP), which addresses the entirety of the CWS system.<sup>79</sup>

In June 2020, CSSP reported that it was important that CWS participate in building, conducting, analyzing, and acting upon the results of a review of intake and investigations practices to fulfill requirements of the Judgment. CWS has stated that some requirements of the Judgment are more extensive than those of the state. The new CQI program took responsibility for responding to some outstanding corrective actions of the Judgment which require CWS to *ensure* certain expected practices or outcomes. The program is also responsible for tracking and analyzing systems and practices related to new, updated, and existing policies.

CWS tracks several data elements related to the C-CFSR indicators; hotline calls; SDM<sup>®</sup>; cross reports to law enforcement; timeliness of investigation documentation; timeliness of seeing children during an investigation; time to completion of investigations; staff vacancy rates; and supervised visits. CWS' CQI program manual, dated February 2020, is one of the start-up activities of the program, which also worked to identify data items or "Key Performance Indicators" to track for each program.

In May 2021, CWS identified the first annual Key Performance Indicators (KPIs) for monthly tracking by all staff individually and during unit, program, all staff, and leadership meetings. Each program identified three to five key indicators for the 2021 calendar year. Examples of the 2021 KPIs include: roll-out of Working With and Across Differences equity training for all staff, Tribal collaboration at key decision points, increased use of SafeMeasures<sup>®</sup>, increased frequency of Child and Family Team (CFT) meetings, timely screening of children and referrals to Behavioral Health, and timely court reports.

The CQI program reported accomplishing the following, since September 2020, when a new manager started:<sup>80</sup>

1. Developed a process for reporting and capturing systemic issues in any CQI process.
2. Assisted the Ombudsperson's Office in enhancing feedback provided to program staff by identifying whether the complaint category is a common theme or specific to staff person (if identified) who may benefit from additional coaching.
3. Partnered with CDSS to provide qualitative data from interview, in addition to data from C-CFSR reviews. Data will be shared to Executive Leadership quarterly with program recommendations.

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<sup>79</sup> State Law (AB 636) established the California-Child and Family Services Review (C-CFSR) outcome and accountability system. C-CFSR requires California counties to complete a Self-Assessment Report and develop a System Improvement Plan (SIP) to "redesign" CWS systems and improve outcomes.

<sup>80</sup> The manager transitioned from a DHHS position, worked for CWS part-time in September 2020, and transitioned to full-time in October 2020.

4. Facilitated the System Improvement Plan, met with staff, and scheduled stakeholder meetings to collaborate on the annual review for the SIP.
5. Engaged in updating the Child Fatality/Near Fatality Policy and Procedures.

The following is a summary of steps taken by CWS since September 2020 and plans in place to understand practices related to requirements of the Judgment.

In addition to conducting the C-CFSR as required by the State on a quarterly basis and continuing to support supervisory case reviews for fidelity to SDM<sup>®</sup>, CWS has proposed adding several activities. Focused studies, such as the Tribal Collaboration Study at intake described below, and a case review tool for intake and investigation, supplemental to the C-CFSR are expected to be ongoing CQI audit methods.

#### *CWS' Tribal collaboration study at intake*

To respond to questions regarding outcomes for expected collaboration with Tribes at intake, CWS' CQI developed a tool for supervisors to capture data upon review of reports and records which were recently compiled by a social worker. This process also involved immediate feedback to the social worker, as needed. CQI collected data at intake from January 1 to February 18, 2021.

CWS determined that this additional work for supervisors, in conducting the review, could not be sustained. Going forward, data for Tribal collaboration at intake will be collected on a quarterly basis by an analyst. CWS reports that CQI staff will offer technical support and assistance in building a plan for sustaining the review.

#### *CWS planning to capture data from intake and investigations records*

The CQI program developed an investigations review tool and plans to apply it to a review of investigations closed in March and April.<sup>81</sup> CWS reports that CQI, in collaboration with program managers and supervisors, plans to interview CWS and Tribal Social Services staff in the spring of 2021 about their experiences and deliver a final report to CWS and Tribes in the summer of 2021. CWS did not provide preliminary data for this report.

As with data collection for Tribal collaboration at intake, data for the supplemental case record review of intake and investigations records will be collected by an analyst on a quarterly basis. CWS reports that CQI will offer technical support and assistance in building a plan for sustaining these reviews.

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<sup>81</sup> CWS reports that at the time of publication of this report, data collection was ongoing.

## F. Complaint System

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.<sup>82</sup>

### *CWS' Ombudsperson's Office*

As previously reported, CWS began to act on recommendations to improve the Ombudsperson's Office in response to a 2019 review of the Office, conducted by DHHS' Quality Management Services' (QMS), as well as recommendations from the Humboldt County Transition-Age Youth Collaboration (HCTAYC).<sup>83</sup>

### *CWS' Ombudsperson's Office - providing clarity*

The newly hired CWS CQI manager reviewed all recommendations concerning the CWS Ombudsperson's Office, consulted with the CA DSS Office of the Foster Care Ombudsman, Humboldt County CWS Executive Leadership, Humboldt County CWS Social Worker Supervisors, and the DHHS QMS Director about possible improvements. The manager also attended a conference of the United States Ombudsman Association to learn about best practices and recommended that the agency adopt a clear model of practice for the Office.<sup>84</sup> A specific model would help to define the function, clarify roles, and set standards and clear expectations for the Office. CWS has adopted the organizational ombudsman model. This model works with individuals and organizations to resolve concerns on a case level and identifies systemic concerns to be addressed by leadership. CWS reports intending to develop Standards of Practice for its Office to align with the United States Ombudsman Association and International Ombuds Office standards.<sup>85</sup> In addition to the actions above to clarify the role of the Office, new CWS staff will be presented with information about the office Ombudsperson's during orientation.

### *CWS' Ombudsperson's Office - collecting and sharing data*

CWS developed a system for collecting electronic data from the Ombudsperson's Office and reporting aggregated data. Key internal performance indicators for the Office include developing a screening tool (by July 2021), revising policy and procedures (December 2021), and developing standards of practice (by December 2021), with timelines identifying areas of focus for the calendar year.

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<sup>82</sup> Judgment, Sections 3.GG. and HH.

<sup>83</sup> CWS reports planning to meet with HCTAYC members to provide follow-up on the HCTAYC recommendations.

<sup>84</sup> The United States Ombudsman Association (USOA) is a national organization for public sector ombudsman professionals with members from ombudsman offices in local, state, and federal governments, and affiliated ombudsman offices; <https://www.usombudsman.org/>

<sup>85</sup> Information about the International Ombudsman Association may be found at: <https://www.ombudsassociation.org/>

### *CWS' Ombudsperson's Office - improving communication*

The DHHS QMS review of the Ombudsperson's Office resulted in a recommendation that CWS create a feedback loop to social workers and their supervisors, to include a complaint summary, findings, and recommendations to improve communication. The Ombudsperson's Office process now involves the completion of a template designed to capture information on the complaint resolution and recommendations. This information is sent to staff for each complaint received, regardless of whether an investigation was completed.

### *CWS' Ombudsperson's Office - administrative practices*

CWS developed a decision making form for the Ombudsperson's Office in consultation with CWS program staff. This co-creation facilitated further understanding of the role of the Office. The form is used upon the receipt of a complaint to decide whether the complaint is appropriate for investigation by the Office and next steps in responding to the complaint. Another form, adapted from CWS' Fair Hearing process, is design to be completed by the CWS supervisor upon receipt of a complaint and to encourage and facilitate problem-solving at the frontline level.

Additional recommendations from the DHHS QMS review have been implemented, such as steps to increase the visibility of the Office, especially for youth and young adults, and to share data agency-wide. Steps are also being taken to protect the privacy of CWS staff who are part of an investigation/"inquiry" or any other steps taken by the Ombudsperson's Office involving a case.

Data provided to CSSP by CWS indicate that the Ombudsperson's Office began 38 inquiries in response to 71 persons or complainants who contacted the Office from September 1, 2020 to February 13, 2021. The Ombudsperson's Office reports solely providing information to eight of the complainants; determining that the concerns of 17 were not applicable to the CWS Ombudsperson's Office; and being unable to contact eight additional complainants to gather necessary information. Table 2 below shows the Office's response to complainants from September 1, 2020 to February 13, 2021.

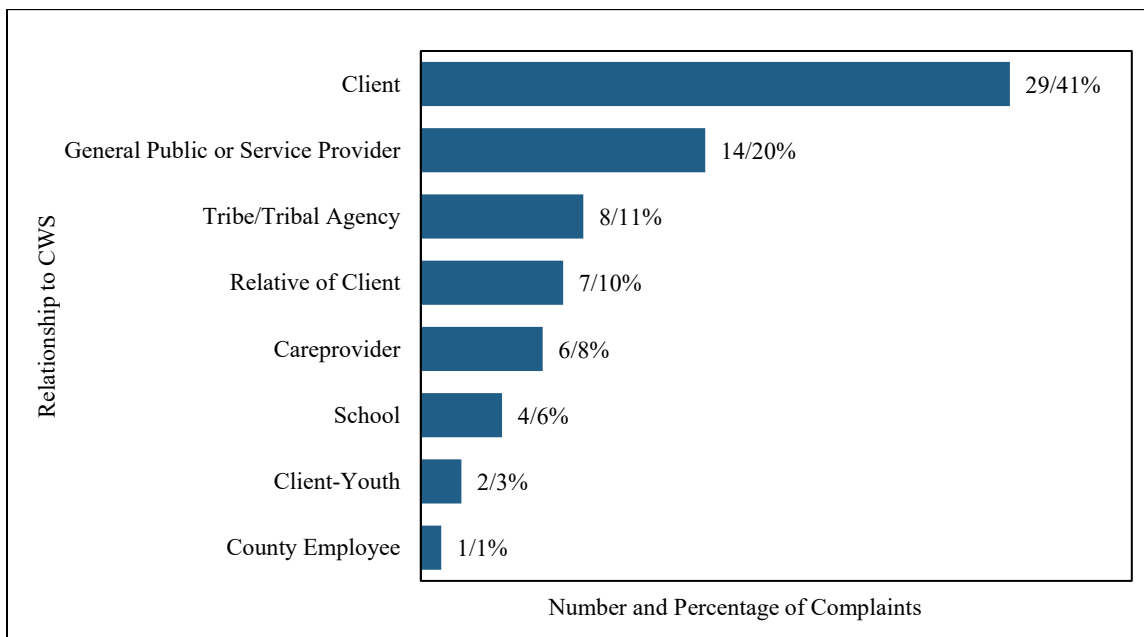
**Table 2: Ombudsperson's Office Actions in Response to Complainants**  
**September 1, 2020 – February 13, 2021**  
**N=71**

<b>Number of Complainants</b>	<b>Ombudsperson's Office Actions</b>
38	<b>Further inquiry</b> needed
8	Provided <b>information</b>
17	Determined <b>not applicable</b> to Office
8	Attempted to but <b>unable to contact</b> complainant

Source: Humboldt County CWS

Complaints to the Ombudsperson’s Office most often came from parents, the general public or service providers, a representative of a Tribe(s), or a relative of someone involved with CWS. Figure 7 below shows the complainant affiliations.

**Figure 7: CWS Ombudsperson Complainant Affiliation**  
**September 1, 2020 – February 13, 2021**  
**N=71**



Source: Humboldt County CWS

CWS provided data from April 2018 to February 23, 2021 indicating the reasons for most complaints to the Ombudsperson’s Office were categorized as related to case plan/case management/case progress, communication/coordination, or policy and procedure concerns. From September 1, 2020 to February 13, 2021, the reason for most complaints to the office were categorized as related to plan/case management/case progress or intake/investigation/removal.

Upon inquiry, the Ombudsperson’s Office’s found most of the complaints to be unfounded (22), a determination that existing policies, procedures, and/or practices were appropriately followed. The Ombudsperson’s Office determined that nine of the complaints were founded. Table 3 below outlines the findings from complaints made to the Ombudsperson’s Office’s from September 1, 2020 – February 13, 2021.



**Table 3: Findings from Inquiries Made About Complaints to CWS Ombudsperson's Office  
September 1, 2020 – February 13, 2021  
N=38**

Finding	Number of Complaints
Unfounded	22
Inconclusive	3
Partially founded	4
Founded	9

Source: Humboldt County CWS

*HCSO continued to track complaints related to CANRA*

The HCSO 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 135 calls or persons visiting their office from September 1, 2020 to February 14, 2021 with a complaint. None of the complaints involved a case related to CANRA.

**IV. 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
<b>Memorandum of Understanding ("MOU") and Inter-Agency Coordination</b>							
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.	<b>May 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per formal written request made by CWS</b>	<p><b>A. (1) Partially Completed</b> CWS circulated policy and procedures on cross reporting on 5/9/2018.</p> <p>CWS expects to finalize Intake policy by 10/12/2018.</p> <p>CWS circulated the MOU to staff 2/15/2018.</p>	<b>A. (1) Completed policy revision</b> 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.	<b>March 16, 2018</b>	<b>A. (2) HCSO Completed policy revision 3/14/18</b> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
<b>Child Abuse Services Team (CAST) Protocol and Collaborative Processes</b>							
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.	<b>Ongoing</b>	<b>B. Completed</b> 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>B. Completed</b> 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>B. Completed</b> 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>B. Completed</b> 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>B. Completed</b> Defendants are invited to and participate in the Humboldt County CAST Advisory Board which continues to meet monthly.  Humboldt County DA's Office released the updated CAST Protocol on May 1, 2020, final signatures are dated July 2020.	<b>B. Completed</b> Defendants are invited to and participate in the Humboldt County CAST Advisory Board which met monthly from September 2020 – February 2021.
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	<b>February 20, 2018</b>	<b>B. Not completed</b> The CAST protocol has not yet been finalized by the Humboldt County District Attorney's CAST Advisory Board. <sup>86</sup>	<b>B. Not completed</b> The Humboldt County District Attorney's Office has not finalized the CAST protocol.	<b>B. Not completed</b> The Humboldt County District Attorney's Office reported to HCSO that the protocol is finalized except for signature(s) from Tribes.	<b>B. Not completed</b> The Humboldt County District Attorney's Office reported protocols or MOUs require addendum and agreement from each Tribe.	<b>B. Completed May 1, 2020</b> The CAST protocol is final. Addendums from Tribes may be added.	

<sup>86</sup> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
protocol within seven days of completion for review.							
B. If the CAST protocol is not finalized within six months of the entry of Judgment, Defendants shall meet and confer with the Attorney General's Office to discuss the status of the protocol, timeframe for completion, and additional steps Defendants can take to address coordination of CAST interviews to the extent any are needed.	<b>August 13, 2018</b>	<b>B. Completed</b> CWS has developed a protocol for accessing CAST while awaiting a final protocol. Defendants have conferred with the CA AG. <sup>87</sup>	<b>B. Not completed</b> CWS and HCSO have been in communication with the AG regarding the status of the protocol, timeframe for completion, and the steps CWS is taking to coordinate CAST interviews while without a finalized CAST protocol.	<b>B. Not completes</b> The Humboldt County DA's Office 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>	<b>B. Not Completed</b> Following a meeting between the DA and 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.	<b>B. Completed May 1, 2020</b> The CAST protocol is final as of May 1, 2020 with signatures dated July 2020.	

<sup>87</sup> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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	March 16, 2018	<p><b>C. Completed protocol 3/16/18</b> CWS and Communication with Children's Mental Health/CMH Policy and Procedure and Mental Health Screening Tool (MHST) and Request for Access to Services Policy and Procedure.</p> <p>CWS and CMH developed an agreement for a multi-disciplinary team (MDT).</p>	<p><b>C. Implementation Incomplete</b> No system-wide data are available on CWS ensuring coordination of mental health services.</p>	<p><b>C. Implementation Incomplete</b> No system-wide data are available on CWS ensuring coordination of mental health services and other community-based services. Anecdotally, there have been complaints about a lack of coordination and delays accessing appropriate services, especially for adolescents presenting with elevation risk of harm to themselves.</p>	<p><b>C. Implementation Incomplete</b> No system-wide data are available on CWS ensuring coordination of mental health and child welfare services.</p>	<p><b>C. Implementation Incomplete</b> No system-wide data are available on CWS ensuring coordination of mental health and child welfare services.</p>	<p><b>C. In Process</b> During training on the implementation of an updated mental health screening tool (with aspects of a statewide tool which is in early implementation) staff are reminded to enter data on screenings and send all results to Children's Behavioral Health which arranges assessments, as needed.</p> <p>These data will be tracked and used for any needed improvements to screening and referring children for behavioral health services.</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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
of the entry of Judgment,) CWS shall provide the Attorney General's Office with documents relating to this section for review and input.							
<b>Implementation of New Emergency Response System and Revision of Policies and Procedures by Defendant CWS</b>							
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.	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per formal written request made by CWS</b>	<b>D. Completed</b> 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	<b>June 14, 2018, extended to June 25, 2018</b>	<b>E. Completed policy development</b> CWS developed Policy and Procedure on Mandated Reporter and circulated to staff on 6/26/2018  CWS developed Policy and Procedure on		<b>E. Implementation Incomplete</b> 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	<b>E. Implementation Incomplete</b> 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	<b>E. Implementation Incomplete</b> Social workers are aware of this policy. CWS reports during this period there were 28 reports regarding children in out-of-home care, 15 were evaluated out and	<b>E. Implementation Incomplete</b> Social workers are aware of this policy. CWS reports during this period there were 24 reports regarding children in out-of-home care, 15 were evaluated out and 9

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
relating to investigations of suspected child abuse in out-of-home care facilities, and the Welfare & Institutions Code and Division 31 regulations.		Reports on Open Investigations or Cases and circulated to staff on 6/26/2018.		12 were 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>	19 were assigned for investigation.  CWS has not taken steps to review and ensure this practice.	13 were assigned for investigation.  CWS has not taken steps to review and ensure this practice.	were assigned for investigation.  CWS has not taken steps to review and ensure this practice but reports planning to conduct to review in the future.
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	March 15, 2018 and ongoing	F. Completed 3/16/2018	F. Maintained	F. Maintained	F. Maintained	F. Maintained	F. 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
system that connects callers who report suspected child abuse or neglect directly to screeners.							
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	<b>G. Completed 6/4/2018</b> CWS has fully transitioned to an electronic data entry system for intake. Social worker screeners enter information, including on the Web SDM <sup>®</sup> assessment tool in CMS.	<b>G. Maintained</b>	<b>G. Maintained</b>  <i>See Recommendation 3. Have managers perform QA reviews on a set number of intake reports each month.</i>	<b>G. Maintained</b> Managers are beginning to perform QA reviews on a set number of intake reports each month.	<b>G. Maintained</b>	<b>G. Maintained</b>
H. CWS shall ensure timely cross-reporting to law enforcement agencies and the District Attorney's ("DA") office.	June 14, 2018 and ongoing	<b>H. Completed 6/4/2018</b> 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.	<b>H. Maintained</b> CWS sent 981 cross-reports sent to law enforcement agencies and the DA's office  Ongoing quality improvement is needed to avoid	<b>H. Maintained</b> CWS sent 1,055 cross-reports to law enforcement agencies and the DA's office.  Ongoing quality improvement is needed to avoid	<b>H. Maintained</b> CWS sent 985 cross-reports to law enforcement agencies and the DA's office.  Ongoing quality improvement is needed to avoid duplication of	<b>H. Maintained</b> CWS sent 889 cross-reports to law enforcement agencies and the DA's office.  Ongoing quality improvement is needed to avoid duplication of	<b>H. Maintained</b> CWS sent 771 cross-reports to law enforcement agencies and the DA's office.  Ongoing quality improvement is needed to avoid duplication of



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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
			duplication of cross-reports.	duplication of cross-reports.	cross-reports and make sure each report is received and properly assigned.	cross-reports and make sure each report is received and properly assigned.	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.	<b>June 14, 2018</b> and ongoing	<b>H. (1) Completed 6/4/2018</b> CWS implemented a system for immediate electronic cross reporting of reports of abuse and/or severe neglect to the DA's Office, Sheriff's Office, and other law enforcement agencies.	<b>H. (1) Maintained</b>	<b>H. (1) Maintained</b> See above.	<b>H. (1) Maintained</b> See above.	<b>H. (1) Maintained</b> See above.	<b>H. (1) Maintained</b> See above.
H. (2) CWS shall make cross-reports to the DA's office in accordance with Penal Code section 11166, subdivision (j).	<b>June 14, 2018</b> and ongoing	<b>H. (2) Completed 6/4/2018</b> CWS' electronic cross reporting system automatically sends a copy of cross reports to law enforcement to the Humboldt County DA's Office.	<b>H. (2) Maintained</b>	<b>H. (2) Maintained</b>	<b>H. (2) Maintained</b>	<b>H. (2) Maintained</b>	<b>H. (2) Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.	<b>June 14, 2018</b> and ongoing	<b>H. (3) Completed 6/4/2018</b> CWS' electronic cross reporting system automatically sends a copy of cross reports to law enforcement to the Humboldt County DA's Office.	<b>H. (3) Maintained</b>	<b>H. (3) Maintained</b>	<b>H. (3) Maintained</b>	<b>H. (3) Maintained</b>	<b>H. (3) Maintained</b>
H. (4) On a weekly basis, a supervisor shall review all reports to ensure that timely cross-reporting has been completed.	<b>June 14, 2018</b> and ongoing	<b>H. (4) Completed 4/23/2018</b> A CWS program manager reviews all cross reports for timeliness.	<b>H. (4) Maintained</b>	<b>H. (4) Maintained</b>	<b>H. (4) Maintained</b>	<b>H. (4) Maintained</b>	<b>H. (4) Maintained</b>
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.	<b>June 14, 2018</b> and ongoing	<b>H. (5) Completed policy development 6/4/2018</b> CWS' CWS/CMS system captures data the investigator enters regarding contact with the Sheriff's Office.	<b>H. (5) Implementation Incomplete</b> QA steps are needed to ensure these practices.	<b>H. (5) Maintained</b> QA steps are needed to ensure these practices.  CSSP will collect data and report on joint response practice in the subsequent report.	<b>H. (5) Maintained</b> 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	<b>H. (5) Maintained</b>	<b>H. (5) Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
					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.	<b>June 14, 2018</b> and ongoing	<b>I. Completed 3/29/2018</b> CWS reports not refusing to handle reports, including those which fall outside its geographical jurisdiction.	<b>I. Maintained</b>	<b>I. Maintained</b>	<b>I. Maintained</b>	<b>I. Maintained</b>	<b>I. Maintained</b>
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	<b>June 14, 2018</b> and ongoing	<b>I. (1) a.-b. Completed 3/29/2018</b> CWS transfers calls to appropriate agencies or sent reports by phone, fax, or electronic transmission to the appropriate agency.	<b>I. (1) a.-b. Maintained</b>	<b>I. (1) a.-b. Maintained</b>	<b>I. (1) a.-b. Maintained</b>	<b>I. (1) a.-b. Maintained</b>	<b>I. (1) a.-b. Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.							
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.	<b>June 14, 2018</b> and ongoing	<b>I. (2) a.-b. Completed 3/29/2018</b> CWS reports immediate transfer of out of jurisdiction reports and calling reporting agency to inform of actions.	<b>I. (2) a.-b. Maintained</b>	<b>I. (2) a.-b. Maintained</b>	<b>I. (2) a.-b. Maintained</b>	<b>I. (2) a.-b. Maintained</b>	<b>I. (2) a.-b. Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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 <a href="http://www.cclss.ca.gov/letters/notices/entres/getinfo/acl05/pclt/05-09.pdf">www.cclss.ca.gov/letters/notices/entres/getinfo/acl05/pclt/05-09.pdf</a>	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</b>	<b>J. (1) Completed 6/26/2018</b> CWS 09-09 Emergency Response. Title: 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 <a href="http://www.cdss.ca.gov/P">http://www.cdss.ca.gov/P</a>	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</b>	<b>J. (2) Completed 6/26/2018</b> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
<a href="#">ortals/9/ACL/2017/17-27.pdf</a>							
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.).	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</b>	<b>J. (3) Completed 6/26/18</b> CWS 09-09 Emergency Response. Title: Reports on Open Investigations or Cases was circulated to staff on 6/26/2018.					
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	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS.</b>	<b>K. Partially Completed</b> 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.	<b>K. Completed policy development</b>  <b>Implementation Incomplete</b> CWS 18-20 Investigations policy and procedures was distributed on 12/14/2018.  Steps are needed to verify adherence to policy.	<b>K. Implementation Incomplete</b>  Steps are needed to verify adherence to policy.  Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations.	<b>K. Implementation Incomplete</b>  Steps are needed to verify adherence to policy.  Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations.	<b>K. Implementation Incomplete</b>  Steps are needed to verify adherence to policy.  Tribes are not being routinely contacted as required to contribute to evaluations during intake and investigations.	<b>K. Implementation in Process</b>  As of January 2021, CWS reviewing Intake reports for contact with Tribes and steps to gather information from Tribal representatives. Gathering information from Tribes can help CWS inform the assessment of risk

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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 contacts, 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					CWS has committed to creating an ICWA program, including CQI measures, to address concerns and improve collaboration with Tribes.	CWS has begun meeting with Tribal representatives to create an ICWA program.	of harm to a child during intake. CWS has not taken steps to review intake records of children of other ethnicities.

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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 <a href="http://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acin/2014/I-52_14.pdf">http://www.cdss.ca.gov/lettersnotices/EntRes/getinfo/acin/2014/I-52_14.pdf</a>							
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.	<b>June 14, 2018, extended to June 25, 2018 by the Office of the Attorney General per written request made by CWS</b>	<b>L. Completed 6/26/2018</b> CWS circulated Mandated Reporter policy and procedures; informing mandated reporters of the status of a referral will also be addressed in the Investigations policy expected to be circulated by 12/14/2018.	<b>L. Completed</b> CWS 18-20 Investigations policy and procedures on 12/14/2018.	<b>L. Completed</b> CWS documented sending a response for 1,214 (97%) of the 1,252 reports received from a mandated reporter: 1,207 written and seven telephone or in-person). For the additional 38 reports there was no documentation of a response.	<b>L. Completed</b> CWS documented generating a response for 99% of reports received from a mandated reporter.	<b>L. Maintained</b> CWS documented generating a response for 100% of reports received from a mandated reporter.	<b>L. Maintained</b> CWS documented generating a response for 100% of (797) 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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	<b>M. Completed training and policy development, 6/26/2018</b> 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.	<b>M. Implementation Incomplete</b> There are no data on assessment of implementation.	<b>M. Implementation Incomplete</b> There are no data on assessment of implementation.	<b>M. Implementation Incomplete</b> 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.	<b>M. Implementation Incomplete</b> There are no data on assessment of implementation.  CWS holds Child and Family Team meetings at a rate significantly lower than expected by policy.  393 CFT meetings were held for 338 cases.	<b>M. Implementation Incomplete</b> There are no data on assessment of implementation.  CWS holds Child and Family Team meetings at a rate significantly lower than expected by policy.  295 CFT meeting were held for 259 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
<b>Tribal Collaboration</b>							
N. CWS shall revise its policies and procedures to ensure collaboration with and input relating to decision-making from tribes.	<b>June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.</b>	<b>N. Not Completed</b> 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.	<b>N. Completed Policy Development; Implementation Incomplete</b> CWS completed the process of gaining input on policies from Tribes on 11/30/2018. Efforts are needed to ensure expected practices.	<b>N. Implementation Incomplete</b> 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</i>	<b>N. Implementation Incomplete</b> 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>	<b>N. Implementation Incomplete</b> Efforts are needed to ensure expected practices.  CWS supervisors are reviewing referrals for expected practices.  CWS and CSSP continue to receive valid complaints about CWS failures to implement policies with Tribes during intake, investigations, and in-home cases.	<b>N. Implementation In Process</b> In January 2021, CWS began an assessment of intake practices to learn about and improve collaboration with Tribes at intake.  CWS plans to review documentation of investigations records on a quarterly basis to understand and improve collaboration with Tribes during investigations.

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
				<i>Consultant to negotiate Tribal protocols/MOUs.</i>	<i>See Recommendation 13: Continue to work actively with the Tribal Consultant to 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.	<b>June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.</b>	<b>N. (1) Not Completed</b> Intake policy and procedures to be updated with Tribal input by 10/12/2018.	<b>N. (1) Completed Policy Development; Implementation Incomplete</b> CWS updated Intake policy and procedures with Tribal input. 10/12/2018. Efforts are needed to ensure expected practices.	<b>N. (1) Implementation Incomplete</b> 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</i>	<b>N. (1) Implementation Incomplete</b>	<b>N. (1) Implementation Incomplete</b>	<b>N. (1) Implementation In Process</b> In January 2021, CWS began an assessment of intake practices to learn about and improve required practices with Tribes at intake.

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
				<p><i>announced and promised.</i></p> <p><i>See Recommendation 13: Continue to work actively with the Tribal Consultant to negotiate Tribal protocols/MOUs.</i></p>			
N. (1) a. The screener shall document details of that contact in the screener narrative, including whether contact was made, input was sought, and the input from the tribe, if any, including the dates and times of such contact.	<b>June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per request made by CWS.</b>	<b>N. (1) a. Not Completed</b> Intake policy and procedures to be updated with Tribal input by 10/12/2018.	<b>N. (1) a. Completed Policy Development; Implementation Incomplete</b> CWS updated Intake policy and procedures with Tribal input on 10/12/2018. Efforts are needed to ensure expected practices.	<b>N. (1) a. Implementation Incomplete</b> Efforts are needed to ensure expected practices.	<b>N. (1) a. Implementation Incomplete</b> Efforts are needed to ensure consistency in expected practices.	<b>N. (1) a. Implementation Incomplete</b> CWS reports that a supervisor reviews each referral or report to intake.  Efforts are needed to ensure consistency in expected practices.	<b>N. (1) a. Implementation In Process</b> In January 2021, CWS began an assessment of intake practices to learn about and improve required practices with Tribes at intake.
N. (2) For the referrals that are assigned for investigation, CWS shall provide Tribal representatives sufficient notice to allow such representatives to	<b>June 14, 2018, extended to August 24, 2018 by the Office of the Attorney General per</b>	<b>N. (2) Not Completed</b> To be included in Investigation policy and procedures expected to be	<b>N. (2) Completed Policy Development; Implementation Incomplete</b> CWS updated Investigation	<b>N. (2) Implementation Incomplete</b> Efforts needed to ensure expected practices.	<b>N. (2) Implementation Incomplete</b> Efforts needed to ensure consistency in expected practices.	<b>N. (2) Implementation Incomplete</b> Efforts needed to ensure consistency in expected practices.	<b>N. (2) Implementation In Process</b> In January 2021, CWS began an assessment of intake practices to

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
accompany CWS social workers to investigations to ensure that such representatives are included in decision-making relating to those referrals.	<b>request made by CWS.</b>	finalized by 12/31/2018.	policy and procedures with Tribal input. Efforts needed to ensure expected practices.				learn about and improve required practices with Tribes at intake.
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.	<b>April 14, 2018</b> Ongoing	<b>O. Completed 4/5/18</b> 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.	<b>O. Maintained</b>	<b>O. Maintained</b>	<b>O. Maintained</b>	<b>O. Maintained</b>	<b>O. Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.	<b>November 14, 2018</b>	<b>P. In Process</b> Tribal Consultant Olin Jones has met regularly with CWS and Tribal representatives to identify priorities and begin to draft protocols.	<b>P. In Process</b> 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.	<b>P. In Process</b> 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>	<b>P. In Process</b> 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 reliability of a future protocol or MOU.	<b>P. In Process</b> 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 reliability of a future protocol or MOU.	<b>P. In Process</b> CWS reports that the CA DSS' Director of Tribal Affairs is assisting the County in the development of MOUs.
<b>Revision of Policies and Procedures by Defendant Sheriff's Office</b>							
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	<b>March 15, 2018</b>	<b>Q. Completed 3/14/2018</b> The Sheriff's Office updated policies and procedures to reflect					

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
procedures and circulate to all personnel.		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	<b>R. Completed 3/14/2018</b> Expectations were issued to staff in child abuse and child and adult dependent safety policies on: 1. Confidentiality requirements set forth under Penal Code section 11167, and 2. Implementing regulations set forth in California Code of Regulations, Title II, division 1, chapter 9 (11 C.C.R. §900 et seq.), including regulations relating to investigations of suspected child abuse in out-of-home care facilities.	<b>R. Maintained</b> CSSP interviewed three staff hired or promoted during MP1. They each had a thorough grasp of policies and expectations.	<b>R. Maintained</b> Efforts are needed to ensure expected practices.	<b>R. Maintained</b> Efforts are needed to ensure expected practices.	<b>R. Maintained</b> Efforts are needed to ensure expected practices.	<b>R. Maintained</b> Efforts are needed to ensure expected practices

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
S. The Sheriff's Office shall ensure timely cross-reporting to CWS and DA's office.	<b>March 15, 2018</b> and ongoing	<b>S. Completed 3/14/2018</b> 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.	<b>S. Maintained</b> HCSO continues to report a weekly review process to ensure timely cross reporting.	<b>S. Maintained</b> HCSO continues to report a weekly review process to ensure timely cross reporting.	<b>S. Maintained</b> HCSO continues to report a weekly review process to ensure timely cross reporting.	<b>S. Maintained</b> HCSO continues to report a review process to ensure timely cross reporting and plans to include data reconciliation to the agenda for monthly meetings with the CWS CANRA Coordinator.	<b>S. Maintained</b> HCSO continues to report a review process to ensure timely cross reporting and plans to include data reconciliation to the agenda for monthly meetings with the CWS CANRA Coordinator.
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.	<b>March 15, 2018</b> and ongoing	<b>T. Completed 3/14/18</b> Expectations were issued to staff in Child Abuse policy: upon receipt of report, cross report by telephone and in writing.	<b>T. Maintained</b>	<b>T. Maintained</b>	<b>T. Maintained</b>	<b>T. Maintained</b>	<b>T. Maintained</b>
U. The Sheriff's Office shall make cross-reports to the DA's office in accordance with Penal Code section 11166, subdivision (k).	<b>March 15, 2018</b> and ongoing	<b>U. Completed 3/14/18</b> Expectations were issued to staff in Child Abuse policy.	<b>U. Maintained</b>	<b>U. Maintained</b>	<b>U. Maintained</b>	<b>U. Maintained</b>	<b>U. Maintained</b>



<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.	<b>March 15, 2018</b> and ongoing	<b>V. Completed 3/14/2018</b> HCSO reports to CWS as soon as aware of child abuse/neglect situation and follow-up in writing.	<b>V. Maintained</b>	<b>V. Maintained</b>	<b>V. Maintained</b>	<b>V. Maintained</b>	<b>V. Maintained</b>
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.	<b>March 15, 2018</b>	<b>W. Completed</b> 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	<b>March 15, 2018</b> and ongoing	<b>X. Completed 3/14/2018</b> HCSO ensures that cross reports are	<b>X. Maintained</b> CSSP has reviewed HCSO data which	<b>X. Maintained</b> CSSP has reviewed HCSO data which	<b>X. Maintained</b>	<b>X. Maintained</b>	<b>X. Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.”		assigned for service.	reflect these practices.	reflect these practices.			
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.	<b>March 15, 2018</b> and ongoing	<b>X. (1) Completed 3/14/2018</b> HCSO reports a weekly review of cross reports.	<b>X. (1) Maintained</b> CSSP has reviewed HCSO data which reflect these practices.	<b>X. (1) Maintained</b> CSSP has reviewed HCSO data which reflect these practices.	<b>X. (1) Maintained</b>	<b>X. (1) Maintained</b>	<b>X. (1) Maintained</b>
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	<b>March 15, 2018</b> and ongoing	<b>X. (2) Completed 3/14/2018</b> HCSO and CWS CANRA Coordinators track referrals and cross reports to ensure joint work.	<b>X. (2) Maintained</b> Expectations for these practices continue.  Efforts are needed to understand coordination across agencies.	<b>X. (2) Maintained</b> Expectations for these practices continue.  CSSP will collect data and report on joint response practice in the subsequent report.	<b>X. (2) Maintained</b> Expectations for these practices continue.  A CSSP review of CWS reports to HCSO in January 2020, found that deputies are	<b>X. (2) Maintained</b>	<b>X. (2) Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.					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.	<b>March 15, 2018</b> and ongoing	<b>Y. Completed 3/15/2018</b> HCSO reports not refusing to handle reports, even those which fall outside its geographical jurisdiction.	<b>Y. Maintained</b>	<b>Y. Maintained</b>	<b>Y. Maintained</b>	<b>Y. Maintained</b>	<b>Y. Maintained</b>
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	<b>March 15, 2018</b> and ongoing	<b>Y. (1) a. Completed 3/15/2018</b> HCSO reports transferring calls to appropriate agency.	<b>Y. (1) a. Maintained</b>	<b>Y. (1) a. Maintained</b>	<b>Y. (1) a. Maintained</b>	<b>Y. (1) a. Maintained</b>	<b>Y. (1) a. Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.	<b>March 15, 2018</b> and ongoing	<b>Y. (1) b. Completed 3/15/2018</b> If HCSO cannot transfer, reports are sent to the appropriate agency.	<b>Y. (1) b. Maintained</b>	<b>Y. (1) b. Maintained</b>	<b>Y. (1) b. Maintained</b>	<b>Y. (1) b. Maintained</b>	<b>Y. (1) b. Maintained</b>
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	<b>March 15, 2018</b> and ongoing	<b>Y. (2) a. Completed 3/15/2018</b> HCSO handles cross-reports from CWS that are outside jurisdiction by transferring to appropriate agency and following-up with call to appropriate agency.	<b>Y. (2) a. Maintained</b>	<b>Y. (2) a. Maintained</b>	<b>Y. (2) a. Maintained</b>	<b>Y. (2) a. Maintained</b>	<b>Y. (2) a. Maintained</b>

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.		<b>Y. (2) b. Completed 3/15/2018</b> Handling of cross-reports from CWS outside jurisdiction, after transferring to appropriate agency, follow-up with call to appropriate agency and notify CWS.	<b>Y. (2) b. Maintained</b>	<b>Y. (2) b. Maintained</b>	<b>Y. (2) b. Maintained</b>	<b>Y. (2) b. Maintained</b>	<b>Y. (2) b. Maintained</b>
<b>Electronic Records and Tracking</b>							
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.	<b>March 30, 2018</b> and ongoing	<b>Z. Completed 3/25/2018</b> CWS - Creation of internal system for cross-reports.	<b>Z. Maintained</b>	<b>Z. Maintained</b>	<b>Z. Maintained</b>	<b>Z. Maintained</b>	<b>Z. Maintained</b>
AA. Within 45 days of the entry of Judgment,	<b>March 30, 2018</b> and ongoing	<b>AA. Completed</b> Sheriff's Office created an internal	<b>AA. Maintained</b> HCSO continues to maintain an	<b>AA. Maintained</b> HCSO continues to maintain an	<b>AA. Maintained</b> HCSO continues to maintain an	<b>AA. Maintained</b>	<b>AA. Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.		system for tracking cross-reports.	electronic system of reports and cross reports received and made and subsequent actions taken.	electronic system of reports and cross reports received and made and subsequent actions taken.	electronic system of reports and cross reports received and made and subsequent actions taken.		
AA. (1) The Sheriff's Office shall retain and categorize reports in its Records Management System ("RMS"). Any supplemental information received from CWS and other agencies or persons relating to a report, including follow-up reports, documentation, or cross-reports, shall be electronically included in the case file in RMS. The case file shall include detailed information about the method and dates of making and receiving cross-reports, as well as	<b>March 30, 2018</b> and ongoing	<b>AA. (1) Completed</b> Retain, categorize, and update reports in RMS.	<b>AA. (1) Maintained</b>	<b>AA. (1) Maintained</b>	<b>AA. (1) Maintained</b>	<b>AA. (1) Maintained</b>	<b>AA. (1) Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
information about the investigator's response by each agency.							
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) <b>Completed</b> HCSO tracks reports which fall outside jurisdiction.	AA. (2) <b>Maintained</b> 24 reports received, tracked, and forwarded to the appropriate agency during reporting period.	AA. (2) <b>Maintained</b> 19 reports received, tracked, and forwarded to the appropriate agency.	AA. (2) <b>Maintained</b> 22 reports received, tracked, and forwarded to the appropriate agency.	AA. (2) <b>Maintained</b> 40 reports received, tracked, and forwarded to the appropriate agency.	AA. (2) <b>Maintained</b> 46 reports received, tracked, and forwarded to the appropriate agency.
<b>Contract between Defendant CWS and NCCD</b>							
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	<b>June 30, 2019</b> and ongoing	BB. (1) a.-d. <b>Completed</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (1) a.-d. <b>Completed</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	BB. (1) a.-d. <b>Completed</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.  <i>See Recommendation</i>	BB. (1) a.-d. <b>Completed</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.  CWS has implemented	BB. (1) a.-d. <b>Completed</b> NCCD/Evident Change and CWS have monthly calls focus on SDM <sup>®</sup> tools and practices to assess safety and risk. <sup>88</sup>	

<sup>88</sup> National Center for Crime and Delinquency is now known as Evident Change: [www.evidentchange.org](http://www.evidentchange.org)

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.				<i><b>2: Implement quality assurance activities at intake to support supervisors in reviewing each report to the hotline.</b></i>  <i><b>See Recommendation 6: Require supervisors to conduct monthly reviews of at least one case per social worker per month.</b></i>	supervisory coaching at intake and, as of February 2020, supervisors conduct 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	<b>June 30, 2019</b> and ongoing	<b>BB. (2) a.-d. Completed</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	<b>BB. (2) a.-d. Maintained</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	<b>BB. (2) a.-d. Maintained</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	<b>BB. (2) a.-d. Maintained</b> NCCD continues to provide training, technical assistance, and coaching to CWS staff and management.	<b>BB. (2) a.-d. Maintained</b> Evident Change continues to provide leadership coaching.  CWS has contracted with Evident Change to extend the coaching model to all staff beginning in January 2021.	<b>BB. (2) a.-d. Maintained</b> Evident Change continues to provide leadership coaching.  CWS contracted with Evident Change to extend the coaching model to all staff.



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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.							
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. (1) Assistance with revision of policies and procedures.	<b>March 15, 2018</b> and ongoing	<b>CC. (1) – (7) Completed contract 2/27/18</b> CWS amended its contract with NCCD to provide for additional services and amended the term of the contract from a two-year to three-year period. CWS provided the Attorney General's Office with a copy of CWS' amended executed contract with NCCD.	<b>CC. (1) – (7) In process: (2), (3), and (7)</b> NCCD completed work on mapping decision making post investigation, provided coaching in SDM <sup>®</sup> implementation and introduced the workload study to leadership, who asked for a delay in implementation, given other work underway. Work on the mandated	<b>CC. (1) – (7) In process: (2), (3), and (7)</b> NCCD provided coaching in SDM <sup>®</sup> implementation and safety organized practice and began to plan for the workload study.  CWS must work on managing by data, implementing CQI structures, and integrating Tribal needs into system improvement.	<b>CC. (1) – (7) In process: (2), (3), and (7)</b> NCCD provided coaching in SDM <sup>®</sup> implementation and safety organized practice and began the workload study.  CWS took steps to increase managing by data and implementing CQI structures.	<b>CC. (1) – (7) In process: (3), (4), and (7)</b> (3) The Workload Study moved to data collection phase in mid-March 2020 but was discontinued due to the pandemic.  (4) Evident Change met with analysts to develop qualitative data collections skills.	<b>CC. (1) – (7) In process:</b> 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.

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
<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</p>			reporter guide is in underway.	<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 adherence to policy mandates in all practices.</i></p> <p><i>See Recommendation 14: Implement multiple measures to understand the impact of and</i></p>		<p>(5) Business process mapping TA is available to CWS but has not been used during this time.</p> <p>(6) CWS and Evident Change did not engage in work directly related to Tribes during this time.</p> <p>(7) Work towards CPRG development continued, including testing and a soft launch.</p>	<p>(4) Manage by data assistance, including bolstering continuous quality improvement processes and skills, including analytic support to improve agency practices.</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 development of a Mandated Reporter</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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
of a case and what happens at each decision point in order to identify roadblocks, inefficiencies, and needs to enable fidelity to best practice. (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. (7) Assistance with the development of a Mandated Reporter Guide, as detailed in Section KK (I).				<i>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>  <i>See Recommendation 15: Create an agency wide CQI program.</i>			Guide/Child Protection Reporting Guide.
CC. (8) Creation and implementation of plans to address outstanding, backlogged investigations to ensure that all referrals are investigated.	<b>March 15, 2018</b> and ongoing, as needed	<b>CC. (8) Completed</b> With TA from NCCD, CWS implemented plans to complete backlogged investigations.	<b>CC. (8) Maintained</b> With TA from NCCD, CWS implemented plans to complete backlogged investigations.	<b>CC. (8) Maintained</b> CWS implemented a plan to complete backlogged investigations.	<b>CC. (8) Maintained</b>	<b>CC. (8) Maintained</b>	<b>CC. (8) Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 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	<b>April 28, 2018</b> and ongoing, as needed	<b>CC. (8) a. Completed</b> CWS implemented plans to complete backlogged investigations.					

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
the amendment of the contract.							
CC. (8) b. CWS shall work with NCCD to create a time management plan that ensures new investigations are completed in a timely manner as CWS is addressing backlogged investigations. This may include revisions to policies and procedures, training to better utilize SafeMeasures®, or other strategies. The time management plan shall be completed and action initiated within 60 days of the amendment of the contract.	<b>April 28, 2018</b> and ongoing, as needed	<b>CC. (8) b. Completed</b> CWS implemented plans to complete outstanding investigations.	<b>CC. (8) b. Maintained</b>				
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.	<b>February 13, 2019</b>	<b>CC. (8) c. In Process</b> CWS has exceeded the goal of closing 30% of backlogged investigations each quarter, reducing the backlog from 293 in February	<b>CC. (8) c. Completed, 2/12/2019</b> CWS eliminated the backlog of 293 investigations as of February 12, 2019.	<b>CC. (8) c. Completed</b> <i>See Recommendation 8: Create a plan on how to sustain the progress on the backlog reduction and to determine investigations that</i>	<b>CC. (8) c. Completed To</b> conduct timely investigations, CWS pairs social workers for investigations and makes geographical assignment of		

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
		2018 to 60 on August 13, 2018.		<i>legitimately reflect a need to maintain an open file.</i>	investigations. Social workers may also receive assistance from clerical staff to enter notes in CWS/CMS.		
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.	<b>February 13, 2019</b>	<b>CC. (8) d. Not Completed</b> The backlog of investigations was 168 on September 12, 2018.	<b>CC. (8) d. Not Completed</b> The backlog of investigations was 191 on February 28, 2019.	<b>CC. (8) d. Not Completed</b> The backlog of investigations was 62 on August 31, 2019.	<b>CC. (8) d. Completed</b> The backlog of investigations was 7 on February 29, 2020.		
<b>Training</b>							
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	<b>August 12, 2018</b>	<b>EE. (1) Completed August 9, 2018</b>					

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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;							
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	<b>August 12, 2018</b>	<b>EE. (2) Completed August 9, 2018</b>					
EE. (3) The revised policies and procedures that CWS is required to implement pursuant to the Judgment.	<b>August 12, 2018</b>	<b>EE. (3) Not Completed</b> CWS has not finalized policies with input from Tribes and the Community Task Force. CWS has not circulated Investigations policy to staff.	<b>EE. (3) Completed December 14, 2018</b> CWS circulated policies that incorporated Tribal input.				

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.	<b>Monthly from August 13, 2018</b>	<b>EE. (4) Completed</b> The AG advised CWS to submit training provided 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.	<b>Annually, August, and ongoing (for new hires)</b>	<b>EE. (5) Partially Completed</b> CWS provided training on WIC, CANRA, accepting reports, and cross reporting.  Policies and procedures, and therefore related training, have not yet been finalized.	<b>EE. (5) Completed</b> 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.	<b>EE. (5) Completed</b> New and ongoing staff have participated in sessions on CANRA, WIC, and policies.	<b>EE. (5) Completed</b> New and ongoing staff have participated in sessions on CANRA, WIC, and policies.	<b>EE. (5) Completed</b>	<b>EE. (5) Completed</b>
FF. Defendant Sheriff's Office shall provide annual mandatory training for its deputies and	<b>Annually, August</b>	<b>FF. (1)-(4) Completed March 2018</b>	<b>FF. (1)-(4) Maintained</b>	<b>FF. (1)-(4) Not Completed</b> HCSO reports providing annual	<b>FF. (1)-(4) Completed/ Maintained</b>	<b>FF. (1)-(4) Not completed</b> HCSO did not provide annual	<b>FF. (1)-(4) Completed/ Maintained</b>



<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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 (4) Trauma-informed practices relating to interviews of children.				training to all but 20 staff by August 31, 2019. <sup>89</sup>	All staff up to date on training. No additional requirements during this period.	training to staff as of August 2020 as required, due to the pandemic. Training is on track to be completed by early December 2020.	All staff up to date on training.
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	<b>Ongoing</b>	<b>FF. (5) Completed</b>	<b>FF. (5) Maintained</b>	<b>FF. (5) Maintained</b>	<b>FF. (5) Maintained</b>	<b>FF. (5) Maintained</b>	<b>FF. (5) Maintained</b>

<sup>89</sup> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
personnel hires shall be required to attend such training within 30 days of hire.							
<b>Complaint Systems</b>							
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.	<b>April 15, 2018</b> and ongoing	<b>GG. Completed April 13, 2018</b> CWS opened an Office of the Ombudsperson with an assigned supervisor “to provide independent review of questions and concerns related to CWS practices.” <sup>90</sup>	<b>GG. Ongoing</b> CWS continues to operate the Office of the Ombudsperson which received 63 complaints this period.	<b>GG. Ongoing</b> CWS continues to operate the Office of the Ombudsperson which received 110 complaints this period.	<b>GG. Ongoing</b> CWS continues to operate the Office of the Ombudsperson which received 84 complaints this period.	<b>GG. Ongoing</b> CWS continues to operate the Office of the Ombudsperson which received 58 complaints this period.  CWS reports meeting with DHHS to discuss recommendations to DHHS’ review of the Office and making improvements in the operations and reporting structure of the Office to improve effectiveness.	<b>GG. Ongoing</b> CWS continues to operate the Office of the Ombudsperson which received 71 complaints this period.  CWS is in varied stages of implementing DHHS recommendations and other efforts to improve the functioning of the Office.

<sup>90</sup> <https://humboldt.gov.org/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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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 and track policy procedural complaints related to CANRA.	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 neglect investigations.	HH. Maintained HCSO reports receiving no complaints or inquiries related to child abuse and neglect investigations.	HH. Maintained HCSO reports receiving three complaints or inquiries related to child abuse and neglect investigations.	HH. Maintained HCSO reports receiving no complaints or inquiries related to child abuse and neglect investigations.
<b>Community Task Force ("Task Force")</b>							
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	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	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.	II. Maintained	II. 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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.		then during this monitoring period.					
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.	<b>June 14, 2018</b> and ongoing	<b>JJ. Completed 5/24/2018 – 8/31/2018</b> Community Task Force meetings were held 5/24/2018, 6/21/2018, and 7/26/2018.	<b>JJ. Maintained</b> Community Task Force meetings were held 9/13/2018 and 1/24/2019.	<b>JJ. Maintained</b> Community Task Force meetings were held 3/28/2019, 5/23/2019, and 8/15/2019.  <b>See Recommendation 17: Share the results of DHHS'</b>	<b>JJ. Maintained</b> Community Task Force meetings were held 11/14/2019 and 2/14/2020.	<b>JJ. Maintained</b> Community Task Force meetings were held in May, June, and August 2020.	<b>JJ. Maintained</b> Community Task Force meetings were held in November 2020 and February 2021.

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
				<i>review of the 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 &amp; 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 &amp; 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>	June 14, 2018 and ongoing	<p><b>KK. (1) a.-d. In Process</b></p> <p>Sub-committee formed to create the Mandated Reporter Guide with support from NCCD.</p>	<p><b>KK. (1) a.-d. In Process, primarily c.</b></p> <p>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><b>KK. (1) a.-d. In Process, Primarily, c.</b></p> <p>The subcommittee to develop a web-based Mandated Reporter Guide continues to meet.</p>	<b>KK. (1) a.-d. In Process.</b>	<b>KK. (1) a.-d. In Process.</b>	<p><b>KK. (1) a.-d. In Process.</b></p> <p>The Humboldt County Child Protection Reporting Guide is in testing phase.</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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
d. A hard-copy version of the guide shall be made available.							
KK. (2) Input on changes or revisions to policies and procedures relating to CANRA.	June 14, 2018 and ongoing	KK. (2) In Process Sub-committee formed to review and provide input.	KK. (2) Completed A sub-committee reviewed CWS policies and procedures and provided input.	KK. (2). N/A No revised policies related to CANRA presented to the Task Force.	KK. (2). N/A No revised policies related to CANRA presented to the Task Force.	KK. (2). Topics for discussion raised for placement on future agenda.	KK. (2). N/A No revised policies related to CANRA presented to the Task Force.
KK. (3) Discussion of barriers encountered by the community and agencies with respect to CANRA and recommendations to address such barriers.	June 14, 2018 and ongoing	KK. (3) In Process Addressed through the Community Task Force and sub-committees.	KK. (3) In Process Addressed through the Community Task Force and sub-committees.	KK. (3) In Process Addressed through the Community Task Force  <i>See Recommendation 15. of this report: Create an agency-wide CQI program.</i>	KK. (3) In Process	KK. (3) In Process	KK. (3) In Process
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.	KK. (4) In Process To be included with Child Protection Reporting Guide.	KK. (4) In Process To be included with Child Protection Reporting Guide.

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.	<b>December 2019</b> and ongoing	<b>LL. Completed 8/7/2018</b> The Task Force has produced a schedule with timeframes for completion of a web-based mandated reporter guide, providing input on changes or revisions to policies and procedures relating to CANRA, discussing barriers encountered by the community and agencies with respect to CANRA and recommendations to address such barriers. The Task Force has not yet begun to identify available community-based resources within Humboldt County and processes to coordinate referrals to such resources.	<b>LL. Maintained</b>	<b>LL. Maintained</b>	<b>LL. Maintained</b>	<b>LL. Maintained</b>	<b>LL. Maintained</b>

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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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. <sup>91</sup>	MM. Maintained Minutes and documents have been sent to the monitor within the 35-day timeframe for 2 of the 3 meetings. Community Task Force meeting minutes and documents can be found on the Community Task Force website. <sup>92</sup>	MM. Maintained Minutes and documents have been sent to the monitor within the 35-day timeframe. Community Task Force meeting minutes and documents can be found on the Community Task Force website. <sup>93</sup>	MM. Maintained Minutes and documents have been sent to the monitor. Community Task Force meeting minutes and documents can be found on the Community Task Force website. <sup>94</sup>	MM. Maintained Minutes and documents have been sent to the monitor. Community Task Force meeting minutes and documents can be found on the Community Task Force website. <sup>95</sup>	MM. Maintained Minutes and documents have been sent to the monitor. Community Task Force meeting minutes and documents can be found on the Community Task Force website. <sup>96</sup>
<b>Compliance Monitor</b>							
4. This Judgment shall be overseen by a qualified third-party compliance monitor who shall be provided access to information and	March 1, 2018 and ongoing	4. Completed All Parties met and conferred regarding the identity of the monitor and Defendants gave	4. Maintained	4. Maintained	4. Maintained	4. Maintained	4. Maintained

<sup>91</sup> <https://humboldt.gov.org/2373/Community-Task-Force>

<sup>92</sup> Ibid

<sup>93</sup> Ibid

<sup>94</sup> Ibid

<sup>95</sup> Ibid

<sup>96</sup> 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	3/1/2020-8/31/2020 Performance	9/1/2020-2/13/2021 Performance
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		primary consideration to the Attorney General's Office's pre-approved monitor, the Center for the Study of Social Policy (CSSP).					

<b>Required Corrective Actions</b>	<b>Final Target</b>	<b>2/14/2018-8/31/2018 Performance</b>	<b>9/1/2018-2/28/2019 Performance</b>	<b>3/1/2019-8/31/2019 Performance</b>	<b>9/1/2019-2/29/2020 Performance</b>	<b>3/1/2020-8/31/2020 Performance</b>	<b>9/1/2020-2/13/2021 Performance</b>
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.							

## **Appendices**

### **Appendix A: Glossary of Acronyms**

AG – Attorney General

CANRA – Child Abuse and Neglect Reporting Act

CAST – Child Abuse Services Team

CDSS – California Department of Social Services

C-CFSR – California Child and Family Services Review

CFT – Child and Family Team

CMH – (Humboldt County Department of Health and Human Services’) Children’s Mental Health

CPRG – Child Protection Reporting Guide

CQI – Continuous Quality Improvement

CSSP – Center for the Study of Social Policy

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

HCSO – Humboldt County Sheriff’s Office

ICWA – Indian Child Welfare Act

KPI – Key Performance Indicator

MOU – Memorandum of Understanding

NCCD – National Council on Crime and Delinquency/Evident Change, now Evident Change

RMS – HCSO Records Management and Computer Aided Dispatch System

SDM<sup>®</sup> – Structured Decision Making

SIP – Systems Improvement Plan

TA – Technical Assistance