

## **Digest of A Review of the Bureau of Services Review**

We have completed our audit of the Bureau of Services Review (BSR) as required by **Utah Code 62A-4a-118**. We continue to emphasize that evaluating child welfare cases for procedural compliance should be part of a broader review of system performance and outcomes for children and families. In 1995 we recommended that BSR expand its procedural review and assess how well the Division of Child and Family Services (DCFS) was accomplishing its mission of protecting children. BSR implemented that recommendation the following year, but then reverted to only measuring compliance for the 1997 and 1998 monitoring periods. Because measuring for compliance alone provides limited information, we now reiterate the need for a broad review system that directly assesses performance and outcomes.

BSR has responded to both legislative and court oversight requirements since our 1994 audit of DCFS and the David C. et al. v. Leavitt lawsuit settlement agreement of the same year. After our audit, the 1994 Legislature directed the executive director of the Department of Human Services to annually report whether DCFS is adhering to “state statutes, division policy, and legislative policy” in conducting child welfare case work. The executive director has used BSR both to fulfill that legislative requirement and to monitor DCFS’s compliance with court-enforced requirements. Between 1994 and 1998, BSR primarily tested DCFS’s compliance with the court-monitored settlement agreement because of the threat of receivership, by the court, if compliance with the terms of the agreement was not sufficient.

Our report focuses on whether BSR meets legislative, as opposed to court, defined objectives. We conducted our review of the latest published BSR report (1998) which only measured procedural compliance. The main findings and recommendations of our audit are summarized in the following two areas:

**More Comprehensive Monitoring Is Needed.** BSR needs to adopt a more comprehensive monitoring program that more directly evaluates whether DCFS is achieving desired outcomes for children and families. One weakness of BSR’s 1998 review was its focus on detailed process compliance based solely on paper files. Broader reviews can provide state policymakers more useful information on the effectiveness of the child welfare system, rather than just on compliance with detailed requirements. We feel an improved review of the Child Protective Services (CPS) intake process is especially needed because some cases have received perfect compliance scores even though they were incorrectly rejected. BSR officials are aware of the shortcomings of a review that measures compliance only and have told us that they are changing to a more comprehensive, and hopefully effective, review process. BSR reports it has been unable to move beyond compliance monitoring until recently because of the demands of the settlement agreement. We make three

recommendations in this area:

- C BSR should include an overall assessment of the quality of work done and decisions made on each case it reviews for compliance.
- C BSR should monitor the CPS intake process in future reviews. The BSR review should include a judgement of the appropriateness of the decision to accept or reject the referral and should also include an assessment of the investigation priority assigned to accepted referrals.
- C BSR should continue its development and implementation of a more comprehensive review process that better measures caseworker performance and outcomes.

**Compliance Review Process Can Be Strengthened.** The results of our review of BSR's compliance review process are basically consistent with our prior two audits, although the rate at which we disagreed with BSR scoring is somewhat higher. We disagreed with the scoring on 12% of the compliance items in our sample of BSR's 1998 case reviews. However, like our prior audits, most of our disagreements are not significant in terms of child safety or well-being. Scoring differences occur for many reasons including errors on the part of BSR readers, the inherent subjectivity of the case review process, and disagreements over BSR scoring policy. We believe that improvements to the compliance review process are possible in the following four areas:

- C BSR should focus on accuracy rather than on the number of cases reviewed to reduce reader errors and improve the quality of the case review process.
- C BSR should continue to refine and reduce the number of questions reviewed for compliance to the most significant aspects of case work.
- C BSR should refine its reader manual to clear up confusion as to how certain questions should be answered. Specifically, we feel that use of the "Not Applicable" scoring option should be limited to questions about requirements that do not apply to a case and are not expected to be performed by the caseworker.
- C BSR should continue to formalize the process of double-reading cases to reduce the number of reader errors and also to identify those questions that are answered most inconsistently so they can be refined.