

Report To

The Mississippi Legislature



A Review of the Office of Social Services of the Division of Family and Children's Services

July 21, 1992

PEER finds no compelling reason for the Office of Social Services (OSS) to change its current organization structure, an appropriate and viable regional social service delivery concept set forth in Sections 35-41, Chapter 500, *Laws of 1986*. However, OSS has not reached its fullest service potential because it has not developed a quality assurance system capable of identifying and addressing individual failures and needs that limit the office's effectiveness.

The Office of Social Services should develop or refine the following components of a comprehensive quality assurance system:

- valid employment standards;
- relevant initial training and continuing education for service workers;
- a routinely conducted, quality-based employee appraisal system;
- ongoing assessments of the adequacy and placement of staff resources and analysis of the service needs of its clients; and,
- a documentation system that provides management with timely and accurate exception reports for system correction.

PEER makes specific recommendations on how these components should be developed and implemented.

The PEER Committee

PEER: THE MISSISSIPPI LEGISLATURE'S OVERSIGHT AGENCY

The Mississippi Legislature created the Joint Legislative Committee on Performance Evaluation and Expenditure Review (PEER Committee) by statute in 1973. A standing joint committee, the PEER Committee is composed of five members of the House of Representatives appointed by the Speaker and five members of the Senate appointed by the Lieutenant Governor. Appointments are made for four-year terms with one Senator and one Representative appointed from each of the U. S. Congressional Districts. Committee officers are elected by the membership with officers alternating annually between the two houses. All Committee actions by statute require a majority vote of three Representatives and three Senators voting in the affirmative.

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The Committee assigns top priority to written requests from individual legislators and legislative committees. The Committee also considers PEER staff proposals and written requests from state officials and others.

**A Review of the Office of Social Services of the
Division of Family and Children's Services**

July 21, 1992

**The PEER Committee
Mississippi Legislature**

The Mississippi Legislature
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PEER Committee



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July 21, 1992

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MEMBERS OF THE MISSISSIPPI STATE LEGISLATURE

At its meeting of July 21, 1992, the PEER Committee authorized release of the report entitled **A Review of the Office of Social Services of the Division of Family and Children's Services.**

A handwritten signature in cursive script that reads "Bill Canon".

Senator Bill Canon, Chairman

**This report does not recommend increased
funding or additional staff.**

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A Review of the Office of Social Services of the Division of Family and Children's Services

July 21, 1992

Executive Summary

Introduction

The Department of Human Services was established in 1989 as part of the executive branch reorganization for consolidation of related social services. Within the department's Division of Family and Children's Services, the Office of Social Services (OSS) administers prevention, protection and placement programs for children and families.

Overview

Child abuse is a large, complex, and enduring problem that deserves government's attention. In calendar year 1991, 4,091 substantiated cases of child abuse were recorded in the state of Mississippi, with the number of reports rising by twenty-two percent over the past six years (1985-1991). Many social service professionals view the governmental response to child protection as inadequate. Although the general approach taken by the government is thought to be appropriate for saving children, protective services programs have been limited in their effect. This is not to say that progress has not been made in creating a system of support and protection or that the system is totally unresponsive and lacking merit.

For example, the current organization structure and assignment of responsibilities for the Division of Family and Children's Services is in keeping with the intent of Sections 35-41, Chapter 500, *Laws of 1986*, and the statute provides an appropriate and viable model for service delivery. PEER finds no compelling reason for the department to turn away from the organizational constructs contained in the 1986 legislation. However, the division is not without its weaknesses and PEER finds support for many of the complaints lodged against it.

The OSS is characterized by a complex work environment where overall success is highly dependent on the performance of individuals and where the consequences of individual failure tend to be very serious. Enormous diversity exists in how well the service and quality assurance system works within and among the division's various levels of

responsibility. For every example of poor performance on the part of a direct service worker, supervisor, or manager, PEER found an example of exemplary performance.

This diversity of performance is the most telling aspect of OSS operations, pointing to one of the most obvious deficiencies in the Office of Social Services' current operational structure. This deficiency is that the OSS's accountability system is not truly an integrated, self-correcting system capable of identifying and addressing individual failures and needs. As a result, the Office of Social Services has neither identified its weakest employees and systems, nor has it reached its fullest service potential. Poorly performing individuals and systems are allowed to reflect poorly on the majority of service systems and direct service workers that do not have significant problems with competency or performance.

Within the Office of Social Services, the following major elements of a comprehensive accountability system would help to control this condition. Currently, these components are either missing or are in need of refinement:

- valid employment standards;
- relevant initial training and continuing education requirements;
- a routinely conducted, quality-based employee appraisal system;
- an ongoing assessment of the adequacy and placement of staff resources; and,
- a recording and documentation system that provides management with timely and accurate exception reports for system correction.

As a consequence of the Office of Social Services' failure to place the needed emphasis on accountability, deficient conditions exist which require immediate action from departmental leaders. However, action must be preceded by purpose, taking care not to harm the programs or people that are producing desired results.

The best strategy for making needed changes at OSS as constructive as possible involves at least two components: identifying exemplary performers in the system, and involving them in making needed accountability refinements. The regional service concept has potential for information feedback which can be used in identifying the need for and form of change. PEER's recommendations serve as a beginning for the needed change and deserve careful consideration in light of OSS's need for an improved accountability structure.

Findings

Concerns About OSS's Regional Service Structure

Current organization structure and assignment of division responsibilities for the Division of Family and Children's Services is in keeping with the intent of Sections 35-41, Chapter 500, Laws of 1986. The PEER Committee finds no compelling reason for the department to turn away from the organizational constructs contained in the 1986 legislation.

Office of Social Services' failures to produce more responsive service delivery structures or to attain the benefits envisioned for the regionally based social service system have resulted from deficiencies in the current quality assurance system rather than failures of the regional social service concept.

Division Effectiveness

Employment Standards, Training, and Appraisal

The Office of Social Services has failed to reach its fullest service potential due to the absence of well-trained professionals at all levels and to failures in implementation of the quality assurance system which result in a loss of appropriate feedback to management.

The regional service structure of the Division of Family and Children's Services allows for an appropriate dispersion of program authority and responsibility and the flexible use of resources, but it requires well-trained professionals and a smoothly running quality assurance system to work properly.

PEER found that:

- The Office of Social Services does not require that applicants for the position of social worker have an education relevant to the duties and responsibilities of the position.
- The Office of Social Services has not provided adequate training to insure that social workers possess the skills and knowledge necessary to perform their job effectively.
- Recent steps taken by the Office of Social Services to improve training for social workers could correct many of OSS's training deficiencies.
- The Office of Social Services' area social work supervisors are inconsistent in conducting performance appraisals of social workers, thus compromising one important component of the quality assurance system.

Adequacy of Staff Resources

Twenty-six of the state's eighty-four service areas have turnover rates greater than 25%.

The Office of Social Services has not collected the information it needs to determine accurately how many social workers are needed to deliver the desired level of social services to all clients.

Management Information

Department of Human Services management has failed to bring the Mississippi Social Services Information System (MSSIS) to its fullest operating potential as a support resource for front-line case management or for division management.

Quality Assurance

PEER found problems with the Division of Family and Children's Services' assessment of timeliness, goals and objectives, service standards, case documentation, planning and management; workload management; and service records and documentation.

Although division policy defines critical time and contact requirements for documenting investigations and cases, the Division of Family and Children's Services is inconsistent in its compliance with these requirements, thus bringing into question social workers' timely response to children at risk.

The Division of Family and Children's Services has not developed an assessment mechanism for evaluating the achievement of either the long- or short-range objectives contained in the Comprehensive Annual Social Services Plan.

The Division of Family and Children's Services has not designed measurable statewide service standards to assess the quality of the services delivered to clients.

PEER reviewed Office of Social Services case files that lacked completeness and consistency, did not serve as an accurate reference of case history, and did not sufficiently document service delivery.

Heavy paperwork requirements reduce the amount of time available to social workers for social service delivery.

Care of Children in Custody of the State

OSS could improve in the areas of monitoring and reducing the number of children who stay in emergency shelters beyond the thirty-day policy limit and reducing the amount of time taken to license a foster care home. OSS should also hasten its development of a multi-level reimbursement system to encourage in-state psychiatric treatment providers to develop facilities so that more children can be treated inside the state.

The Office of Social Services held twenty percent of children placed in emergency shelters over the 30-day policy limit (104 of 522 over a six-month period). Of the 104 children staying in shelters beyond the 30-day period, social workers did not obtain proper approval to retain at least 16%.

The Office of Social Services averages 158 days to license foster homes across the state, compared to a statewide policy requiring that licensing be accomplished within ninety days.

OSS's lack of a multi-level payment schedule by type of service has discouraged the development of therapeutic and psychiatric treatment facilities in Mississippi. Due to insufficient treatment capacity in Mississippi, fifty-nine percent of children receiving psychiatric residential treatment in federal FY1991 were placed in out-of-state facilities, making the goal of returning children to their families more difficult to achieve.

Financial Management

In the area of financial management, PEER found that OSS could improve its effectiveness in issuing foster care board payments and child services payments in a more timely manner and improve documentation for child services payments.

OSS does not consistently issue foster care board payments to foster parents on a timely basis.

OSS is not consistently timely in the payment of vendors and foster parents for services for children in custody of the agency and sometimes makes payments without proper documentation.

In April 1992, Rankin County had not paid a backlog of child service bills totalling approximately \$3,900.

Recommendations

The following are abbreviated statements of recommendations the PEER Committee makes in reference to the Office of Social Services of the Division of Family and Children's Services. Page numbers refer to complete details of these recommendations, including suggested time frames for implementation, in the full text of the report.

Concerns About OSS's Regional Service Structure

(pages 14 through 15)

1. In the absence of compelling evidence to the contrary, the Department of Human Services should retain the regional service concept for the Office of Social Services and use it as intended as a basis for improving the state's social service system.

2. The Department of Human Services should make every effort to insure that a comprehensive accountability system is in place within the Office of Social Services and that it functions as an integrated, self-correcting system capable of identifying and addressing individual failures and needs. The proper elements of a comprehensive accountability system include at least the following basic components:

- valid employment standards;
- relevant initial training and continuing education requirements;
- a routinely conducted, quality-based employee appraisal system;
- an ongoing assessment of the adequacy and placement of staff resources; and,
- a recording and documentation system that provides management with timely and accurate exception reports for system correction.

Division Effectiveness

Employment Standards, Training, and Appraisal (pages 31 through 32)

1. The Executive Director of the Department of Human Services should request the assistance of the State Personnel Board in identifying and validating minimum employment standards for direct service workers similar to those being developed by the OSS Training Division for social workers.
2. The Office of Social Services Training Coordinator should develop minimum training and competency requirements to be incorporated into a formal social worker training program.
3. The Office of Social Services Training Coordinator should develop and implement a monitoring system to track individual employee training activities and goals.
4. All area social work supervisors should immediately begin to conduct and document performance appraisals as required by DHS administrative policy.

5. Working with the Office of Personnel and Staff Development, area directors and the Director of the Office of Social Services should propose any needed revisions to the current performance appraisal monitoring system.

Adequacy of Staff Resources (pages 45 through 46)

1. The Director of the Office of Social Services should work with the Training Coordinator to design and implement stress management training in order to reduce the stress and burnout that lead to high turnover rates.
2. The Executive Director should work closely with the State Personnel Officer to insure that communication between the agencies is clear and that direct service vacancies are appropriately filled in the shortest time possible. Both executives should designate one staff member each to monitor DHS personnel requests for timeliness over the next year.
3. The Director of the Office of Social Services should immediately appoint a task force, composed of the directors of OSS's Administration, Protection and Placement units and the six area directors, to study caseload standards and ratios. The task force's report should identify needed resources for improving OSS's service system and should provide a cost analysis, a timetable and funding priorities for implementation.
4. When changing definitions of categories of workload or other data, the Director of the Division of Family and Children's Services should require that the data be collected under the old and new definitions for one or more reporting periods to permit accurate conversion from one format to another.
5. If the Division of Family and Children's Services continues to use average time spent by social workers per case as a basis for allocating resources, the Director of the Administration Unit should immediately review current procedures for determining social workers' workloads and use of time to ensure that the two studies use comparable case type/activity definitions.
6. The Director of the Division of Family and Children's Services should immediately formulate and clearly communicate through the area directors the division's service priorities.

Management Information

(pages 48 through 50)

1. The Director of the Office of Social Services should immediately assign staff to review the reporting requirements of MISS, CODE ANN, Section 43-15-5 and develop a compliance plan to be implemented as soon as possible.
2. The Executive Director of DHS should immediately appoint a task force from the Division of Family and Children's Services and the Division of Management Information Systems to review and assess the management information needs of the Office of Social Services.

Quality Assurance

(pages 54 through 56)

1. The Management Information Systems task force should review the existing quality assurance system and develop a prioritized plan of action for addressing the automation and information needs of regional and area offices.
2. The Director of OSS and the Director of OSS's Administration Unit should determine the data collection and output needs of direct service staff and administration for tracking social workers' compliance with OSS monthly visitation requirements for all children in custody.
3. Starting immediately and until a complete data collection and feedback loop for visitation data is established, area directors should require area social work supervisors to report on the visitation of children in custody, including an analysis of the time spent in visitation per case and, where appropriate, an estimate of the additional time needed in visitation to meet service standards.
4. Assuming that federal funds can be found to hire the thirty-five social worker aide positions appropriated under Senate Bill 3117 (1992), area social work supervisors should utilize the aides to relieve social workers of some routine duties.
5. Area directors should meet with their respective area social work supervisors and social workers to identify opportunities for paperwork reduction and to assess the feasibility of

utilizing clerical staff to complete any paperwork not requiring professional knowledge, skills and abilities. The Director of the Office of Social Services should also submit a cost-benefit plan for clerical assistance to the Executive Director of the Department of Human Services for inclusion in DHS's FY 1995 budget request and for consideration in reallocating existing clerical resources of the Department of Human Services.

6. The Director of the Office of Social Services should require area directors to conduct annual community needs assessments and to report the results to OSS in January of each year.
7. The Director of the Office of Social Services should require area directors to meet with area social work supervisors in their respective regions to devise formal social worker service standards and procedures to measure the quality of services delivered to clients, including quality assurance elements to be used in case planning and service documentation, as well as the timeliness of these services.

Care of Children in Custody of the State

(pages 61 through 62)

1. The Director of the Office of Social Services should enforce OSS's policy of requiring social workers to obtain permission to hold children in emergency shelters over thirty days. Working in conjunction with the area directors, the Director of the Placement Unit should submit formal approval standards for extension of stays to the Director of OSS for approval and implementation.
2. The Director of OSS's Placement Unit should place priority on completing and implementing the levels-of-care reimbursement system for therapeutic and psychiatric residential treatment to be submitted for approval to the Executive Director.
3. OSS's Placement Unit Director and staff should study the needs of and facilities for emotionally disturbed children. OSS should update this analysis semiannually to monitor the effect of the levels of care reimbursement system on the availability of treatment facilities in the state and to track the division's progress in meeting the needs of children.

Financial Management
(pages 68 through 70)

1. The OSS Director of Administration should begin monitoring monthly to determine how the new program of processing federal funding eligibility paperwork at the state office level affects the timeliness of payments to foster parents and revise procedures as necessary to improve timeliness of payments.
2. In counties where the old system of locally determining IV-E eligibility is still operating, area directors should monitor county social workers' timeliness in submitting the completed 190F eligibility determination forms to the Client Payroll Unit. In regions where the new state-level system of determining IV-E eligibility is operating, area directors should insure that county workers submit necessary information to the state office as soon as possible so that the state office can complete 190F forms by the third of each month.
3. Area supervisors should appoint one staff person in each county office or be responsible themselves for insuring that all 190F forms are sent to the appropriate location in a timely manner.
4. The Director of the DHS Division of Management Information Systems, the Director of Accounting and Finance, the OSS Director of Administration, and the supervisor of the Client Payroll Unit should perform a cost-benefit analysis in selecting the most effective and efficient online system to allow client payroll workers to edit foster board payroll information directly in order to reduce rate payments to foster parents.
5. All area directors should immediately begin to conduct a quarterly review of county bookkeeping systems to insure that social workers submit bills for payment and bookkeepers mail checks in a timely manner.
6. Beginning immediately, all area social work supervisors should require social workers to submit bills on a regular basis.
7. County office bookkeepers should immediately begin to check the billing or invoice date to identify those invoices which have not been submitted by social workers for payment within a week of billing or receipt of invoice.
8. Beginning immediately, area social work supervisors should require that invoices or original bills be obtained in advance of payment as required by policy.
9. When possible, social workers should obtain all bills at time of service, such as the day of psychiatric care, and not wait to be billed by the service provider.
10. Area social work supervisors should immediately begin to:
 - monitor to see that writing child service checks without obtaining proper documentation occurs only in emergency situations; and,
 - check records regularly to monitor which social workers have not obtained bills or receipts for expenditures for which they are responsible.
11. Bookkeepers should immediately begin to submit weekly reports to area social work supervisors informing them of checks written without obtaining documentation according to policy.
12. The Rankin County Board of Supervisors should work with the area social work supervisor to establish the level of need for a working capital fund for child service payments in the Rankin County office.
13. The OSS Rankin County bookkeeper should request that the state pay each vendor bill directly until a capital fund can be included in the Rankin County budget.
14. In regard to Medicaid procedures:
 - Social workers, or preferably social service clerks who may be available in future, should register children for Medicaid eligibility as soon as possible and then locate doctors who are Medicaid providers;
 - Supervisors and bookkeepers, who both must sign the request forms, should also monitor whether social workers have registered children for Medicaid in every possible case;

- OSS area directors should re-emphasize to all workers the importance of registering children to receive Medicaid as soon

as possible and should coordinate with area social work supervisors to provide any training or retraining that may be necessary regarding Medicaid eligibility procedures.

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A Review of the Office of Social Services of the Division of Family and Children's Services

INTRODUCTION

The Department of Human Services was established in 1989 as part of the executive branch reorganization for consolidation of related social services. Within the department's Division of Family and Children's Services, the Office of Social Services (OSS) administers prevention, protection and placement programs for children and families. PEER received complaints concerning OSS, including the office's timeliness in investigating reports of suspected abuse, alleged understaffing, oversight of the foster care program, and timeliness in payments to vendors.

Authority

In response to a legislative request, the PEER Committee began this operational review of the Office of Social Services of the Division of Family and Children's Services, Department of Human Services, at its October 2, 1991, meeting. The review was conducted in accordance with MISS. CODE ANN. Section 5-3-57 (1972).

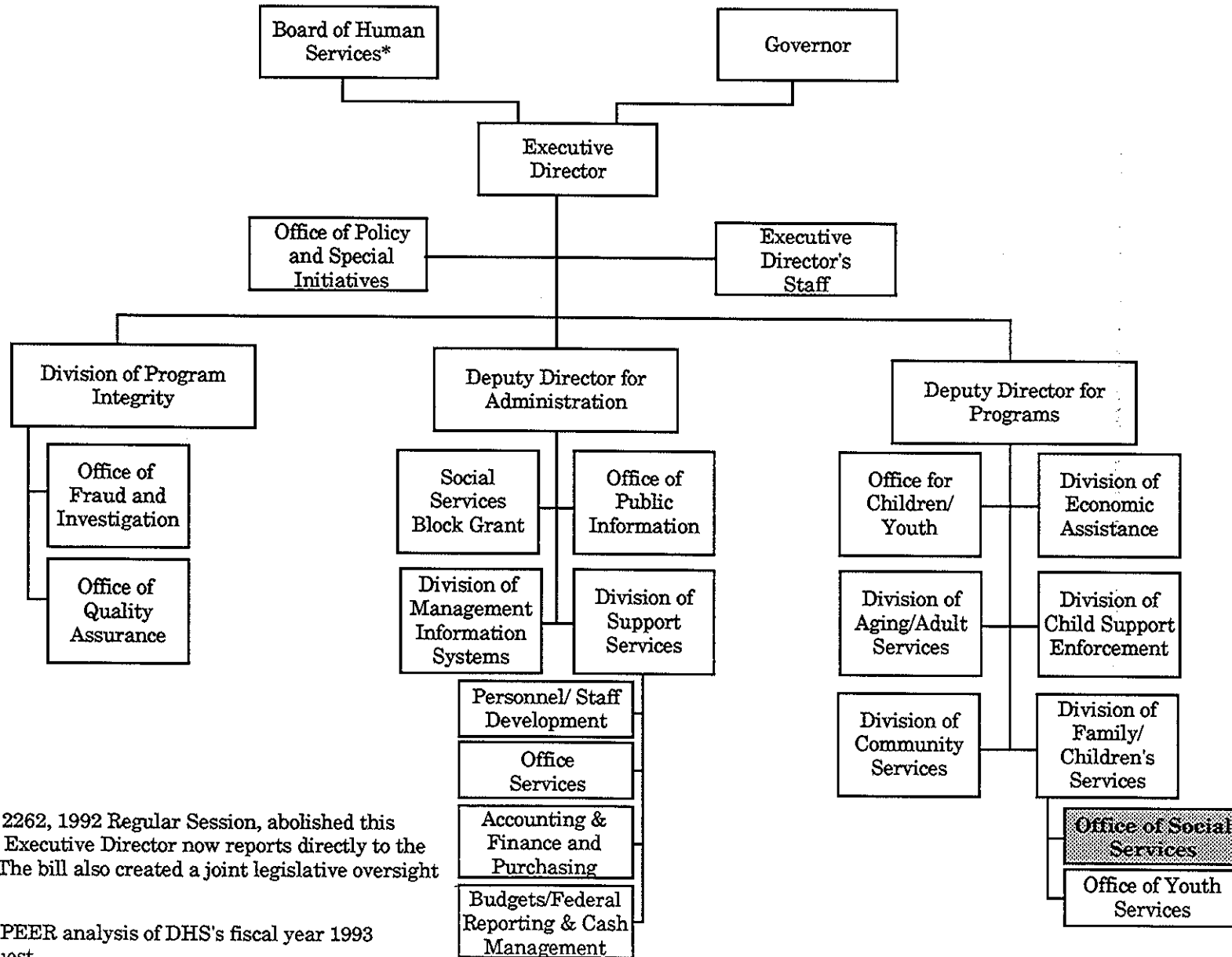
Purpose and Objectives

The purpose of the study is to determine whether the Office of Social Services, as currently staffed and administered, provides family and children's services (child protective and placement) in a manner that serves the best interests of the state's citizens. Of special concern in the review is the office's performance relative to allegations of service deficiencies lodged by interested social service professionals, representatives of the legal community, and other concerned citizens in Hinds and Rankin counties. The objective of the review is to provide the Legislature with information on how well the department currently carries out its social service function, whether current resources are adequate to address the needs of the state, and whether the resources that are available are appropriate to the tasks assigned.

Scope and Methodology

This report addresses the operation of the Office of Social Services of the Division of Family and Children's Services of the Department of Human Services. (See Exhibit 1, page 2.) It should not be viewed as an evaluation of the Department of Human Services as a whole. The report provides a brief history of the Division of Family and Children's Services, a rationale

**EXHIBIT 1
DEPARTMENT OF HUMAN SERVICES
ORGANIZATION CHART**



* Senate Bill 2262, 1992 Regular Session, abolished this board. The Executive Director now reports directly to the Governor. The bill also created a joint legislative oversight committee.

SOURCE: PEER analysis of DHS's fiscal year 1993 budget request.

for its creation, a summary of OSS budget information, and an overview of the division's organization structure. PEER's assessment of division effectiveness addresses current employment standards, training, and employee appraisal, followed by an analysis of the adequacy of OSS staff resources and an assessment of the utility of the division's management information system. The report also pays specific attention to the adequacy of the quality assurance efforts of OSS staff. Subsequent sections of the report evaluate the effectiveness of OSS in providing care for children in custody of the state. The report concludes with a review of selected OSS financial management issues in Hinds and Rankin counties.

In conducting the review, PEER initially held a hearing to receive complaints related to the performance of the division. Based on the concerns arising out of the hearing, and on specific complaints received through other sources, PEER conducted a verification review. As a part of the verification process PEER performed on-site reviews at the central office of the Division of Family and Children's Services, at two regional offices and three county offices purposely selected to represent a contrast of office types from large urban to small rural. In the course of the review, PEER staff utilized interviews, questionnaires, and direct inspection of records, files, and documents relating to the timeliness and quality of service provided by division personnel. PEER included social service staff representing most levels of the organizational structure, as well as interested and knowledgeable persons from outside the department, in the intensive interviews.

Overview

The purpose of PEER's review was to provide the Legislature with perspective on whether the Office of Social Services of the Division of Family and Children's Services, as currently staffed and administered, provides family and children's services in a manner that serves the best interests of the state's citizens. In addition to providing background on the history and funding of the Division of Family and Children's Services, PEER assessed employment, training and employee appraisal systems; analyzed the adequacy of OSS staff resources; and assessed the utility of the division's management information system. Because of complaints received regarding the performance of OSS programs, PEER also assessed the adequacy of the quality assurance efforts of OSS staff, the effectiveness of OSS in providing care for children in custody of the state, and selected OSS financial management issues in Hinds and Rankin counties.

Child abuse is a large, complex, and enduring problem that deserves government's attention. In calendar year 1991, 4,091 substantiated cases of child abuse were recorded in the state of Mississippi, with the number of reports rising by twenty-two percent over the past six years (1985-1991). Many social service professionals view the governmental response to child protection as inadequate. Although the general approach taken by the

government is thought to be appropriate for saving children, protective services programs have been limited in their effect. This is not to say that progress has not been made in creating a system of support and protection or that the system is totally unresponsive and lacking merit.

For example, the current organization structure and assignment of responsibilities for the Division of Family and Children's Services is in keeping with the intent of Sections 35-41, Chapter 500, *Laws of 1986*, and the statute provides an appropriate and viable model for service delivery. PEER finds no compelling reason for the department to turn away from the organizational constructs contained in the 1986 legislation. However, the division is not without its weaknesses and PEER finds support for many of the complaints lodged against it.

The OSS is characterized by a complex work environment where overall success is highly dependent on the performance of individuals and where the consequences of individual failure tend to be very serious. Enormous diversity exists in how well the service and quality assurance system works within and among the division's various levels of responsibility. For every example of poor performance on the part of a direct service worker, supervisor, or manager, PEER found an example of exemplary performance.

This diversity of performance is the most telling aspect of OSS operations, pointing to one of the most obvious deficiencies in the Office of Social Services' current operational structure. This deficiency is that the OSS's accountability system is not truly an integrated, self-correcting system capable of identifying and addressing individual failures and needs. As a result, the Office of Social Services has neither identified its weakest employees and systems, nor has it reached its fullest service potential. Poorly performing individuals and systems are allowed to reflect poorly on the majority of service systems and direct service workers that do not have significant problems with competency or performance.

Within the Office of Social Services, the following major elements of a comprehensive accountability system would help to control this condition. Currently, these components are either missing or are in need of refinement:

- valid employment standards;
- relevant initial training and continuing education requirements;
- a routinely conducted, quality-based employee appraisal system;
- an ongoing assessment of the adequacy and placement of staff resources; and,

- a recording and documentation system that provides management with timely and accurate exception reports for system correction.

As a consequence of the the Office of Social Services' failure to place the needed emphasis on accountability, deficient conditions exist which require immediate action from departmental leaders. However, action must be preceded by purpose, taking care not to harm the programs or people that are producing desired results.

The best strategy for making needed changes at OSS as constructive as possible involves at least two components: identifying exemplary performers in the system, and involving them in making needed accountability refinements. The regional service concept has potential for information feedback which can be used in identifying the need for and form of change. PEER's recommendations serve as a beginning for the needed change and deserve careful consideration in light of OSS's need for an improved accountability structure.

SUMMARY OF HEARING: CHILD ABUSE AND CHILD WELFARE SERVICES IN MISSISSIPPI

On November 26, 1991, the PEER Committee held an investigative hearing to bring immediate attention to the issues of child abuse and child welfare in the state and to develop clearer definitions of public concerns which would require further legislative attention and review. The following social service professionals participated in the hearing: a youth court judge, a clinical practitioner in the field of treatment of child abuse, a social worker, a former social worker experienced in children's protective services, a Department of Human Services board member, the then-directors of the Department of Human Services and its Division of Family and Children's Services, and the director of a human services advocacy group.

The following section summarizes the Committee's interpretation of major concerns brought forward in the hearing and provides additional descriptive information as a backdrop for interpreting the remainder of the report. *These comments are based solely on the hearing and are not meant to reflect the PEER Committee's conclusions regarding the performance of the Office of Social Services.*

Child abuse is a large, complex, and enduring problem

In calendar year 1991 there were 4,091 substantiated cases of child abuse recorded in the state of Mississippi, with the number of reports rising by twenty-two percent (22%) over the past six years (1985-1991). Some experts believe that this rise in reported abuse does not necessarily reflect a rise in the incidence of abuse, but rather is a reflection of an increase in society's awareness of the problem. Others feel that the increase is real and that it is a reflection of declining family and social values. No one knows for sure, because no one knows how many cases go unreported each year. What is known is that it is a serious problem with significant social and economic costs to the state, well deserving of the best efforts.

- *Why does child abuse occur?*

The answer to this question is complex. Experts agree that a number of factors contribute to the potential for abuse: poverty, ignorance, alcohol and drug abuse and any number of related social and psychological problems which pervade our society. However, these are not the only contributing factors and child abuse may be found in all socioeconomic strata. We do know that child abuse is frequently passed on from generation to generation and that children who have been abused tend to become abusers. Thus, there is great potential for prevention if this cycle can be broken.

- *What can be done to break the abuse cycle?*

First, the abuse must be identified and stopped. Second, the abused individual must be provided psychological therapy to restore emotional health. Cases that go untreated or are treated inadequately contribute to a continuation of the abuse cycle.

- *Is child abuse easy to identify?*

Child abuse often is well concealed and is difficult to substantiate. It follows then that the professionals responsible for identifying abuse and offering help must be well trained in both identification and remediation to be effective. If not, they are likely to misclassify a significant number of cases and to provide little or no real support in cases where abuse is accurately identified.

- *How are we doing in response to the problem?*

The generally held opinion among social service professionals is "not very well."

The governmental response to child abuse is inadequate

Government's efforts to deal with the problem of child abuse on a broad scale are relatively new, even on a national level. In addition, although the general approach taken by the government--intervention in the home and removal from the home in severe cases--is thought to be an appropriate course for saving children, implementations of protective services programs have been limited in their effect.

- *Why should this be the case?*

There are at least two broadly held views among the major critics of the social service system in Mississippi. First, there is the belief that there is a significant resource problem in the state. Proponents of this view feel that the state is not attracting and retaining well-qualified social workers in sufficient numbers to keep pace with the ever-increasing volume of cases. Second, there is equal concern over the quality and use of the resources that do exist. Proponents of this view feel that many of the front-line social workers currently serving in Mississippi, and their immediate supervisors, are not qualified to do their jobs, since many social workers have no relevant education or experience when they are hired. Although these two views suggest differing solutions to the problem, they are not mutually exclusive. In fact, many critics espouse both views and feel that an

adequate solution must address both sources of concern. It is their position that the state must not only put additional resources into child protection, but that it must also insure that current workers are given the specialized knowledge, skills and abilities required for high quality protective service, supervision, and placement work.

- *Why does work of this type require specialized knowledge, skills and abilities?*

Child neglect or abuse usually occurs in dysfunctional homes. As such, the attending problems are very complex, with causes that are often difficult to find or cure. Improperly trained social workers can easily endanger the child they are trying to help. The decisions that must be made require a level of professional sophistication that less highly trained workers simply do not have.

- *What, then, is the answer?*

Central to many of the suggestions posed as solutions to the problem of child abuse is the belief that government should better manage the resources that it has in place to meet the protection and placement needs of the state. The current report identifies critical areas where better management is needed and makes recommendations for change.

**BACKGROUND ON THE DIVISION OF FAMILY
AND CHILDREN'S SERVICES AND THE OFFICE
OF SOCIAL SERVICES**

History of the Division

The Legislature created the Division of Family and Children's Services as a single and separate division within the State Department of Public Welfare in 1986 [Laws, 1986, Chapter 500, Sections 35-41]. Authority for the division was continued with passage of the Mississippi Executive Reorganization Act of 1989 [Laws, 1989, Chapter 544], which, among other things, abolished the Department of Public Welfare and transferred responsibility for the social service division to the newly created Department of Human Services to become the Office of Social Services of the Division of Family and Children's Services. The Reorganization Act also abolished the Department of Youth Services and added responsibility for its duties to the Division of Family and Children's Services. The old Department of Youth Services became the Office of Youth Services, responsible for community and residential care of delinquent youth, while responsibility for child and adult protection, foster care, and adoption was given to the Office of Social Services.*

The Division of Family and Children's Services was originally created in response to concerns that the public assistance responsibilities of the Department of Public Welfare tended to dominate or take precedence over its social service responsibilities. In addition, county-level responsibility for the quality of social services delivered was often vested in county directors with little or no social service training, thus creating a significant problem with supervision and quality control in this highly specialized field. The end result of these concerns was creation of the division to provide a focal point for social service initiatives within the department and to respond to the need for a more efficient and accountable alternative to the social service structure that had evolved within the Department of Public Welfare. The 1986 enabling legislation which created the division stated that it was ". . . *the intent of the Legislature that resources devoted to family and children's services and to public assistance programs be clearly delineated and that all resources intended for child protection and other related purposes be expended in service of that goal.*"

* The PEER Committee's May 26, 1992, report (**A Review of Management of the Office of Youth Services by the Department of Human Services**) addressed the management of the state's juvenile correction and rehabilitation program since the 1989 executive branch reorganization. See the executive summary of this report in Appendix A, page 71.

Organization of the Division

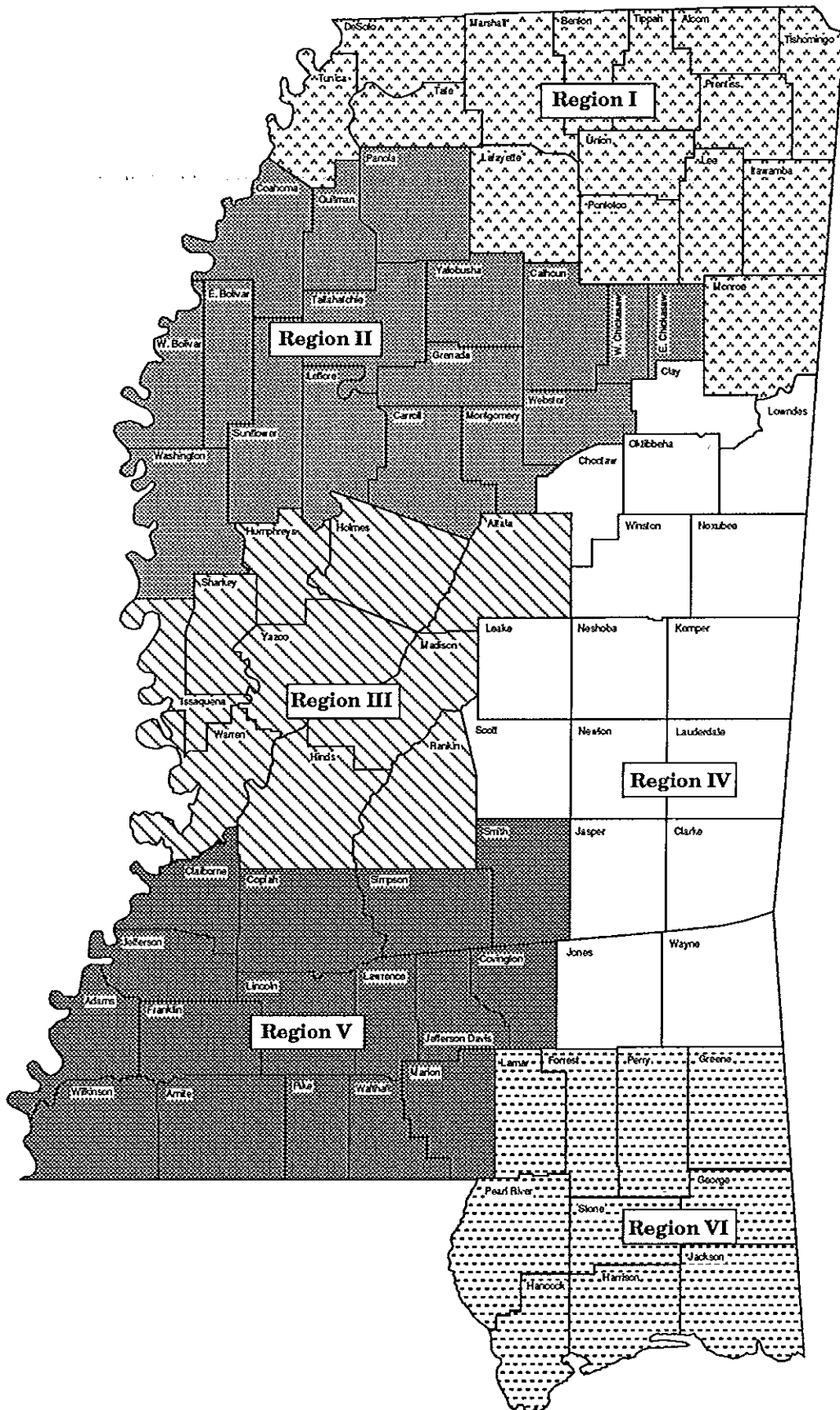
MISS. CODE ANN. Section 43-1-51 et seq. (1972) delineates the service responsibilities of the the Division of Family and Children's Services, specifies a regional organization structure, establishes the qualifications of its director, stipulates the development of standards for employment and service delivery, and requires the development of recordkeeping and intake procedures.

The division is to be headed by a division director with either a master's degree in a field related to children's services and three years' children's service experience or ten years' actual experience in the field of children's services. The division is to have state, regional and county components with the state office responsible for the development of policy, the provision of training, and oversight of service implementation. Regional service directors and crisis teams are also specified to provide the primary link between the local and state components of the service structure and to give the regions the ability to respond to crisis situations with additional expertise when needed. DHS has defined six service regions for the state (see Exhibit 2, page 11). By statute, each region must further be divided into three service areas (a service area may be part of a county, a whole county, or more than one county, depending on need) with at least two supervisors and eighteen direct service workers per area deployed at the county level. Although assigned to a county, direct service workers (social workers) may be given an assignment within any county in the service area on a needs basis.

The perceived strengths of the proposal to create a separate division responsible for social services were its clearly defined service roles, its emphasis on qualified leadership and staff, its use of planning and policy councils to insure an efficient and effective link between division policy and implementing procedures, its mandate for social worker employment and service delivery standards, its ability to provide crisis intervention support to staff, its improved record keeping requirements, and its potential for a "lean" administrative overhead.

The enabling legislation which established the division serves as recognition that the specialized social service role of the division requires staffing by professionals with specific knowledge, skills and abilities that are distinct from those required by the public assistance programs and that requirements for supervision and documentation differ as well. With creation of the Division of Family and Children's Services, the Legislature attempted to create a social service structure with greater flexibility in the use of available resources, more autonomy for a professionally well-trained staff, higher quality documentation and supervision standards, better interagency collaboration, more appropriate specialization into service and support functions, and additional opportunities for innovation.

EXHIBIT 2
OFFICE OF SOCIAL SERVICES'
REGIONAL SERVICE AREAS



SOURCE: Office of Social Services

Concerns About OSS's Regional Service Structure

During the course of the review PEER found some sentiment for abandoning the regional service structure of the Office of Social Services and returning responsibility for social services to the county level. The arguments generally focused on the need for more direct supervision of social workers by county-level administrators and the removal of at least one level of bureaucracy. Proponents of a return to county-level control of the social service structure see the supervision of social workers by an area social work supervisor as inadequate and the regional office as administratively unnecessary. They believe that consolidating all programs within the county office would allow the county director to provide daily supervision to all DHS employees, especially relative to work habits. In addition, they believe that the single county office would be less confusing to the public seeking services.

The following paragraphs contain PEER's analysis and conclusions regarding the continued appropriateness of the 1986 legislative mandate for a regional service structure for the Division of Family and Children's Services.

Current organization structure and assignment of division responsibilities for the Division of Family and Children's Services is in keeping with the intent of Sections 35-41, Chapter 500, Laws of 1986. The PEER Committee finds no compelling reason for the department to turn away from the organizational constructs contained in the 1986 legislation.

PEER finds several problems with the idea of returning social workers to supervision by county-level administrators. The first problem relates to the idea of qualified supervision. The type of supervision needed by workers in the social service system requires a supervisor with knowledge and skill in the service professions. While putting the social work staff under the supervision of a county director would help ensure daily monitoring of work habits, it would not necessarily provide the service supervision needed. To provide such would require either that county directors have social service credentials or that they be given additional trained workers to assist in supervision. Second, classifying the regional staff as "administratively unnecessary" is misleading. In addition to having administrative responsibilities, area staff have advanced training in social service delivery and are an integral part of the quality assurance system. Additionally, they serve as a link to the central office in providing policy input from direct service workers and for allocating staff resources within the service areas in the most efficient manner possible. Finally, coordination and cooperation among the various services offered by the DHS does not require a county-based structure to be efficient or successful. In fact, allowing the reallocation of resources within a service area is a more efficient use of scarce resources.

The current administrative and service structure of the Division of Family and Children's Services provides for clearly defined channels of communication throughout the division and would appear to facilitate the accomplishment of division objectives through the timely and accurate dissemination of social service program policy information. Social service delivery and policy formulation are well integrated with adequate provision made for the flow of information up and down the administrative chain of command. The exception to this observation is that the Office of Youth Services is yet to be fully integrated into the division. (PEER reported on the management of the state's juvenile correction and rehabilitation program since the 1989 executive branch reorganization in **A Review of Management of the Office of Youth Services by the Department of Human Services** [May 26, 1992]. The Committee found that the merger of Youth Services into the Division of Family and Children's Services has affected program structure very little, did not reduce duplication and fragmentation of children's services, and is administratively less efficient. See Appendix A, page 71, for an executive summary of the report.)

However, as a rule, the division's failures to communicate represent failures of individuals, not failures of the system. While informal information channels continue to exist throughout the division, they are much less important as a source of policy interpretation. Workers can now receive policy guidance from their immediate supervisors without having to seek advice from a state-level policy division. As a result, program decisions requiring policy interpretation can be made in a timely manner without unnecessary delays. In summary, the division has simplified its communication channels and has improved the flow of information throughout the organization, resulting in a generally more efficient, timely and accurate transfer of service-related information from one functional level of the division to another.

As stated, the PEER Committee finds no compelling reason that the department should turn away from the organizational constructs contained in the 1986 legislation which created the Division of Family and Children's Services. The proposed strengths and benefits of a regionally based, professionally staffed social service structure for the state is as valid a concept today as it was in 1986. The relevant questions are whether creation of the division has produced a more responsive service delivery structure and whether the division has attained or is moving toward the benefits envisioned for the system.

Office of Social Services' failures to produce more responsive service delivery structures or to attain the benefits envisioned for the regionally based social service system have resulted from deficiencies in the current quality assurance system rather than failures of the regional social service concept.

While, as this report will show, there is some factual basis for many of the complaints lodged against the performance of the division, progress has been made in the overall structure and operation of the Office of Social Services. The more dramatic failures have tended to be failures of individuals to carry out properly assigned responsibilities and duties and failures of the quality assurance system to quickly isolate those cases for review, not failures of the system as a whole. Even in the dramatic cases where the result was the death of a child, had all involved parties been properly trained in and followed division policy, the risk could have been reduced, though probably not eliminated. Interviews and on-site inspections reveal that the division is characterized by a complex work environment where overall success is highly dependent on the performance of individuals and where the consequences of individual failure tend to be very serious and reflect badly on the organization as a whole. Society justifiably tolerates little error from its service agencies when the lives of children and families are in the balance. However, it creates an environment in which every element of the system, from direct service, to quality assurance, to policy setting and program development, must work in concert.

PEER finds a great deal of diversity in how well the service and quality assurance system works within and among the division's various levels of responsibility. For every example of poor performance on the part of a direct service worker, supervisor, or manager, there was an example of exemplary performance. For every example of bureaucratic inefficiency, there was an example of a creative exercise of responsibility. Some possible reasons for diversity in the quality of performance will become obvious as the report unfolds. The point here is that a blanket description of the division as a whole is virtually impossible. While the basic structure of the division is sound, specific deficiencies and areas where improvement is needed can be identified.

Recommendations

1. In the absence of compelling evidence to the contrary, the Department of Human Services should retain the regional service concept for the Office of Social Services and use it as intended as a basis for improving the state's social service system.
2. The Department of Human Services should make every effort to insure that a comprehensive accountability system is in place within the Office of Social Services and that it functions as an integrated, self-correcting

system capable of identifying and addressing individual failures and needs. The proper elements of a comprehensive accountability system include at least the following basic components:

- valid employment standards;
- relevant initial training and continuing education requirements;
- a routinely conducted, quality-based employee appraisal system;
- an ongoing assessment of the adequacy and placement of staff resources; and,
- a recording and documentation system that provides management with timely and accurate exception reports for system correction.

Office of Social Services Revenues and Expenditures

In conjunction with reviewing the financial management of the Office of Social Services (see pages 62 through 70), PEER reviewed OSS's revenues and expenditures.

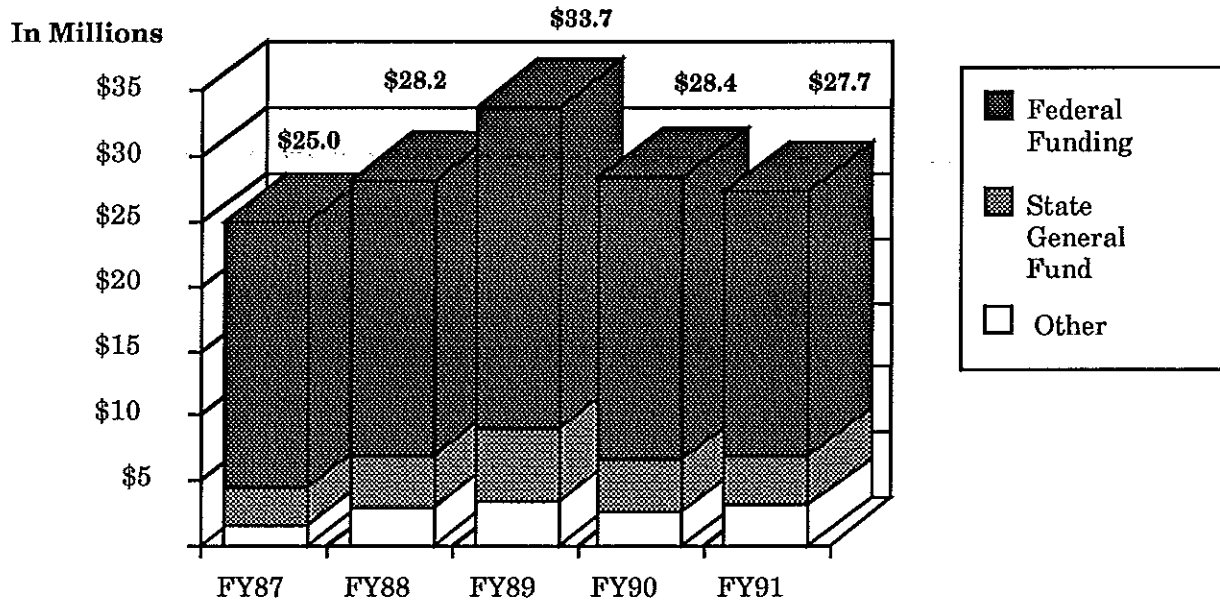
Trends in Office of Social Services Expenditures

Office of Social Services expenditures grew from approximately \$25 million in FY 1987 to \$33.7 million in FY 1989. (See Exhibit 3, page 16.) OSS expenditures dropped to \$28.4 million in FY 1990 primarily due to the transfer of the \$4.7 million day care program from OSS to the Office for Children and Youth. In FY 1991 the 5% state budget cuts, accompanied by hiring freezes, decreased expenditures to approximately \$27.7 million.

Sources of Office of Social Services Funding

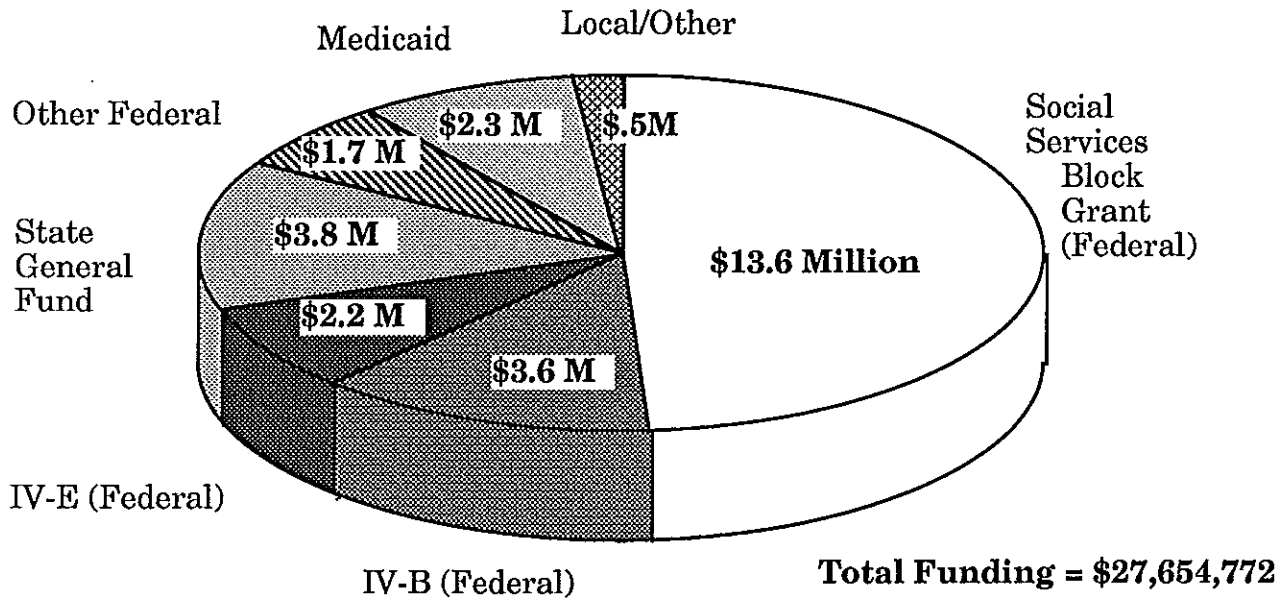
As shown in Exhibit 3, the federal government funds the bulk of Office of Social Services programs. In FY 1991, federal funding totaled \$21 million, or 76% of OSS expenditures. Exhibit 4, page 16, breaks OSS FY 1991 expenditures down into major sources of funding. At \$13.6 million, the Title XX Social Services Block Grant (SSBG) is OSS's primary source of funding at 49% of FY 1991 expenditures. The SSBG grant, which requires no state match, is channelled to OSS and other state agencies through the SSBG administrator's office, currently housed under the Executive Director of DHS. The Department of Mental Health, the Department of Health, the DHS Office for Children and Youth, and the DHS Division of Aging and Adult Services also receive a portion of the total federal block grant to Mississippi. OSS receives approximately 44% of the \$29 million yearly SSBG grant while the other four agencies receive about 56%. SSBG funds

EXHIBIT 3
TRENDS IN OFFICE OF SOCIAL SERVICES EXPENDITURES
BY FUNDING SOURCE



SOURCE: Department of Human Services and Office of Social Services budget requests for fiscal years 1989 to 1992 and a FY 1991 DHS Budget Office Report.

EXHIBIT 4
OFFICE OF SOCIAL SERVICES SOURCES OF FUNDING
FOR FISCAL YEAR 1991



SOURCE: Department of Human Services (DHS) Budget Office. Total Funds of \$27,654,772 differ from DHS figures in Exhibit 6 by \$250,619 due to DHS's method of estimation based on the cost allocation system.

are used for social services to assist individuals in becoming self-sufficient and protecting vulnerable individuals. Specifically in the OSS department, SSBG funds are used for prevention of neglect and abuse of children, protection of children, and placement of children in out-of-home settings when necessary.

Title IV-B of the Social Security Act, the second largest source of federal funding to OSS, also provides funds for services to improve the welfare of children. OSS's IV-B expenditures were \$3.6 million, or 13% of the total FY 1991 expenditures. In order for OSS to receive IV-B funds, the state must match IV-B sources by 25% of the total.

Federal funds under Title IV-E of the Social Security Act (IV-E) totaled \$2.2 million, or 8% of OSS's FY 1991 expenditures. Title IV-E allows states meeting certain requirements to make foster care payments to eligible children and adoption assistance payments to special needs and handicapped children. The state matches IV-E funds approximately 20% for foster care board payments, 50% for administration and 25% for training.

OSS received Medicaid funds in the amount of \$2.3 million, or 8% of the expenditures. The Medicaid funds consisted of approximately \$400,000 in reimbursements for social worker time spent on arranging transportation of Medicaid patients to visit medical facilities and \$1.9 million in mileage reimbursement from Medicaid for these activities.

OSS also received \$1.7 million in federal grant funds, 6% of the total, for programs such as the protection of refugees, the prevention of child abuse, and independent living skills for teaching older foster children how to live independently of foster parents. Other sources such as local boards of supervisors provided the smallest portion of funding to OSS during FY 1991 in the amount of \$496,415, or 2% of expenditures.

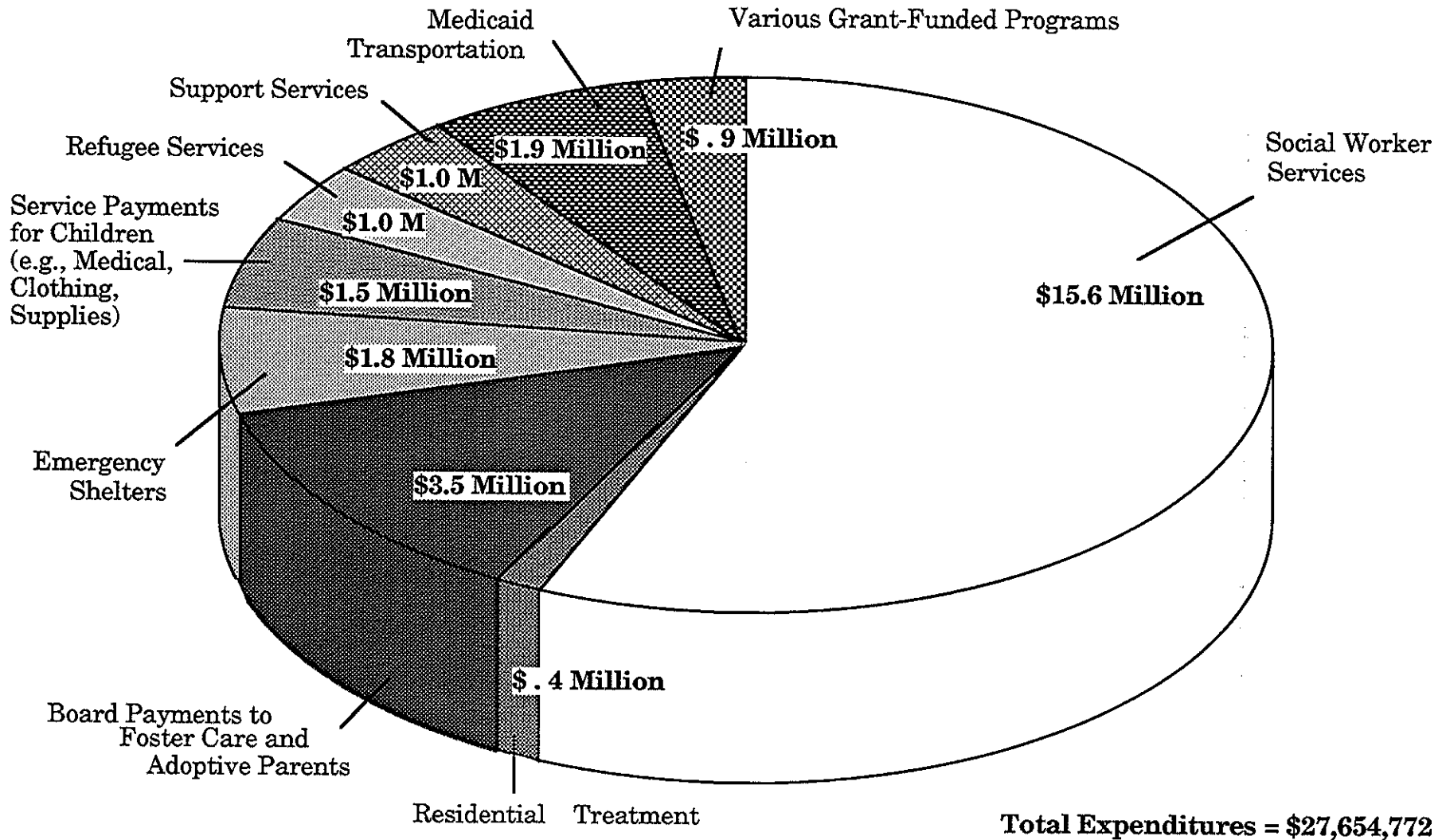
The remaining \$3,773,005, or 14% of expenditures, was paid by the state.

Expenditures by Type

Exhibit 5, page 18, outlines the resources expended for various services provided by OSS. These services are explained below:

Social Worker Services--OSS spent 57% of its resources in FY 1991, or \$15.6 million, for services provided by social workers. These social worker services, consisting largely of salaries, represent social workers' time spent in working with children and their families in prevention, protection, and placement functions. This service category also includes clerical and administrative salaries and other resources such as supplies expended in performing these duties.

**EXHIBIT 5
OFFICE OF SOCIAL SERVICES EXPENDITURES BY TYPE FOR FY 1991**



SOURCE: Department of Human Services (DHS) Budget Office. Total Expenditures by Type of \$27,654,772 differ from DHS figures in Exhibit 6 by \$250,619 due to DHS's method of estimation based on the cost allocation system.

Board Payments--OSS also spent a total of \$3.5 million for board payments. Of this amount, foster parents received \$2.9 million in monthly payments to care for children in the custody of the state. Families who adopted state custody children with special needs, such as emotional disturbances and physical handicaps, received \$654,178 monthly to help care for these children.

Service Payments for Children--This category includes expenditures to care for children who have been taken into custody by the state. The \$1.5 million included medical exams, psychological exams, clothing for those children initially taken into custody who were in need, school supplies and other items needed to care for the children.

Residential Treatment--OSS spent \$368,083 to place children in residential treatment facilities. Some children in state custody are severely disturbed emotionally, stemming primarily from abuse by their parents. Others are mentally retarded or are diagnosed with both of these problems. As a result, the state places these children in facilities where they can live and be treated for their problems.

Emergency Shelters--OSS runs three emergency shelters for children in the state. OSS social workers can place children in these facilities who need protection from their parents while awaiting placement in foster homes or other facilities. OSS spent \$1.8 million to run these facilities in FY 1991. OSS has made plans to close these facilities due to high operating costs and transfer them to private ownership. OSS will then place children in private emergency shelter facilities.

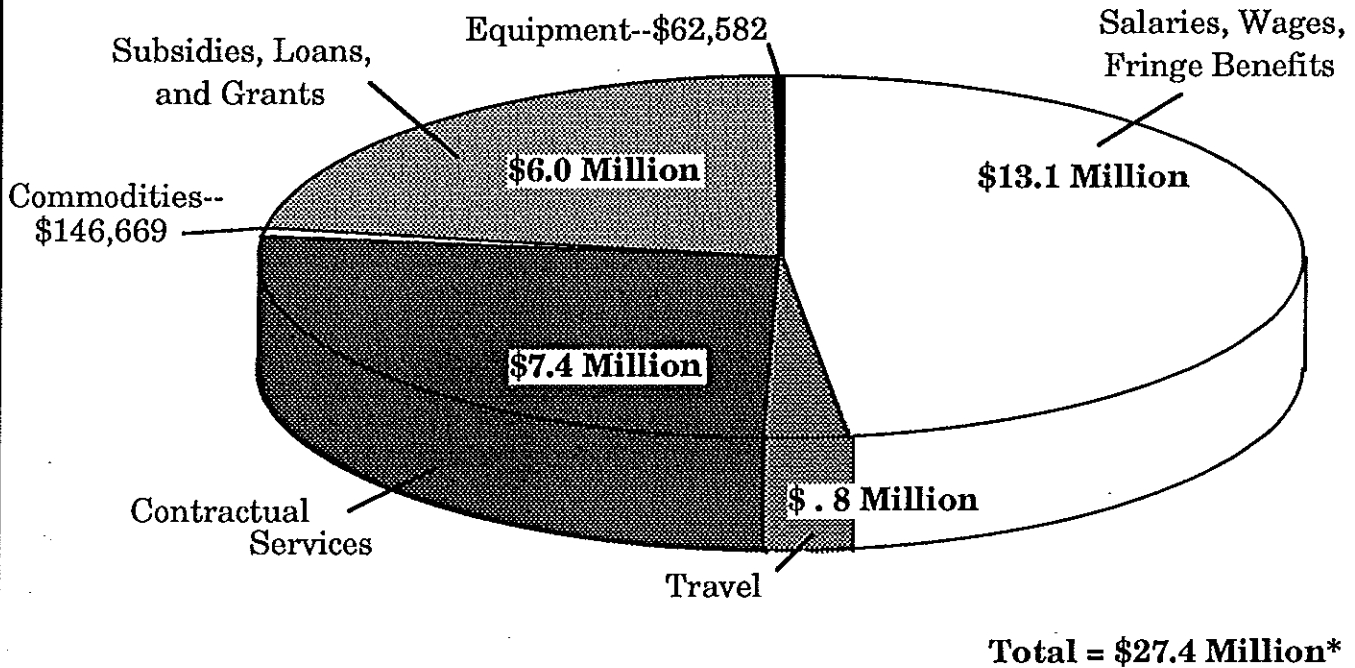
Governor's Office of Medicaid--OSS contracted with the state Medicaid program of the Governor's Office to arrange for transportation of Medicaid recipients, both children and adults, to medical facilities. This is arranged because OSS has the network of service workers in the state to handle this time-consuming activity. OSS spent \$1.9 million in transportation costs to perform this service which was reimbursed by the Office of Medicaid.

Other Expenditures--OSS spent \$1 million, funded 100% from federal sources, to care for refugees in the state and spent \$861,017 to carry out six special projects which were funded almost entirely by federal grants. The \$1 million spent in support services represents amounts paid to DHS's Support Services division through a cost allocation plan. Support Services expenditures cover accounting and data processing services and the administration of the DHS Executive Director's office. The expenditures of the OSS central office are considered a part of programs from the standpoint of federal receipts and are included primarily in the social worker services category.

Expenditures by Budget Category

Exhibit 6, page 20, outlines the distribution of OSS FY 1991 expenditures by budget category. OSS spent \$13.1 million, or 48% of its budget, for salaries and fringe benefits; \$7.4 million for contractual services such as emergency shelters, residential treatment, and Medicaid transportation contracts; and \$5.9 million in subsidies, loans and grants primarily for board payments and service payments for children.

**EXHIBIT 6
OFFICE OF SOCIAL SERVICES FISCAL YEAR 1991
EXPENDITURES BY BUDGET CATEGORY**



SOURCE: Office of Social Services Budget Request for Fiscal Year 1993.

*Total Expenditures by budget category of \$27.4 million differ from DHS figures in Exhibits 3, 4 and 5 by \$250, 619 due to DHS's method of estimation based on the cost allocation system.

DIVISION EFFECTIVENESS

Employment Standards, Training, and Appraisal

The Office of Social Services has failed to reach its fullest service potential due to the absence of well-trained professionals at all levels and to failures in implementation of the quality assurance system which result in a loss of appropriate feedback to management.

The regional service structure of the Division of Family and Children's Services allows for an appropriate dispersion of program authority and responsibility and the flexible use of resources, but it requires well-trained professionals and a smoothly running quality assurance system to work properly. Failure to have either of these two basic elements fully operational limits the system's effectiveness. Lack of proper training at any staff level or failure of the quality assurance system to identify and address performance deficiencies results in periodic "crises" and a loss of confidence in the individuals involved.

While these points are true with any organizational structure, the regional concept of social service delivery currently in place has the greatest potential for addressing the accountability needs of the state while, at the same time, allowing program and resource responsibility to be vested at an appropriate local level. The problems discussed in the remainder of this report need to be solved within the division's current organization structure. The regional service concept, implemented with properly trained staff and appropriate controls, has great potential. Above all, leadership of the department should avoid major changes in program concept solely in response to external complaints and concerns. The tendency in responding to criticism is to either re-centralize controls or circumvent established lines of authority with informal ones to address the specifics of complaints. Either response may address the immediate symptoms of the problems, but neither truly solves them and neither refines the service delivery process in a systematic and verifiable way.

Employment Standards

- *The Office of Social Services does not require that applicants for the position of social worker have an education relevant to the duties and responsibilities of the position.*

Within the Office of Social Services, individuals in the job class of social worker are responsible for delivering the bulk of services to clients. Of the 348 allocated field level social workers positions in the state, 346 are in the social worker job class. This makes appropriate employment standards for this class of workers especially critical. Currently, the minimum requirements for this position stipulate that an applicant must

have only a bachelor's degree in any field from an accredited four-year college or university. This minimum requirement was upheld in the 1984 title suit *Walls v. Department of Public Welfare*; however, the decision does not preclude the Department of Human Services from devising different educational or experience selection criteria. Such criteria would be permissible so long as they are valid job-related criteria for determining the fitness of a person to hold the job.

The duties and responsibilities of social workers and the situations which they encounter require experience in, or at least knowledge of, the fundamental principles which underlie the practice of social work. These principles, drawn from social sciences such as psychology, sociology, and child development, require specific training and practice to be of maximum value. The responsibilities of a social worker include, but are not limited to, investigating domestic environments, providing supervision for adolescents and developing treatment plans for clients of all ages. Skills related to the accomplishment of such responsibilities are not taught in all educational fields. The training in social work, or closely related social science fields, tends to focus on the knowledge and skills needed in the delivery of social services and should be a requisite for any individual given social worker responsibilities.

Of the 351 persons filling area social work supervisor and social worker positions in the Office of Social Services (394 positions are allocated, with 43 not filled), only 113 have a degree in social work (see Exhibit 7, page 23). Thirty-nine percent of Mississippi's area social work supervisors and social workers do not have a degree in a field related to the delivery of social services. As part of a training program being developed in conjunction with the University of Tennessee (see page 26), the Office of Social Services has proposed that minimal education requirements for the position of social worker mandate a bachelor's degree in social work, sociology, psychology, counseling or child development. At the time of this report, this change in the degree requirements for social workers had not been approved.

In requiring only a general bachelor's degree, the Office of Social Services has no assurance that social workers have acquired the knowledge and background needed to deliver corrective and beneficial social services to clients. In addition, by not requiring evidence of proper training on entry, the office must spend personnel and fiscal resources to train social workers on the needed subjects and skills. The Office of Social Services should develop minimum education requirements for social workers so that they will possess the knowledge, skills and abilities needed to assist clients in the most efficient and beneficial way. By establishing relevant minimum education requirements, the Office of Social Services could put the social worker into field positions much faster and limit its training role to offering refresher courses and updates.

EXHIBIT 7

COLLEGE DEGREES HELD BY OFFICE OF SOCIAL SERVICES AREA
SOCIAL WORK SUPERVISORS AND SOCIAL WORKERS
AS OF APRIL 2, 1992

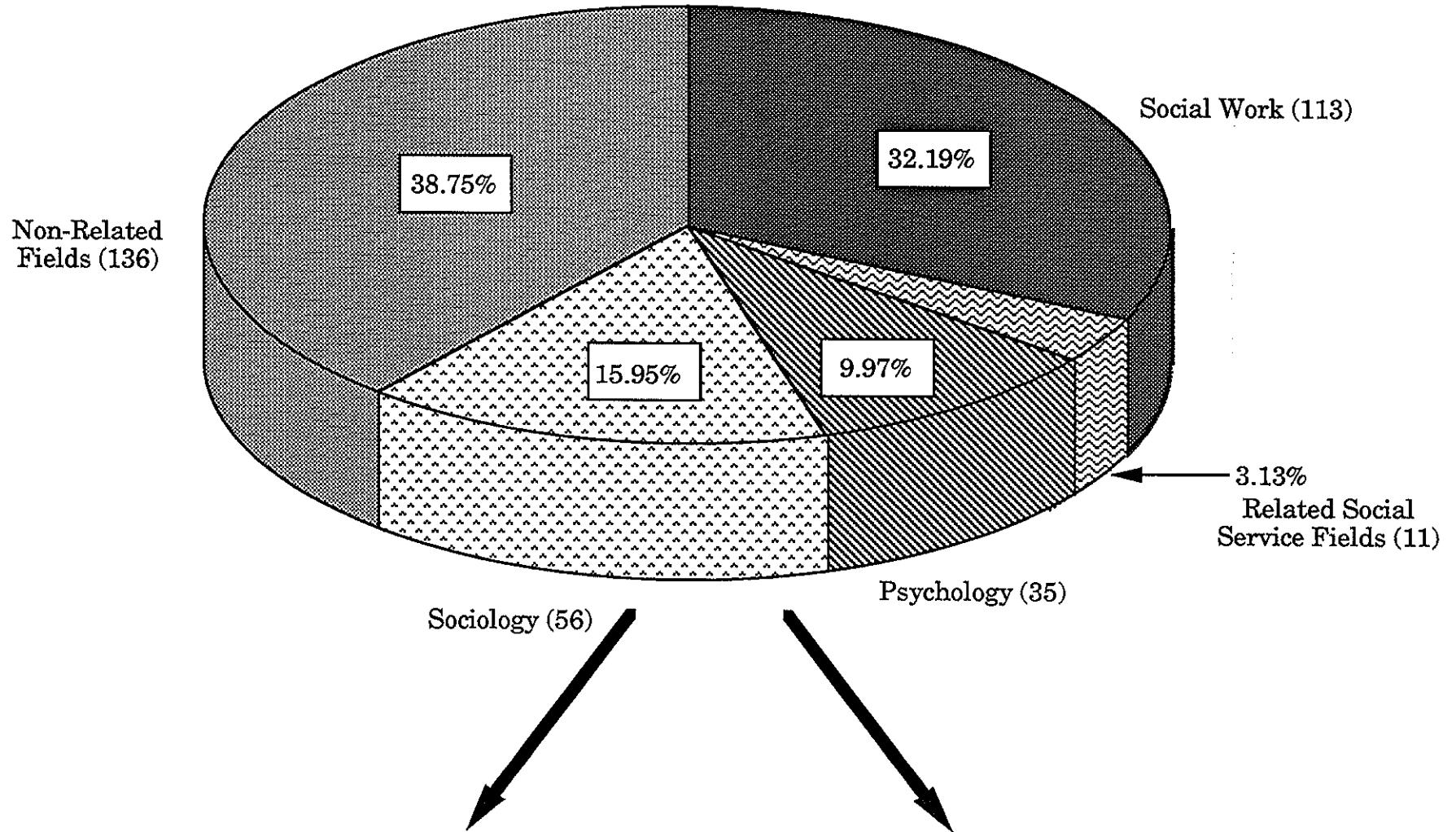
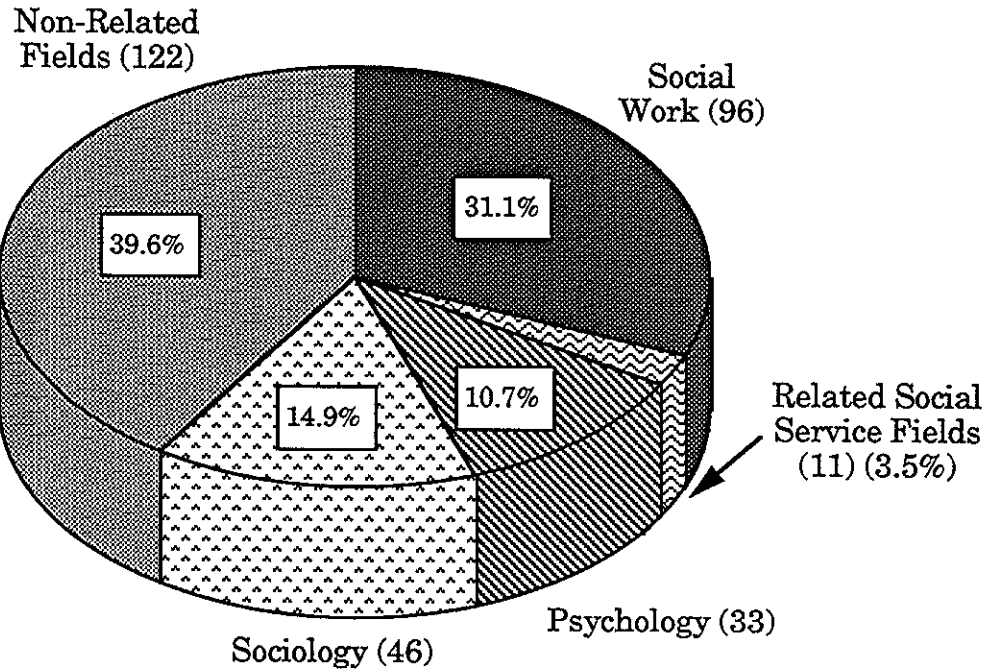
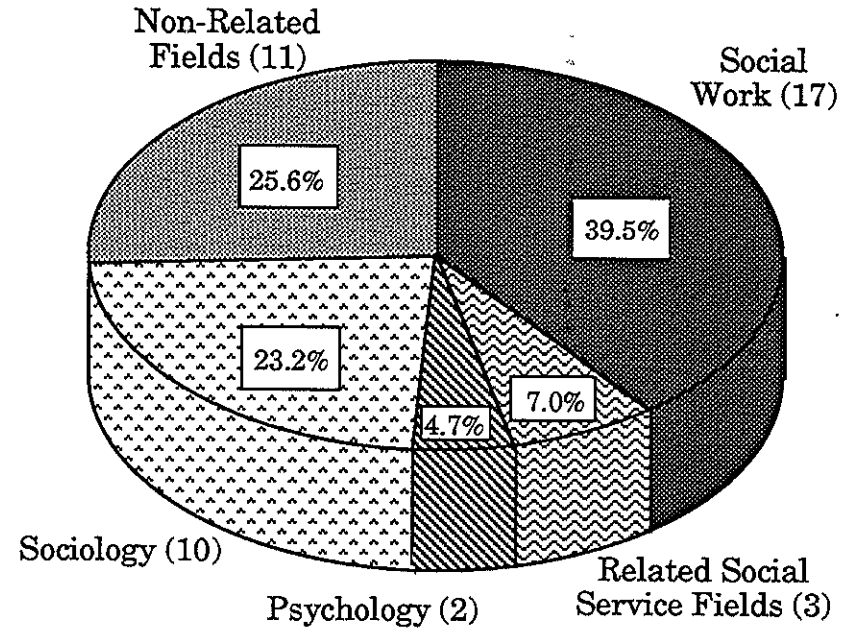


EXHIBIT 7 (continued)

**Social Workers
(308)**



**Area Social Work
Supervisors (43)**



NOTE: "Related Social Service Fields" includes Guidance Counseling, Counseling, Family Life Studies and Child Development. "Non-Related Fields" includes, but is not limited to, Physical Education, Journalism, Agriculture, Secretarial Science, Criminal Justice and Public Relations.

SOURCE: Office of Social Services

Training

- *The Office of Social Services has not provided adequate training to insure that social workers possess the skills and knowledge necessary to perform their job effectively.*

Prior to the abolishment of the training department in 1986 by the Department of Public Welfare, modular training was conducted for all new social workers. This modular training consisted of four elements: a three-week lecture series in Jackson, self-study, training on adult protective services and selected readings. Youth Court officials and departmental employees expressed concern that such training did not provide practical skills needed in the delivery of social services.

Following the abolishment of the above-mentioned modular training in 1986, each program area within the Office of Social Services has been responsible for providing its own training. PEER found that program personnel have presented virtually no training to social workers since that time. In a hearing before the PEER Committee on November 26, 1991, former Department of Human Services' Executive Director Bea Branch stated: *"during the last five years virtually all training for new workers has been eliminated and supervision at the regional level and region three, which includes the Metropolitan Jackson area, was very weak to nonexistent."* No specified continuing education training requirements exist for social workers in Mississippi unless they are licensed social workers, and the Office of Social Services does not require its social workers to be licensed.

Social workers currently begin work with no training beyond what they bring to the job. This means that new social workers are assigned cases, but they have little insight as to how to manage these cases in the most efficient and beneficial manner. Placing workers in the field with no training endangers the well-being of clients of the Office of Social Services.

It is left to each area social work supervisor to provide that area's training for the social workers. More than once, Office of Social Services personnel stated that they felt that area social work supervisors are the weakest link in the training process because many of the supervisors have not been trained themselves. "On-the job" training is perilous if area social work supervisors are untrained or perform work incorrectly. In addition, area social work supervisors devote the majority of their time to the quality assurance review process and simply have little time left for a training role beyond what can be done as a part of case review.

Department of Human Services policies state that the Office of Personnel and Staff Development is responsible for monitoring DHS training activities. Although DHS policy requires that OSS personnel submit training reports to the Office of Personnel and Staff Development, that office does not compile individual training records on each employee

from the training reports. Likewise, the Training Coordinator in the Office of Social Services keeps a copy of all training reports, but does not maintain individual training records. An adequate monitoring system would identify individual employees in need of training and would also identify the areas in which training is needed. OSS personnel reported that plans are underway to establish a computer tracking system within that office to identify employees in need of training, but there is no projected completion date.

Because there is no monitoring of individual training activities, clients have no assurance that social workers receive adequate training to carry out their responsibilities of providing social services. As mentioned earlier, improperly trained social workers can easily endanger the child that they are trying to help. Without proper monitoring of training, Office of Social Services personnel cannot determine whether social workers possess the needed knowledge and skills needed to deliver beneficial social services.

- *Recent steps taken by the Office of Social Services to improve training for social workers could correct many of OSS's training deficiencies.*

The Office of Social Services has taken steps to improve training for new social workers as well as for current employees. OSS is nearing the end of its first year of a contract with the University of Tennessee (UT) for development of a training program for entry level social workers modeled after Tennessee's system. Tennessee's system identifies skills, abilities, information, and core sets of decisions appropriate for an entry level social worker and then presents a program of appropriate training for such. Mississippi's contract provided for a revision of Tennessee's curriculum to reflect our state's policy, practice and law; training of two groups of supervisors; and training of one group of newly hired social workers.

Format and Curriculum of the Program--The UT Certification Program calls for relevant knowledge and skills to be taught to new workers in seven phases, a combination of on-the-job and residential (week-long sessions in Jackson) training in interpersonal skills, assessment, and treatment and prevention of sexual abuse. After ten weeks of training, social workers take an exam; a passing exam grade and one year of satisfactory job performance are required for certification.

PEER observed a session of the pilot training program and found that it encourages active social worker participation. The training material is eye-catching, easy to follow, and is based on "real life" situations. OSS personnel from various levels expressed great support and enthusiasm for the program.

UT Contract with DHS--Mississippi's first-year contract for the UT Certification Program cost \$150,000 and included training three groups of employees. The second-year contract, awaiting approval by the Executive Director of DHS, costs \$447,600, with the state funding 25% of the contract and federal funds paying the remaining 75%. The second-year contract provides for training three groups of new hires and seven groups of existing employees. In addition, three two-day training sessions would be provided for area social work supervisors. OSS training coordinators have proposed new job titles and a career ladder for social workers in anticipation of approval of the second-year contract and the certification program. The proposed career ladder requires, as a minimum, a bachelor's degree in social work, sociology, psychology, counseling or child development for a social worker.

The second-year program would require a large investment of fiscal resources and time, but could be beneficial to the state's social service delivery system if its implementation is accompanied by other changes in the employee hiring and appraisal system (see pages 27 through 31). In addition, OSS could minimize the cost of the UT Certification Program by improving its initial selection procedure for employment. If OSS continues to hire persons with little experience or knowledge in social services, then it can expect a higher certification failure rate than if it hired persons with social service-related educational backgrounds. If the career ladder plan, with its higher entry-level requirements, is approved, this should improve the certification rate and save some of the training costs that would be lost when an employee cannot meet certification standards.

Employee Appraisal

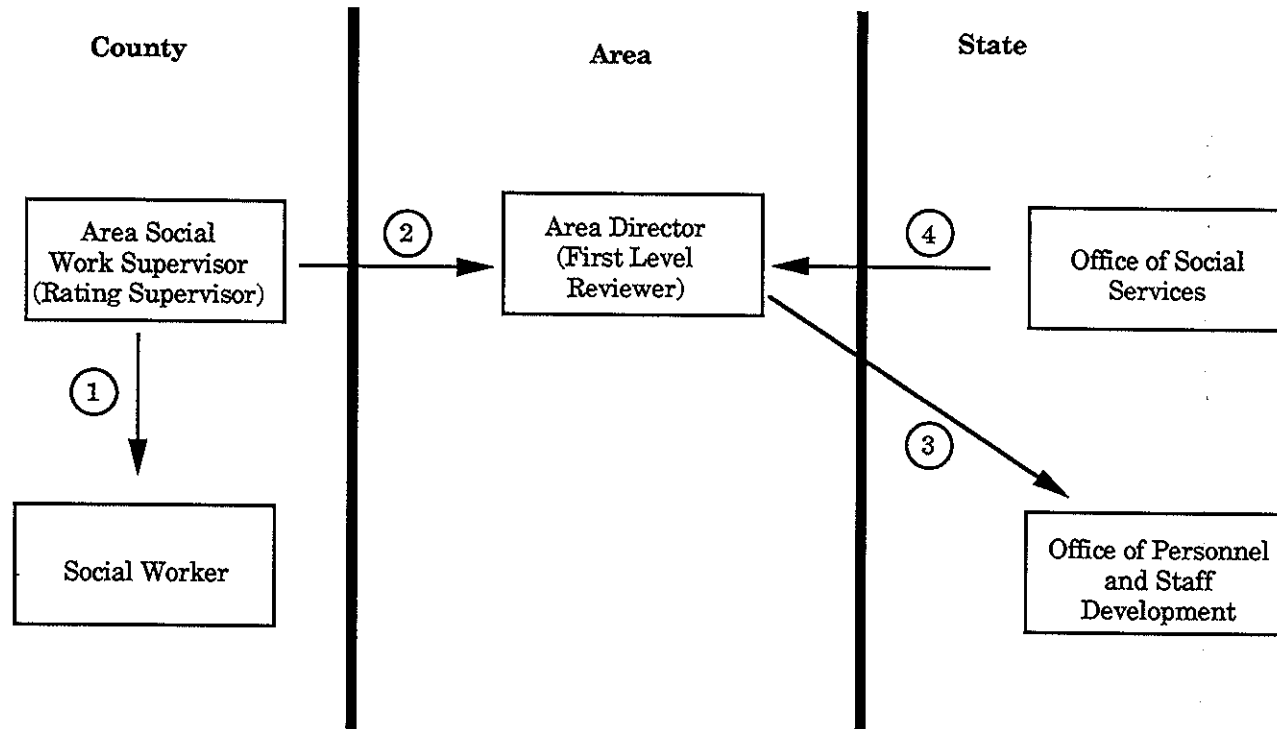
- *The Office of Social Services' area social work supervisors are inconsistent in conducting performance appraisals of social workers, thus compromising one important component of the quality assurance system.*

Department of Human Services policies require that a supervisor evaluate the work of an employee over an appraisal period and complete an appraisal report on the employee at the end of the period. An appraisal period may last from 90 to 365 days in length. Appraisals are to be conducted for new employees at the end of six months and then again at the end of their first twelve months of work, and are to be conducted on a yearly basis for all other employees. The area social work supervisor conducts the appraisal and forwards it to his/her area director for review. (See Exhibit 8, page 28.) The area director then forwards the appraisals to the Office of Personnel and Staff Development, where they are entered into the computer tracking system.

Current DHS policy permits area social work supervisors to conduct performance appraisals for intervals prior to the current performance

EXHIBIT 8

PERFORMANCE APPRAISAL PROCESS



- ① Area Social Work Supervisor places social worker in an appraisal period for at least 90 days, at the end of which the supervisor compares social worker's performance against written standards.
- ② Area Social Work Supervisor assigns employee a performance rating and forwards the appraisal to the Area Director for review.
- ③ Area Director reviews the appraisal rating, signs the appraisal form and forwards it to the Office of Personnel and Staff Development for identification of training needs and entry into the computer tracking system.
- ④ Office of Social Services reviews the operations and performance of Area Directors on a random basis.

SOURCE: PEER analysis of DHS policies and interviews with Office of Social Services personnel.

appraisal period merely for the purpose of "catching up." The system allows reports for a particular period to be entered into the system several months or even years later. In other words, an appraisal which should have been conducted two years ago can be submitted now. PEER does not accept the validity of this policy, because the likelihood of supervisors' accurate recall of the quality of social workers' performance diminishes with time.

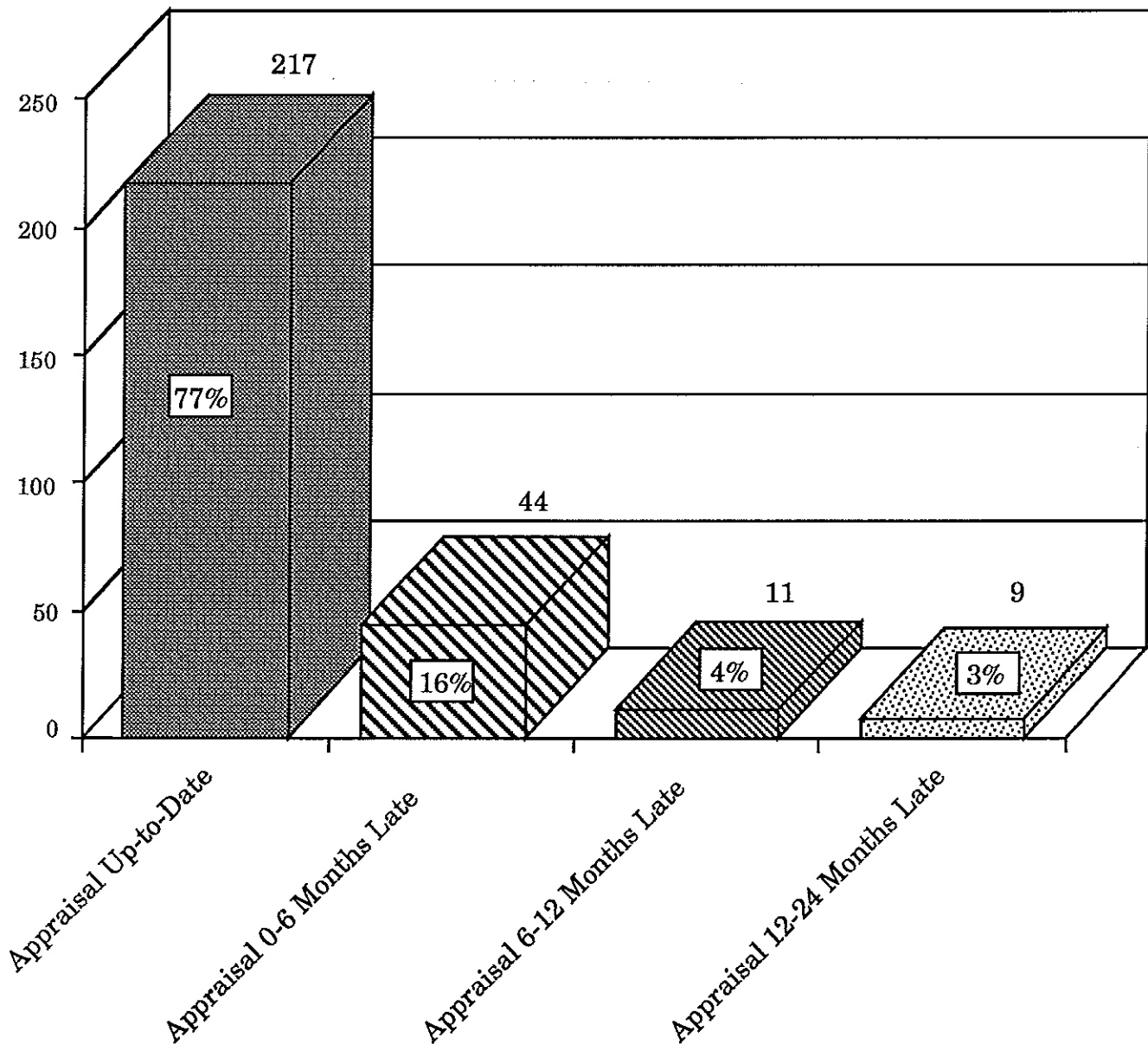
Related to DHS' attempts to "catch up" on performance appraisals, the Office of Personnel and Staff Development's computer tracking system does not provide the current status of performance evaluations. Only one appraisal rating per employee may be entered each month. If more than one appraisal is submitted at a time for the purpose of "catching up," the Office of Personnel and Staff Development must hold the later appraisals until the next month to be entered. Therefore, the date provided on the monthly printout as being that of the last performance appraisal for an employee may not be accurate. A more recent appraisal may be being held by Office of Personnel and Staff Development personnel to be entered into the computer.

PEER staff found that, as of April 12, 1992, twenty-three percent (23%) of performance appraisals for eligible social workers had not been conducted (see Exhibit 9, page 30). Some social workers have not had their work evaluated in almost three years. PEER found two employees in Hinds and Rankin counties who were hired in 1990, but have not had their first six months' appraisal. Because of data problems listed above, it is possible that DHS has conducted performance appraisals for some portion of the delinquent 23%, but did not enter the data on a timely manner. Recognizing that a problem existed in regards to performance appraisals, former DHS Executive Director Bea Branch, in a DHS memo issued to all division directors on October 9, 1991, required all DHS employees to be in a current appraisal period by November 30, 1991. Likewise, Interim DHS Director Sue Hathorn issued a memo on March 31, 1992, reminding all division directors to have their employees in a current appraisal period.

As discussed on page 51, PEER staff found that area social work supervisors do not conduct case reviews in a consistent and timely manner. Case reviews are the foundation of performance appraisals of social workers. Review of a social worker's case files presents the area social work supervisor with the most documentable evidence of that social worker's performance. The performance appraisal process should be tied very closely to case reviews. PEER staff contends that if area social work supervisors were reviewing social workers' case files in a timely and consistent manner, then the area social work supervisors would find it easier to conduct performance appraisals in a timely manner.

Performance appraisals serve many purposes, including providing systematic judgements to be used in making personnel decisions by supervisors and providing a means for the worker to know how his/her

EXHIBIT 9
STATUS OF PERFORMANCE APPRAISALS
OF ELIGIBLE SOCIAL WORKERS
AS OF APRIL 12, 1992



Total Eligible Social Workers = 281

NOTE: As of April 12, 1992, the Office of Social Services had 348 filled social worker positions. Only 281 of the 348 were eligible for appraisals. Eligible social workers are those who have been employed for more than six months.

SOURCE: PEER analysis of Department of Human Services, Office of Personnel and Staff Development documents

work is viewed by management. Thorough appraisal systems offer a plan for corrective action. Performance appraisals enable supervisors to determine if social workers possess the knowledge, skills and abilities needed in the delivery of social services. In not consistently administering performance appraisals, the Office of Social Services has no assurance that social workers are delivering social services to clients in a quality manner.

Recommendations

1. By September 1992, the Executive Director of the Department of Human Services should request the assistance of the State Personnel Board in identifying and validating minimum employment standards for direct service workers similar to those being developed by the OSS Training Division for social workers. These employment standards should require evidence of training in the knowledge and skills which give social workers the best chance of success on the job. The validated standards for hiring should be adopted for use as soon as the validation process is complete, with a goal of September 1993 of approving the standards for use by the DHS personnel department.
2. The Office of Social Services Training Coordinator should develop minimum training and competency requirements to be incorporated into a formal social worker training program by November 1, 1992. These requirements should be content-valid and provide the maximum opportunity for employees to learn or demonstrate the knowledge and skills needed in the practice of social work. The Training Coordinator should obtain approval from both the Office of Personnel and Staff Development and the Executive Director of DHS for implementation of the requirements by January 1, 1993.
3. The Office of Social Services Training Coordinator should develop and implement by October 1, 1992, a monitoring system to track individual employee training activities and goals. The system should be automated as quickly as resources can be identified and reallocated. (See recommendation 2, page 48.)
4. All area social work supervisors should immediately begin to conduct and document performance appraisals as required by DHS administrative policy AP-12.
5. Working with the Office of Personnel and Staff Development, area directors and the Director of the Office of Social Services should propose any needed revisions to the current performance appraisal monitoring system. These revisions should provide management with the timely and accurate information needed to identify and remediate problems at staff and supervisory levels. Proposals for revisions should be submitted for approval by the Executive Director by December 1, 1992. The Director of the Office of Personnel and Staff Development should

make approved revisions to the automated tracking system to insure accurate management information for use by field-level supervisory staff. Approved revisions to the system should be completed as quickly as resources can be identified and reallocated (see recommendations on pages 48 through 50.)

Adequacy of Staff Resources

Twenty-six of the state's eighty-four service areas have turnover rates greater than 25%.

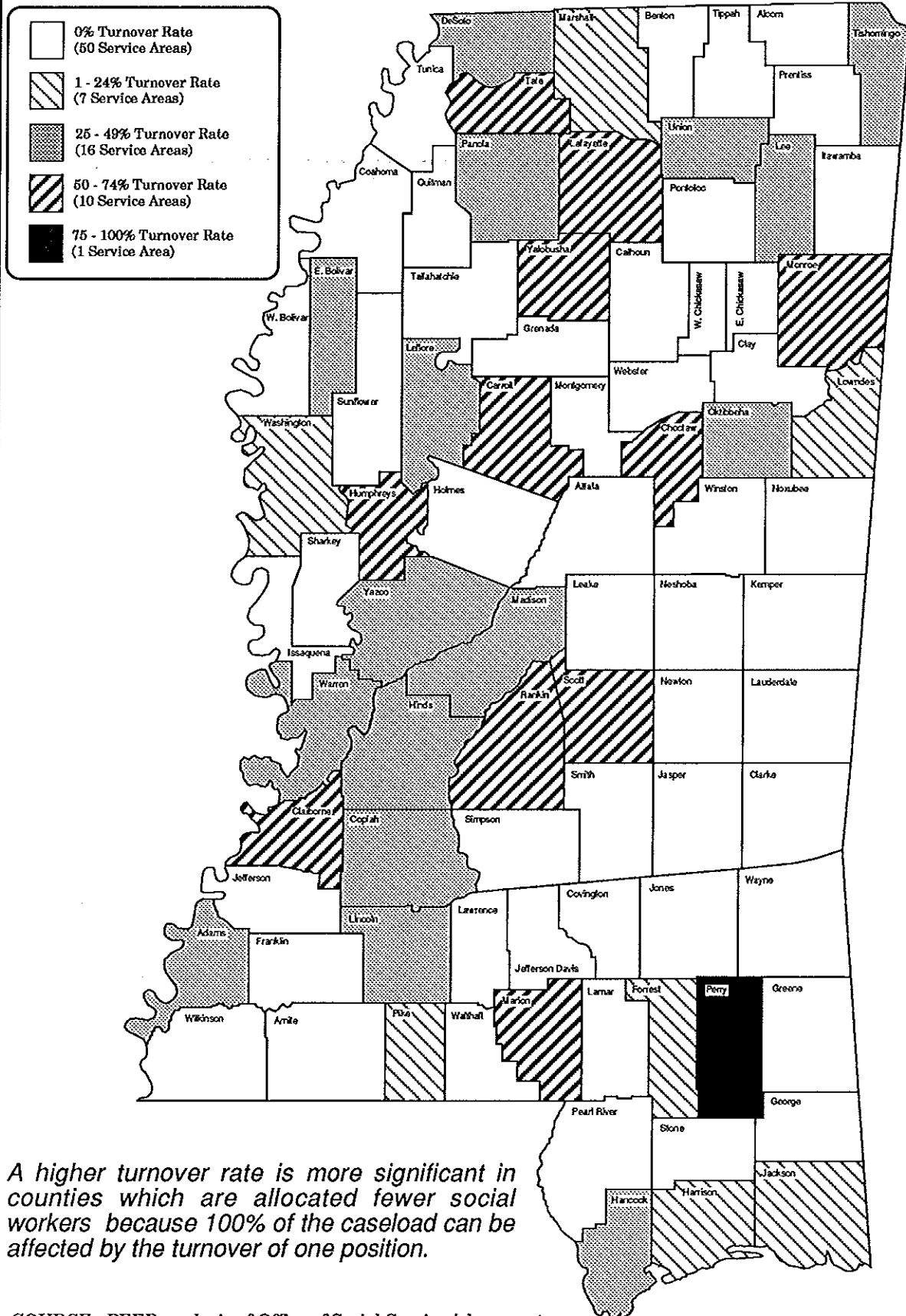
As of April 2, 1992, the Office of Social Services had 348 allocated social worker positions. Forty of these allocated positions, or 11%, were vacant at that time. In addition, the Office of Social Services operated with a turnover rate of 18% from April 1991 to April 1992 (see Exhibit 10, page 33). That is, 18% of all social worker positions experienced changes in personnel during this period. Such turnover does not contribute to consistent implementation of policy nor does it lend itself to insuring a sufficient number of employees to provide adequate social services to Mississippi's needy clients.

PEER interviews with OSS management personnel and social workers affirmed that turnover can often be attributed to the stress associated with the working environment accompanying social work. OSS does not currently have a stress management program to address the needs of its social workers. Many personnel stated that stress is further complicated in geographic areas where few opportunities exist for other employment and workers feel that they must continue on the job even under highly stressful conditions.

Counties with large urban areas experience high turnover rates more consistently than rural counties. This has often been attributed to the fact that social workers in urban areas tend to face higher caseloads and a wider variety of high pressure problems. While this may be partly true, greater opportunities to find alternate employment may also contribute to the turnover problem in urban areas. Stating that turnover problems tend to be greater in urban counties is not to suggest that it does not pose a problem for rural counties. Even though it does not occur as often, turnover in rural counties that are allocated one or two social workers seriously affects day to day operations in those counties because 100% of the caseload can be affected by the turnover of the position. Appendix B, page 75, provides a summary of personnel by county.

Social workers have not been the only personnel to experience turnover. Within the last eighteen months, the Division of Family and Children's Services has operated under three different directors. The last director, Jane Emling, who was also serving as temporary director of the Office of Social Services, was terminated without notice and for no stated

EXHIBIT 10 TURNOVER RATES OF SOCIAL SERVICE AREAS APRIL 1991 - APRIL 1992



A higher turnover rate is more significant in counties which are allocated fewer social workers because 100% of the caseload can be affected by the turnover of one position.

SOURCE: PEER analysis of Office of Social Services' documents.

reason by the executive director on May 8, 1992. This now leaves the division and the office in a period of transition. Workers look to management to provide stability and direction. Turnover in management, especially when no reason is given, can lend itself to lower worker morale and productivity.

The Office of Social Services has not collected the information it needs to determine accurately how many social workers are needed to deliver the desired level of social services to all clients.

The Office of Social Services has a workable system for distributing available social worker resources among the counties, although that system is flawed by OSS's use of outdated workload standards. A system for determining resource needs should go beyond the distribution of existing resources, however. Such a system should provide department managers with information on workload trends over multiple years and should assist the Legislature and department managers in determining total resources needed to deliver all necessary services.

Determination of Social Workers Needed Statewide and by County

To determine social worker resource needs accurately, an agency such as OSS would have to measure workload (cases by type); designate overall service goals and a service delivery model; and determine staff time needed to provide the desired level of services for each case type. (See Exhibit 11, page 35.)

OSS measures workload on a monthly basis and, at least informally, has designated overall service goals and preferred delivery models. DHS also has a system for collecting data on the amount of time currently spent by social workers in delivering each type of service, as well as a system for distributing social worker positions among the counties based on workload and corresponding resource needs. However, OSS has not determined how much staff time *should* be spent on each type of service. In addition, OSS has been using five-year-old data on average hours per case, which may result in outdated staffing patterns in some counties.

*Lack of information on social worker resource needs--*OSS uses its workload data (number of cases receiving each type of service in each county) solely to determine how existing social worker resources should be allocated among the counties. This worker allocation process is necessary to ensure that available workers are placed where they are most needed. However, the department's practice of limiting its analysis of resource needs to the distribution of existing resources is comparable to purchasing one box of provisions to last for a week and distributing the provisions

EXHIBIT 11

**RELATION BETWEEN GOAL, SERVICE MODEL
AND SOCIAL WORKERS NEEDED**

SCENARIO	OVERALL SERVICE GOAL	SERVICE MODEL	SOCIAL WORKERS NEEDED
1. Accomplish whatever is possible using existing resources	Attempt to retain the child in or return the child to the home; use foster care extensively	Low level of client contact (less than one hour per case per month for some cases)	348 social workers (FY 1992 level)
2. Accomplish whatever is possible using limited additional resources	Attempt to retain the child in or return the child to the home; use foster care often	Minimal casework (at least one hour per case per month)	No estimate based on time studies; DHS has estimated it would need 23 additional social workers and 347 additional support positions (e.g., social work aides, clerk typists)
3. Work toward preferred objective	Retain the child in or return the child to the home; place little dependence on foster care	Family-centered case work	No estimate based on time studies (PEER estimated that a 92% increase in social worker positions would be needed under Child Welfare League of America guidelines)

SOURCE: PEER analysis of DHS documents and interviews.

equitably among the members of a group. The purchase and distribution of provisions is not based on an assessment of the minimum calories needed for the entire group to survive for one week, nor is it based on a higher standard, such as optimum nutritional intake of all group members. It is simply an allocation of available resources. Similarly, OSS uses its workload reporting system for distributing existing social worker resources, but it does not have a system for determining the adequacy of current resources. The department has not collected the information it needs to determine the staffing levels that would enable it to deliver services as effectively and efficiently as possible.

OSS has said it intends to provide family-centered casework services that would support retention of the child in the home or the return of the child to the home. A first step to accomplishing the objective of creating safe family environments would be to determine what social work resources are needed per case. On average, how many hours of case work are needed to ensure a safe family environment or to meet some other standard for each child in each service area? How many families must receive these services? How many social workers are needed to provide the required number of hours of service to all families needing these services?

Exhibit 11, page 35, shows the relation between the goal, the preferred method for delivering services and corresponding social worker positions needed. As that exhibit shows, under the current system (Scenario 1) OSS attempts to retain the child in the home, but PEER found anecdotal evidence that social workers have minimal contact with some families needing services. OSS has estimated that it would need 23 additional social workers to meet its current service requirements, which include providing at least one hour of service per case per month. OSS officials said they also would need approximately 347 additional support positions to relieve social workers of some paperwork and other tasks.

The FY 1993 appropriation for the Department of Human Services includes 23 additional social worker positions and 89 support positions (clerk typists, social worker aides and parent aides). According to DHS's supplemental FY 1993 budget request, this additional staffing would be a first step toward reaching the staffing levels the agency needs in order to provide exemplary social services.

OSS has said it intends to provide family-centered casework, but the department has not determined how many social worker hours are needed to ensure a safe family environment or to meet some other standard for each child in each service area. Lacking this information, OSS has not determined how many social workers are needed to provide the desired casework service to all families needing these services.

To arrive at a preliminary estimate of the social worker positions needed to achieve its service objective, OSS could apply Child Welfare League of America (CWLA) caseload/workload standards to the caseload in

each county. However, CWLA recommends using its standards only as a guide; that organization encourages agencies to determine their own optimum caseload per social worker in each service category "*through careful time studies carried on within the individual agency. . . based on the responsibilities assigned to complete a specific set of tasks, or units of work, for which the worker is responsible.*" (See Appendix C, page 77, for CWLA-recommended caseload/workload standards.) PEER determined that, using standards suggested by CWLA for delivering services under the the family-centered case work model preferred by OSS, Mississippi would have to increase its social worker staffing by 92%. OSS has not conducted the time studies needed to validate staffing needs at this or any other level.

*Use of outdated averages instead of research-based standards--*OSS should base its determination of social work resource needs on a formal study of the time needed to perform the services needed to reach the desired service goals. The method OSS currently uses on an annual basis to distribute social worker positions among the counties is flawed by its dependence on an outdated study of the average social worker time spent per case for each service offered (adoption, placement, etc.). The method also is flawed by OSS's lack of research-based standards on the time needed to achieve certain service goals. The data currently used by OSS reveals only how OSS social workers spend the time available to them, not whether too little or too much social worker time is available.

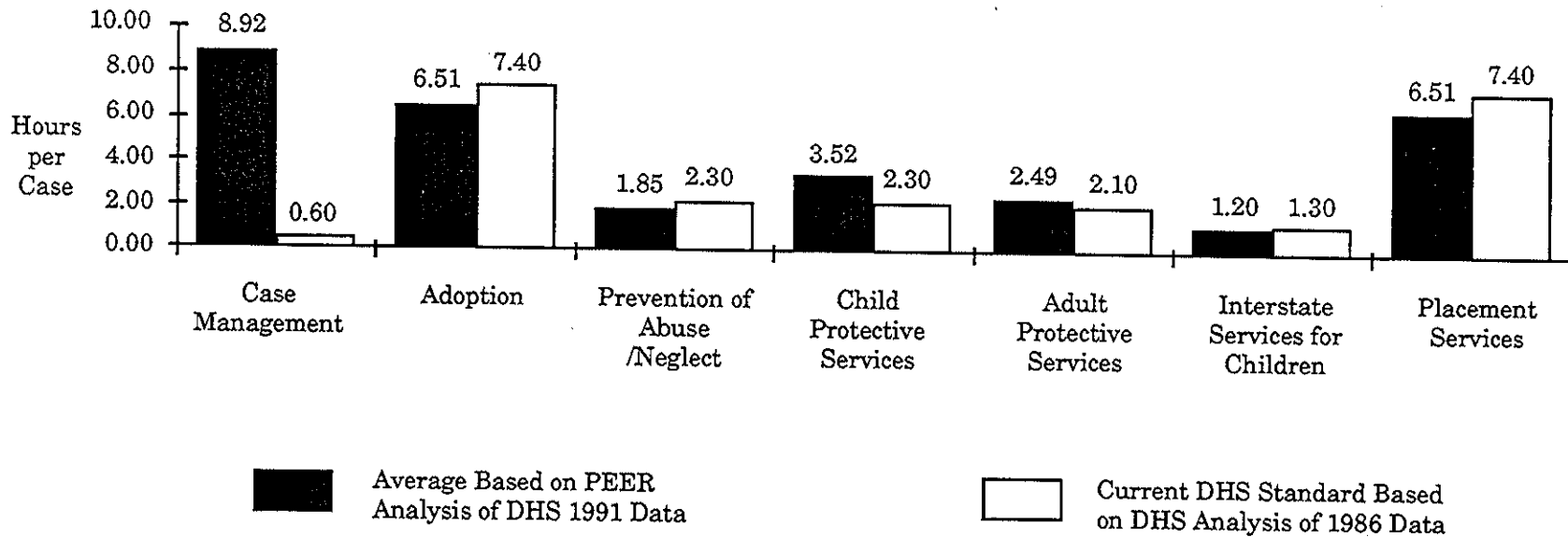
OSS uses the results of a 1986 study of the average social worker time spent per case in each service activity (adoption, placement, etc.) to allocate the state's social worker positions. OSS personnel refer to these 1986 averages as "standards" and use them to determine the number of social workers needed to handle the reported cases in each county. Although DHS has routinely collected data on social workers' use of time on a quarterly basis for several years, in recent years DHS has used that data for an unrelated purpose (allocation of costs for computing federal reimbursement obligations). An OSS administrator told PEER staff the department intends to update its 1986 standards, but it has not yet done so.

PEER's analysis of this 1991 data on social workers' use of time showed that social workers' 1991 hours per case in several service activities differ markedly from the averages OSS computed in 1986. (See Exhibit 12, page 38.) When the 1991 data are used as a basis for allocating the department's 348 social worker positions, 14 county offices can be seen to have 1 to 4 more social workers than the updated averages would yield and 12 others have 1 to 3 fewer than the more recent data would support.

The proportion of time that social workers reported that they used in providing case management services concerned the OSS administrator who reviewed PEER's analysis of OSS time study and workload data. PEER's analysis of OSS 1991 time study data shows that social workers spent approximately 4.4% of their service time per month on case management

EXHIBIT 12

AVERAGE 1991 SOCIAL WORKER HOURS PER CASE AND DEPARTMENT OF HUMAN SERVICES STANDARD HOURS PER CASE, BY SERVICE



SOURCES: 1991 Averages: PEER Analysis of 1991 DHS Time and Workload Study Data; DHS Workload Standards: Listed on DHS County Workload Summary, Form DHS-SS-449A (Rev. 3-01-90).

services, whose recipients made up only 1.7% of the client workload. This allocation of time resulted in an average of 8.92 hours per case per month in the case management service area. The 1991 average (8.92 hours) is considerably higher than the 1986 average of 0.6 hours per case. The OSS administrator who reviewed PEER's analysis told PEER staff that he was concerned about the 1991 ratio because case management activities include the more traditional in-office counseling tasks to which OSS no longer assigns priority. He said OSS uses the case management designation to describe services that are not typically associated with that term. For this reason, the unexpectedly high ratio of time per case in this category may be attributable to some social workers' inappropriate use of this category to report service time that actually may have been spent on higher-priority tasks. Alternatively, the extensive time per case in the case management service area may be explained by the fact that social workers in certain counties may spend too much of their time on low-priority case management activities. The latter hypothesis is supported by the fact that in six counties more than 10% of all cases were in the low-priority case management service area.

This inconsistency between actual data on social workers' use of time and OSS service priorities illustrates a problem that can arise as a result of the department's practice of basing assignment of resources on average hours per case instead of on the minimum time or proportion of time necessary to perform the desired, high-priority activities. The effect of this practice can be the allocation of too many resources to counties delivering lower-priority, resource-consuming services. PEER's application of the higher case management time standard (1991 average) to county workload resulted in dramatic hypothetical increases for counties with high proportions of cases in this service area. For example, one county reported an average of 37 (72%) of its 51 cases per month as case management cases. That county would be allocated 300% more social workers if the updated averages formed the basis for reallocating the state's social worker resources.

Because OSS continues to use 1986 average time per case rather than 1991 averages for allocating social workers, OSS has avoided "rewarding" counties for delivering low-priority case management services through assignment of higher social worker resource allocations to these counties. However, the case management example illustrates the problems that can occur when OSS bases its workload standards on social workers' current use of time instead of on a formal study of the time needed to perform properly the services that OSS considers most important.

Lack of Comparable Data on Long-term Caseloads by Service Area

In addition to flaws in its system for using data on each county's caseload and the hours needed per case to establish social worker resource

requirements, the department's caseload data itself is of limited use because case counts are not comparable from year to year. OSS and the Legislature need accurate information on case trends if they are to anticipate shifts in resource needs, but OSS data bases do not provide consistent information to permit tracking of caseload trends. Exhibits 13 and 14, pages 41 and 42, illustrate the problems encountered in attempting to interpret the available data.

OSS collects data monthly on number of cases by service area (adoption, foster care, etc.) by county. (See Exhibit 13, page 41.) However, OSS personnel explained that fluctuations in this data reflect shifts in department policy regarding the definition of a case instead of reflecting changes in the volume of work to be performed by social workers.

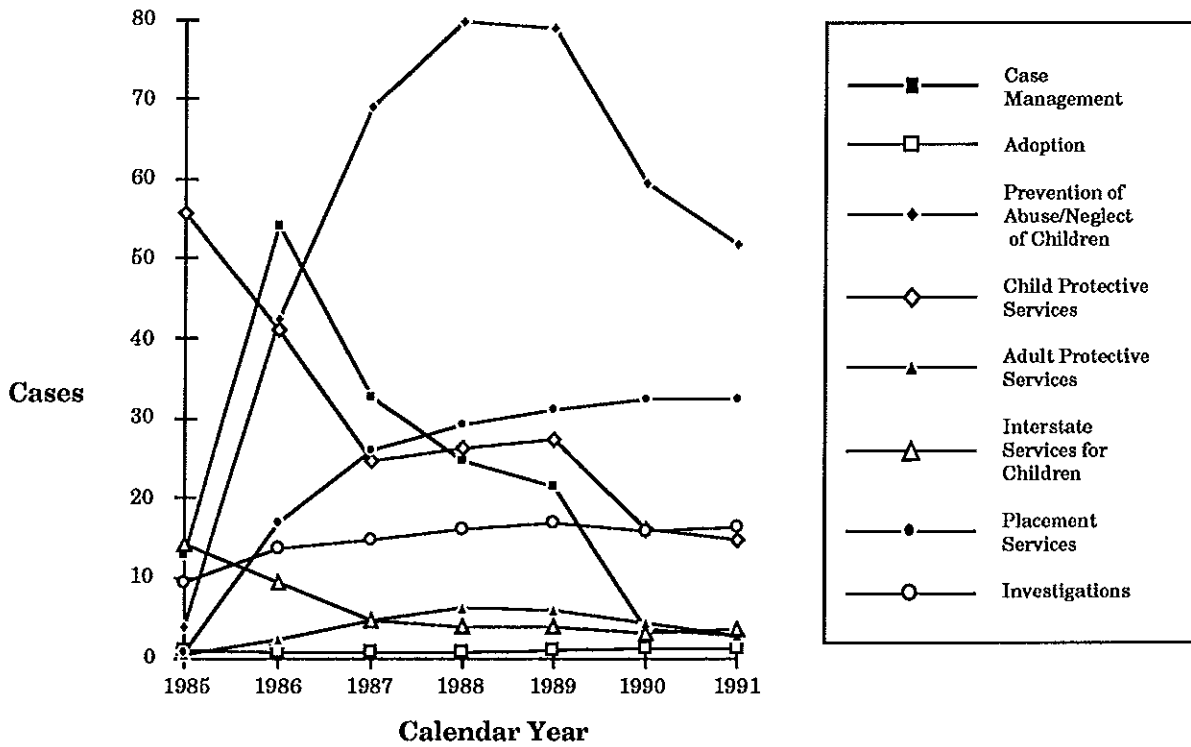
For example, an OSS official explained the increase in the number of cases from 1985 through 1988 (see Exhibit 14, page 42) by citing the executive director's expectation at that time that a case file be opened for virtually any incident. During that director's tenure OSS had a high number of open cases, some of which were not active. In other words, a case file had been established, but no services were being provided. The decline in cases from 1989 through 1991 occurred when the department, under a different director, closed these inactive cases (cases where no service activity was required) and established a policy that cases should be closed if the case plan has been completed and services no longer appear to be necessary. Also during the period from 1989 through 1991, OSS changed the definition of a "case" from an individual child to the entire group involved (usually a family). For both these reasons, the apparent increase in cases from 1985-1988 and the apparent decline in cases from 1989 through 1991 should not be seen as changes in the volume of work or the number of clients served. Rather, they should be viewed as reflections of shifts in department policy on case files and reporting.

Although it is the department's prerogative to change its policies on case definitions, implementing these shifts without collecting the necessary data for developing conversion ratios imposes severe limits on the data's usefulness to the department and the Legislature in discerning actual trends in the volume of work to be accomplished. Trends in the number of substantiated cases of abuse and neglect (Exhibits 15 and 16, pages 43 and 44), a type of data that is not affected by the policy shifts described above, provide some indication of relative stability in the number of new cases entering the system from 1989 through 1991. Without comparable data on case closures, however, it is impossible to determine from this information whether the total caseload has increased or decreased over that period.

Lack of comparable data on cases in each service area over time precludes any determination of the service areas most affected by changes in substantiated abuse and neglect. As a result, OSS managers and the Legislature lack the information they need to determine whether additional resource needs can be expected in the future in the area of child protective

EXHIBIT 13

**AVERAGE SOCIAL SERVICE CASES AND INVESTIGATIONS
PER MONTH PER COUNTY, BY SERVICE
CALENDAR YEARS
1985-1991**

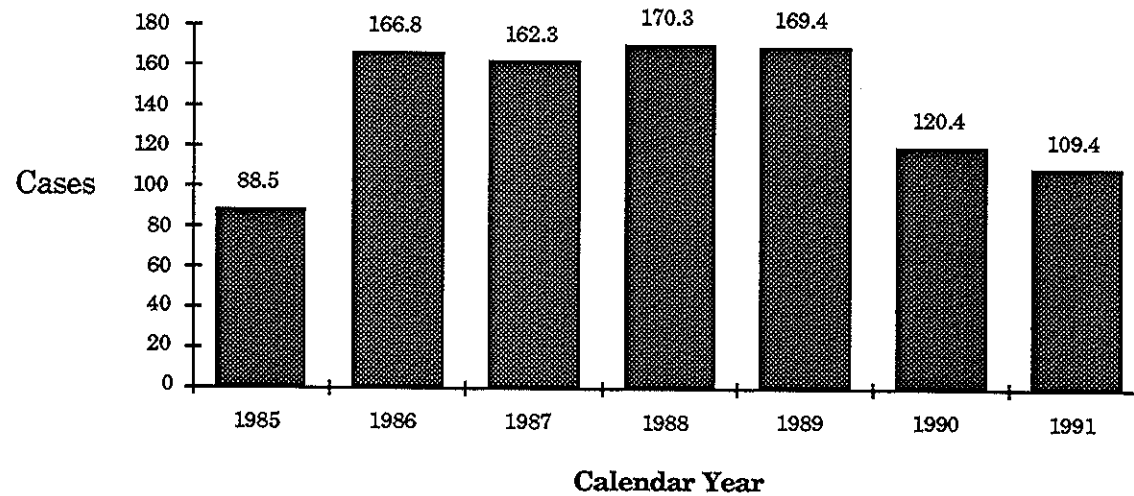


OSS personnel told PEER staff that fluctuations in the number of cases by service area reflect shifts in department policy regarding the definition of a case and criteria for opening a file, not significant changes in the volume of work to be performed by social workers.

SOURCE: PEER analysis of DHS workload Data.

EXHIBIT 14

AVERAGE SOCIAL SERVICE CASES PER
MONTH PER COUNTY, ALL SERVICES,
CALENDAR YEARS 1985-1991

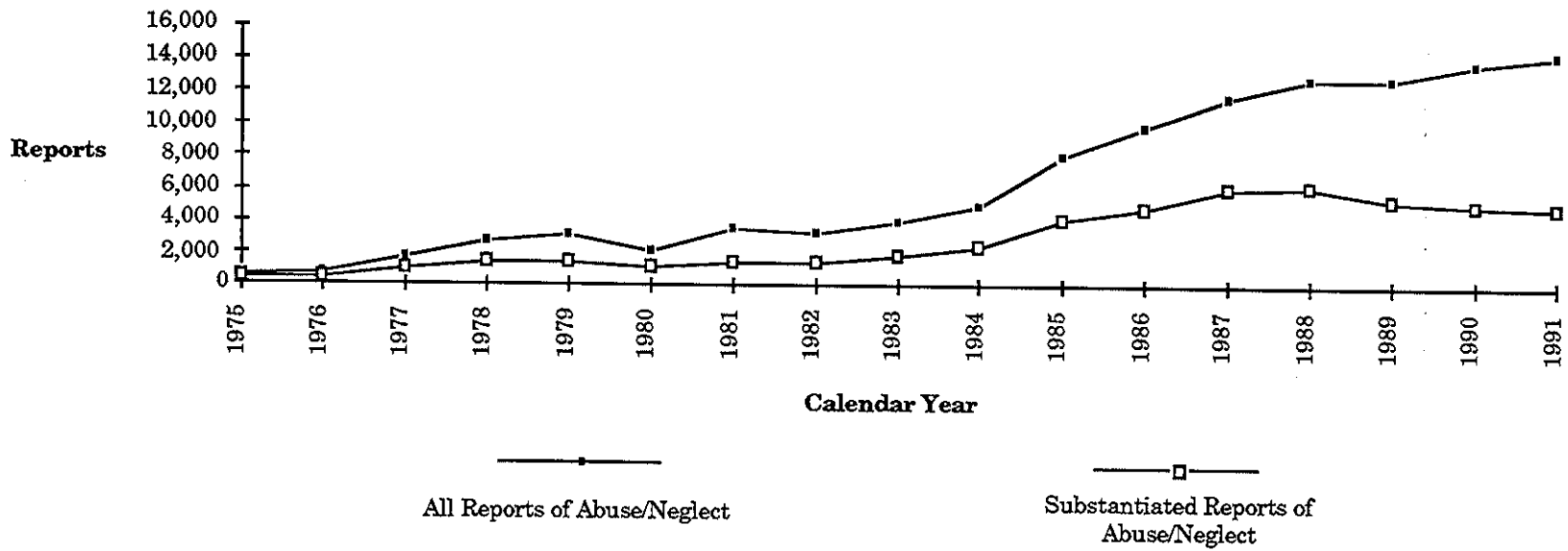


OSS personnel told PEER staff that fluctuations in the number of cases reflect shifts in department policy regarding the definition of a case and criteria for opening a file, not significant changes in the volume of work to be performed by social workers.

SOURCE: PEER analysis of DHS workload data.

EXHIBIT 15

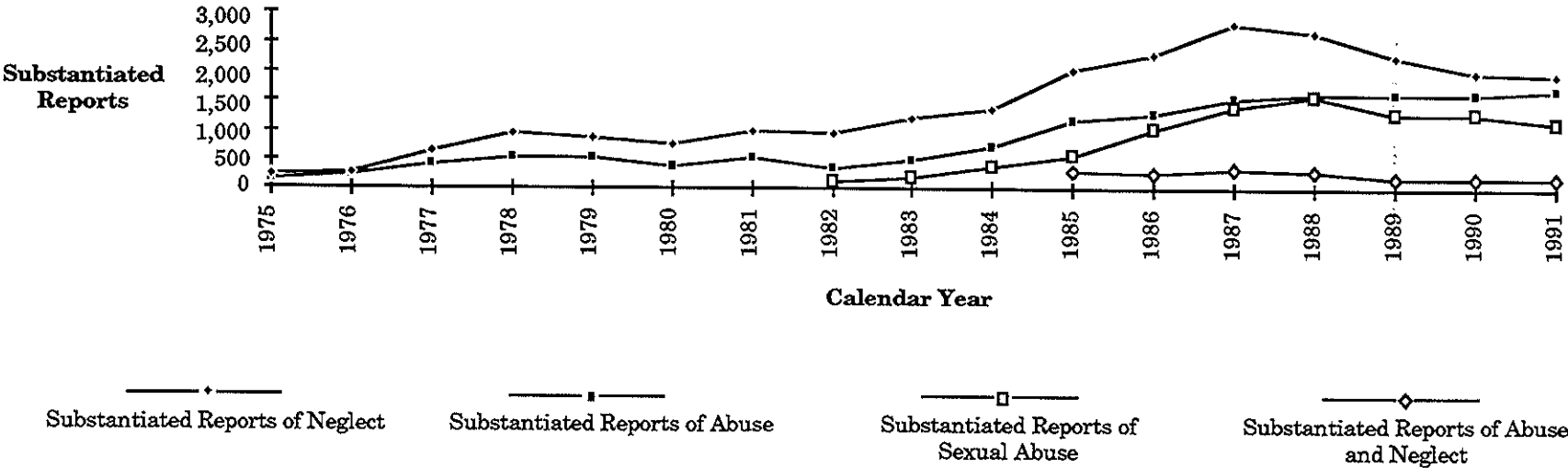
**REPORTS OF ABUSE AND/OR NEGLECT IN MISSISSIPPI, 1975-1991:
TOTAL REPORTS AND NUMBER SUBSTANTIATED**



SOURCE: PEER analysis of DHS data.

EXHIBIT 16

SUBSTANTIATED REPORTS OF ABUSE AND/OR NEGLECT IN MISSISSIPPI, 1975-1991, BY TYPE



SOURCE: PEER analysis of DHS data.

services, for example, rather than adoption services, or in the area of residential treatment services rather than foster home placement.

Recommendations

1. The Director of the Office of Social Services should work with the Training Coordinator to design and implement stress management training in order to reduce the stress and burnout that lead to high turnover rates. A training curriculum addressing stress and burnout should be completed in time to be included in the in-service training sequence currently being proposed by the Office of Social Services.
2. The Executive Director should work closely with the State Personnel Officer to insure that communication between the agencies is clear and that direct service vacancies are appropriately filled in the shortest time possible. Both executives should designate one staff member each to monitor DHS personnel requests for timeliness over the next year. These two staff members should make quarterly reports to their respective directors and the results of this one-year monitoring procedure should result in recommendations for improving the response rates for filling direct service vacancies.
3. The Director of the Office of Social Services should immediately appoint a task force, composed of the directors of OSS's Administration, Protection and Placement Units and the six area directors, to:
 - identify objectives and standards for each case type (see recommendations, page 52);
 - determine the average time needed per case to meet those objectives and standards;
 - determine the maximum number of cases by type that a social worker can carry on average if service objectives are to be accomplished;
 - determine current and projected workload by case type; and,
 - apply caseload ratios to current and projected workload to arrive at resource needs.

The Executive Director of DHS should approve the task force's final report and provide it to the chairpersons of the House and Senate Appropriations and Health and Welfare Committees by September 1, 1993. The report should identify needed resources for improving OSS's service system and should provide a cost analysis, a timetable and funding priorities for implementation.

4. Effective immediately, when changing definitions of categories of workload or other data, the Director of the Division of Family and Children's Services should require that the data be collected under the old and new definitions for one or more reporting periods to permit accurate conversion from one format to another. This will provide a basis for continuing to use historical data in projecting future workload and resource needs.
5. If the Division of Family and Children's Services continues to use average time spent by social workers per case as a basis for allocating resources, the Director of the Administration Unit should immediately review current procedures for determining social workers' workloads and use of time to ensure that the two studies use comparable case type/activity definitions. The Director of the Administration Unit, working with the training coordinator, should develop a curriculum to insure that social workers utilize data collection instruments correctly. Such training should be completed by March 31, 1993.
6. The Director of the Division of Family and Children's Services should immediately formulate and clearly communicate through the area directors the division's service priorities. The Director of the Administration Unit should be assigned to monitor the effectiveness of this communication of priorities by determining the extent to which social workers spend time on high-priority activities. The results of such monitoring and follow-up reviews should be reported to the division director on a monthly basis. In addition, such monitoring should be used to help the division identify counties in which demand for high-priority services may be relatively low, permitting the division to shift social worker resources to counties experiencing greater demand for high-priority services.

Management Information

Department of Human Services management has failed to bring the Mississippi Social Services Information System (MSSIS) to its fullest operating potential as a support resource for front-line case management or for division management.

As originally conceived, the Mississippi Social Services Information System (MSSIS) was to be a recording and reporting system through which state and local staff could share service data for administrative management and accountability purposes. It was to use a computerized central file into which staff could enter data on service plans, service activities, and information about cases and individuals. The data in the central file was to be used to produce reports utilized by administrators, supervisors, and service delivery staff in the performance of job responsibilities. The system was originally designed in the mid-1970s to meet federal Title XX reporting requirements and did not contain abuse

and neglect or foster care information. It now contains those elements of information.

However, rather than becoming a full-service management information system, MSSIS has come to be used for two primary purposes: to maintain a central registry of individuals involved in abuse and neglect cases, and to maintain a list of children in custody, as required by PL 96-272. Public Law 96-272 specifies that the department shall maintain an inventory of children placed in its custody and review each child's case plan every six months. While these are important functions, they do not represent a significant use of the data collected to improve service accountability in the state. The fact that MSSIS is also used for Social Services Block Grant reporting and to answer general questions about the number and type of cases served by the social service system also does little to justify its existence as a management information tool. As currently implemented, the MSSIS system produces information on a *post hoc* basis with little direct utility for workers in the field.

In addition to lacking practical applications, MSSIS does not contain all the necessary elements to report on children by the specific type of custody required in MISS. CODE ANN. Section 43-15-15. OSS has failed to follow this law, dating from 1978, which requires the classification of children as follows:

- Temporary custody for evaluation, not to exceed three months;
- Temporary custody not to exceed one year with the plan to return custody to the natural parents;
- Temporary custody, not to exceed two years, with a plan to free for adoption;
- Children freed for adoption;
- Children ages fourteen and above who have voluntarily chosen not to be adopted and cannot be returned to their own homes; and,
- Children who are institutionalized and for whom placement in an adoptive home is not feasible.

This information would provide management with the percentages of total children in custody who are expected to be cared for short-term and those in whom the state will have to invest more heavily because of more severe family and/or emotional problems. If OSS utilized its management information system to determine the amount spent on treatment and care of the various types of children, OSS could then project the financial resources needed in future years to care for children. OSS management and the Legislature could use this information to make budget requests and appropriations decisions.

PEER also found that information generated from the MSSIS information system is not always accurate. For instance, an MSSIS report stated that 2,660 children were in custody at January 1, 1992, versus 2,830 according to a manual workload data report compiled as of the preceding day. OSS officials consider the 2,830 figure generated from the manual report, which differs from the MSSIS report by 170 children, to be more accurate. (See Note 1 of Exhibit 17, page 49.) Retrieving information from the MSSIS system is also cumbersome. PEER did not receive a report on the living arrangements of children in state custody until six weeks after it was requested.

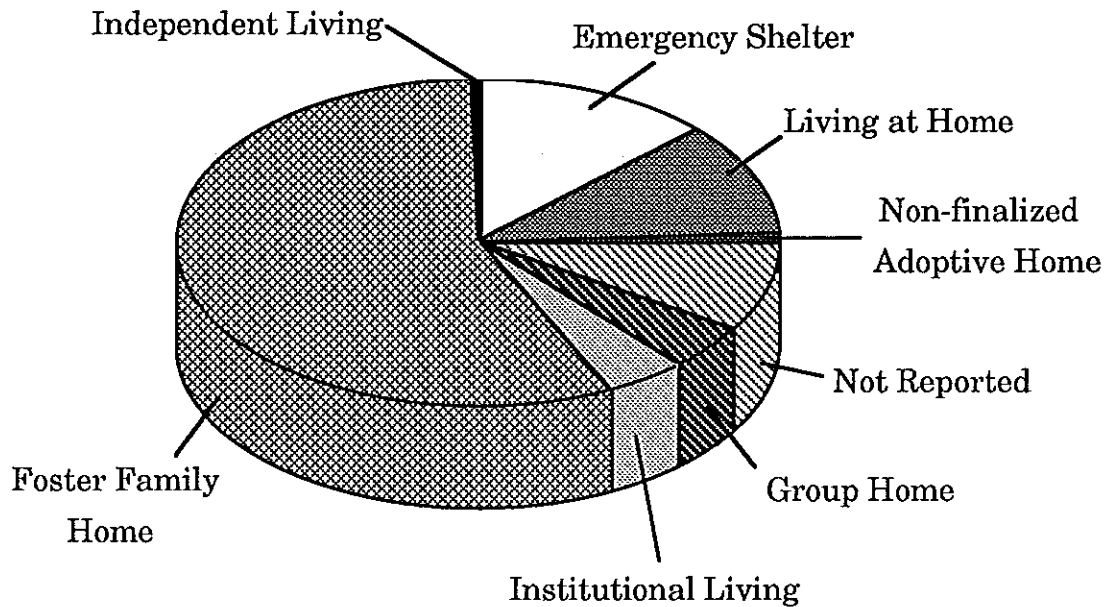
If the MSSIS system were operating at its fullest potential, it would have field level utility as well as additional utility for producing relevant and timely management information. With a fully developed on-line data system, area directors and area social work supervisors would have the data elements needed for timeliness checks and for ongoing quality assurance checks that include a timeliness component.









Recommendations

1. The Director of the Office of Social Services should immediately assign staff to review the reporting requirements of MISS. CODE ANN. Section 43-15-5 and develop a compliance plan to be implemented as soon as possible. The compliance plan should include a timetable for implementation of any changes in reporting procedure required to comply fully with the requirements of CODE Section 43-15-5.
2. The Executive Director of DHS should immediately appoint a task force from the Division of Family and Children's Services and the Division of Management Information Systems to review and assess the management information needs of the Office of Social Services. By January 1, 1993, the task force should provide the Executive Director with a complete report on:
 - types and forms of data currently collected;
 - areas of duplication;
 - data elements needed for timeliness and quality assurance checks;
 - hardware and software systems utilized;
 - systems for insuring data accuracy;
 - current report capability of each system,

EXHIBIT 17

**LIVING ARRANGEMENTS OF CHILDREN IN STATE CUSTODY
AS OF 1/1/92**



	Emergency Shelter	364
	Living at Home (A)	324
	Non-finalized Adoptive Home (B)	32
	Not Reported (C)	247
	Group Home	132
	Institutional Living (D)	113
	Foster Family Home	1,608
	Independent Living (E)	10

	Total Children in Custody	2,830
		====

Note:

(A) Living at Home--Children are living with parents or relatives. Many of these children are under care of the state by court order.

(B) Non-Finalized Adoptive Home--Children are living with parents who have agreed to adopt and are awaiting finalization of adoption.

(C) Not Reported--Living arrangements of these children have not been reported into the information system.

(D) Institutional Living--Children are in residential treatment, therapeutic care, or other institutional living.

(E) Independent Living--With federal grant funds, older adolescents are taught skills to work toward independence subsequent to the foster care program.

SOURCE: Office of Social Services records.

- costs of system operation; and,
- a proposal for the streamlining and reallocation of resources to achieve full implementation of a useful management information system.

Quality Assurance

Assessment of Timeliness

Although division policy defines critical time and contact requirements for documenting investigations and cases, the Division of Family and Children's Services is inconsistent in its compliance with these requirements, thus bringing into question social workers' timely response to children at risk.

*Investigations--*A major concern arising from the PEER hearing on the performance of the Division of Family and Children's Services was the question of whether investigations of reported child abuse and neglect are conducted in a timely manner. If not, children are placed in a position of prolonged risk and there is a presumed increase in the likelihood that the abuser will not be apprehended or prosecuted.

While PEER cannot categorically state that there is a problem with the timeliness of investigations in all areas of the state, there is sufficient anecdotal evidence that failure to provide a timely response to complaints does occur. However, *it is not a major problem in all service areas or with the majority of workers in the state.* Nonetheless, division officials freely admit that among the common problems found in periodic reviews of case file samples is the problem of investigations not being initiated on a timely basis. Failure of division officials to maintain a record of sampling methods and review outcomes limited PEER's ability to quantify the dimensions of the problem through existing review processes.

Independent verification of the extent to which timeliness of investigations is a problem depends on an analysis of documents contained in case files. Since these records are maintained in individual offices throughout the state, PEER decided to forego a scientific verification of timeliness as a problem in favor of a more purposive review process. Division policy has been established defining critical time and contact requirements and individual social workers are, by policy, required to maintain auditable records of compliance. PEER's review of a sample of case files reveals inconsistency in compliance with documentation requirements. Because of this, coupled with state-level admission that failure to comply with timeliness requirements does occur, PEER concludes that division officials should review and improve the existing quality assurance system.

While a timely response and proper documentation of contact is the responsibility of the individual social worker, quality assurance relative to these matters is the purview of the area social work supervisor and the area director. If these individuals perform their duties as assigned, problems with timeliness will be quickly identified and corrected. While some supervisory personnel have obviously understood policy and have developed a system for tracking timeliness and other quality assurance standards, others are much less precise and have allowed factors such as the volume of complaints to affect their quality assurance reviews.

Most tracking systems are manual and require extensive hands-on effort. In areas with a low volume of incoming complaints or relatively manageable workload requirements, this is not a significant problem. However, in high-volume offices, tracking timeliness and other quality assurance issues with a manual system proves to be quite difficult and, at times, unreliable. For example, in Hinds County, a "point in time" review of case records by division personnel revealed 145 investigation forms which had not been properly completed and timely and appropriate action had not been taken. A similar, though not as dramatic, problem existed with continuing contacts and case plans. The volume of cases made manual tracking difficult, though not impossible, and, as a result, required actions were lost in the "paperwork shuffle."

Visitation of Children in Custody--In response to concerns that social workers do not visit children regularly, PEER interviewed selected social workers in the Hinds/Rankin area about their visitation routines. Some social workers stated they did not have time to visit their children monthly and were concerned that their caseloads were too high to allow them to do so.

DHS internal policy states that foster care children must be visited once every month. According to DHS and Child Welfare League of America standards for family-centered casework, DHS may not have enough social workers to provide the services and accomplish the objectives it has established. (See page 36.) This understaffing may make it difficult for social workers to fulfill the requirements of their jobs. In addition, OSS management has not monitored to determine the magnitude of the problem of social workers not regularly visiting their children. If OSS developed a management information system to utilize data collected from social workers, management could measure the depth of the problem, better understand the numbers of social workers needed on staff, and more successfully present to the Legislature a picture of the needs of the agency. (See pages 46 through 48.)

Children who must be separated from their families need support in order to adjust to changes in their life situations. The social worker should

serve as a stable base of familial support. When the worker does not visit a child in custody regularly, OSS does not provide needed support to the child.

Assessment of Goals and Objectives

The Division of Family and Children's Services has not developed an assessment mechanism for evaluating the achievement of either the long- or short-range objectives contained in the Comprehensive Annual Social Services Plan.

In 1985 PEER found that the Department of Public Welfare had not developed an assessment mechanism for evaluating the achievement of either the long- or short-range service objectives of the department. This deficiency has not been corrected in the Division of Family and Children's Services. Social service goals and objectives for the Division of Family and Children's Services continue to be generalized and vague. Long-range goals and objectives are too broadly stated to be measurable and are not linked to quantitative indicators. Management's inability to measure achievement of many of the objectives is compounded by the fact that the division has not yet adopted an assessment mechanism for evaluating the achievement of either the long- or short-range objectives even if they were operationally stated.

Assessment of Service Standards

The Division of Family and Children's Services has not designed measurable statewide service standards to assess the quality of the services delivered to clients.

PEER examined the service standards submitted by the Division of Family and Children's Services which were included in the checklist used by the Division of Program Integrity (the internal audit component of the department) for social worker evaluations. These service standards are skewed to reflect the timeliness of service delivery rather than the quality of service delivered. This was true in 1985 and it continues to be a divisional weakness.

The lack of statewide, measurable service standards compromises the integrity of the agency because the division cannot internally assess the quality of the social services its case workers are delivering. More importantly, social workers whose quality of performance is not formally measured are routinely assigned to clients. Possible client exposure to poor quality social workers is mitigated somewhat by the fact that case supervision is placed with a trained social worker supervisor. These social worker supervisors conduct periodic meetings with individual social workers at which time they discuss and review case planning and quality of service issues with social workers, though not within the framework of

formal evaluation criteria. This does address the concern PEER had in its 1985 report that supervisors who did not have the experience or training to make professional service standards evaluations were responsible for evaluating the quality of service. However, the continued lack of comprehensive supervision and evaluation standards for supervisors compromises the accountability structure of the division.

*Assessment of Case Documentation,
Planning and Management*

PEER reviewed many Office of Social Services case files that lacked completeness and consistency, did not serve as an accurate reference of case history, and did not sufficiently document service delivery.

In 1985 PEER reported that social workers' documentation of their observations of clients' personality components, intricate family dynamics, documentation of client contact, and documentation of case plans differed widely both intercounty and intracounty. A purposive review of case files shows that substantial differences still exist in worker adherence to the documentation standards promulgated by the division and that significant diversity exists in the substance of the information included in the case record. Some social workers documented their observations of client and family dynamics and their records of contact in a professional and analytical fashion in case files. These same social workers had substantive case plans which included specific client goals and objectives along with timetables within which client goals and objectives should be achieved.

Many of the case files examined, however, contained only the most basic of information and often that information had not been maintained in accord with OSS policy. These records of contact and case planning were vague and contained minimal analytical substance. Records of this type are not useful for the purpose of providing continuity of service delivery, nor can they substantiate a case in court. Providing a scientific estimate of the extent to which case documentation is inadequate would depend on an analysis of documents contained in individual case files maintained in offices throughout the state. Since failure to document even a single case properly has serious implications for the individuals involved, PEER chose to forego a scientific estimate of case documentation deficiencies in favor of a more cost-effective review process to establish that current documentation efforts are often inadequate. While PEER's purposive sampling procedure does not allow a quantifiable estimate of the extent to which case records within the division are inadequate, the number of files found to be inadequate in the counties reviewed would be sufficient to prompt a prudent manager to review the situation and take corrective action.

*Workload Management/Service Records
and Documentation*

Heavy paperwork requirements reduce the amount of time available to social workers for social service delivery.

In a 1985 staff report, PEER reported that heavy paperwork requirements and temporary assignment of social workers to non-social-work tasks reduced the amount of time available for social service delivery in the old Department of Public Welfare. Subsequent creation of the Division of Family and Children's Services has virtually eliminated assignment of social workers to non-social-work tasks, but has done little to reduce the paperwork requirements of the job. In part, this can be understood. Documentation of client contacts and worker plans and actions is vital to a responsible and responsive service structure and these require an audit trail. However, the needed documentation should be as efficient and nonduplicative as possible.

In 1985 PEER noted that a support staff committed to assisting with documentation and records maintenance was badly needed. While social workers can never be completely relieved of the time requirements for documentation, access to support staff dedicated to assisting with the maintenance of physical records and reports would free the professionally trained workers to be more responsive to the direct service needs of their clients. While it is the social worker that is professionally responsible for insuring the integrity and completeness of records and for providing ideas on controlling duplication and unnecessary paperwork, providing clerical assistance can be a cost-effective step in giving social workers more time for direct client contact without sacrificing needed documentation.

One time-consuming non-social-work task social workers still perform is the transportation of Medicaid patients to physicians under the terms of a contract with the Governor's Office of Medicaid. Though this is an important service that is needed within the state, it is a service that does not require a trained social worker. The only role is as a driver and that could be performed by a non-professional employee, thus freeing the social worker for those tasks that do require expertise.

Recommendations

1. In conjunction with recommendation #2, page 48, the task force should review the existing quality assurance system and develop a prioritized plan of action for addressing the automation and information needs of regional and area offices.
2. As part of the task force review to assess the management information needs of the Office of Social Services (see recommendation 2, page 48), the Director of OSS and the Director of OSS's Administration Unit

should determine the data collection and output needs of direct service staff and administration for tracking social workers' compliance with OSS monthly visitation requirements for all children in custody. A feedback process should be designed to allow individual social workers, as well as management, to track monthly visitations. The time frame for completion of this task should correspond with those established in recommendation 2, page 48.

3. Starting immediately and until a complete data collection and feedback loop for visitation data is established, area directors should require area social work supervisors to report on the visitation of children in custody, including an analysis of the time spent in visitation per case and, where appropriate, an estimate of the additional time needed in visitation to meet service standards (see recommendation 3, page 45).
4. Assuming that federal funds can be found to hire the thirty-five social worker aide positions appropriated under Senate Bill 3117 (1992), area social work supervisors should utilize the aides to relieve social workers of some routine duties, such as driving clients to medical visits and routine paperwork. This would allow social workers more time to conduct required visitations or to provide other professional services to clients.
5. Area directors should hold meetings prior to November 1, 1992, with their respective area social work supervisors and social workers to identify opportunities for paperwork reduction and to assess the feasibility of utilizing clerical staff to complete any paperwork not requiring professional knowledge, skills and abilities. The area directors should submit a comprehensive paperwork reduction and clerical staffing proposal, including a cost-benefit analysis, by January 1, 1993, to the Director of the Office of Social Services. By April 1, 1993, the Director of the Office of Social Services (after consulting with area directors, the directors of OSS's Administration, Protection and Placement Units and the Director of DHS's Management Information Systems) should complete a review of the area directors' proposal and adopt a plan and timetable for a paperwork reduction program. The superordinate goal of this paperwork reduction program should be to reduce the amount of time spent by professional staff in forms completion without sacrificing necessary management information. The Director of the Office of Social Services should also submit at this time a cost-benefit plan for clerical assistance to the Executive Director of the Department of Human Services for inclusion in DHS's FY 1995 budget request and for consideration in reallocating existing clerical resources of the Department of Human Services.
6. The Director of the Office of Social Services should require area directors to conduct annual community needs assessments and to report the results to OSS in January of each year. OSS staff should then use the area needs analyses to identify the needed programs and

activities for the coming year and to formulate goals and objectives for those programs and activities. The objectives should include a statement of the type of action to be taken, an active verb directed toward a specific object, the quantity of work to be performed and the time frame in which the work is to be accomplished. Area directors should develop specific criteria for measuring achievement of all short- and long-term goals and objectives identified. All work should begin September 1, 1992, should be completed in time to be included in the department's Comprehensive Annual Social Services Plan, and should be conducted annually thereafter.

7. The Director of the Office of Social Services should require area directors to meet with area social work supervisors in their respective regions to devise formal social worker service standards and procedures to measure the quality of services delivered to clients, including quality assurance elements to be used in case planning and service documentation, as well as the timeliness of these services. Area directors should submit a composite report with operationally defined recommendations for service standards and procedures to the Director of the Office of Social Services for final approval and implementation by January 1, 1993. (Operationally defined recommendations would include detailed definitions of all components of the system, including the record elements to be reviewed, the individuals responsible for each procedure or action, and the time frame in which actions are to be completed.) Training of social workers and supervisors on the use of the revised performance elements should be completed by the Office of Personnel and Staff Development by July 1, 1993.

Care of Children in Custody of the State

OSS could be more effective in certain areas which affect the care of children in custody of the state. OSS could improve in the areas of monitoring and reducing the number of children who stay in emergency shelters beyond the thirty-day policy limit and reducing the amount of time taken to license a foster care home. OSS should also hasten its development of a multi-level reimbursement system to encourage in-state psychiatric treatment providers to develop facilities so that more children can be treated inside the state.

The Office of Social Services held twenty percent of children placed in emergency shelters over the 30-day policy limit (104 of 522 over a six-month period). Of the 104 children staying in shelters beyond the 30-day period, social workers did not obtain proper approval to retain at least 16%.

A lack of treatment facilities for emotionally disturbed children and OSS's failure to monitor properly contributed to the problem.

Emergency shelters are designed as interim placement to care for children who are in danger of abuse, neglect, or exploitation, or who have been ordered into custody by the court. As shown in Exhibit 17, page 49, at January 1, 1992, 364 of the 2,830 children in custody of the state were staying at emergency shelters. The majority of children (1,608) were being cared for in foster homes. OSS policy sets a thirty-day maximum for holding children in shelters because children should be placed in the least restrictive setting, preferably with relatives or foster families. In response to complaints, PEER researched the number of children staying in shelters and found that 104 children being cared for by OSS had been held longer than 30 days at nine emergency shelters around the state. Although the problem occurred with only 3% of the total 3,596 children held in custody during the six-month period, Mississippi and the OSS failed in appropriately placing those children. Of the 522 total children placed in shelters during the six-month period, 20% stayed longer than the thirty-day limit.

OSS policy sets a maximum of thirty days for children to be held in emergency shelters to give the social worker time to work with the family so that the child may be returned, identify and evaluate relatives who will take children, and/or gather information to determine appropriate foster care if necessary. OSS policy recognizes that there are occasions when thirty days in the shelter does not allow the social worker sufficient time to place a child appropriately. Social workers must obtain the permission of their supervisors in order to retain children over thirty days. If the children are held in one of three OSS-operated shelters longer than thirty days, the social worker must obtain permission from the state office.

Several factors may have contributed to OSS's inability to place children in homes in a timely manner, as discussed below:

- *Lack of treatment facilities for emotionally disturbed children*

Mississippi has historically had insufficient psychiatric and therapeutic facilities to care for children with emotional problems who cannot successfully be placed in traditional foster homes due to their inappropriate behavior.

- *Lack of monitoring of the policy by OSS*

According to policy, workers must obtain state office approval to keep children in state-operated shelters over thirty days. PEER reviewed state office files to determine if workers had obtained approval for the 39 children held in state shelters over thirty days during the six-month period. OSS could not provide 17 of 39, or 44%, of the extension

requests which should have been in file. OSS has not monitored to ensure that all workers obtain approval for requesting extensions. The lack of monitoring has reduced the authority of the policy.

PEER could not estimate the extent to which supervisors were giving proper approval to extend the stays of children in privately operated shelters because those records are kept in eighty-two county offices. But it is clear that, of the 104 children staying in shelters beyond the thirty-day period, social workers did not obtain approval to retain at least 17 of 104, or 16%.

- *Availability of staff time to find placement for children*

OSS officials told PEER that one factor affecting children's length of stay in emergency shelters is the need for additional foster homes in which to place children. The officials stated that additional staff is needed to recruit and train foster parents. PEER found that only 3.4% of social workers' time in CY 1991 was spent in this activity (11.8 full-time equivalent social workers). With the equivalent of fewer than twelve full-time social workers recruiting and licensing all new foster homes in the state, OSS may be able to justify requesting additional staff to accelerate the transfer of children out of emergency shelters and into new foster homes. However, OSS has not developed workload data to verify the additional staffing needs (see page 34).

Failure to find timely, appropriate placement can have a detrimental effect on a child's emotional health. The lack of permanence when being placed in an emergency shelter can heighten the child's doubt and uncertainty.

The Office of Social Services averages 158 days to license foster homes across the state, compared to a statewide policy requiring that licensing be accomplished within ninety days.

The state OSS licenses foster homes based upon foster home studies conducted by county social workers. Social workers or their supervisors also give potential foster parents twelve hours of relevant training which is required for homes to be licensed. The foster home study includes inspection of the foster home, background and reference checks, and interviews with all foster family members to determine motives and lifestyles. PEER measured the length of time taken to license homes beginning with the foster parents' application date and ending with the date of the final state approval. PEER found that on average the statewide licensing process lasted 158 days. (Foster parents in some counties do not fill out the application form until near the end of the training period. Because the state has no method of measuring the length of time between the first inquiry of foster parents about the program and the application

date, the actual length of time in the licensing process is somewhat longer than 158 days.)

DHS's state policy is that foster homes be approved within a ninety-day period. PEER takes the position that the ninety-day policy is appropriate. However, the present standard could be difficult to meet because on a statewide basis only 3.4% of social worker time is spent in preparing foster home studies for licensing. Apparently foster home studies are a low priority for social workers on an overall basis. Therefore, if social workers spend more time on foster home studies, other duties, such as visitation of foster home children, investigation of child abuse and neglect, working with families to prevent additional abuse and neglect, and placing children, will receive less attention.

The problem of prolonged foster home studies is related to OSS's lack of information on the average amount of time to be allocated for each major social work activity, as described on page 34. If this information were developed, as well as information on county caseloads and OSS priorities and service standards, OSS could systematically address its timeliness problems.

The result of prolonging foster home studies is that fewer foster parents will be available with which to place children at any given time. If social workers put more time into recruiting foster homes, then other areas of social work suffer. But placement would be much easier if ample foster homes were available.

OSS's lack of a multi-level payment schedule by type of service has discouraged the development of therapeutic and psychiatric treatment facilities in Mississippi. Due to insufficient treatment capacity in Mississippi, fifty-nine percent of children receiving psychiatric residential treatment in federal FY 1991 were placed in out-of-state facilities, making the goal of returning children to their families more difficult to achieve.

OSS regularly places children in treatment facilities for the rehabilitation of emotionally disturbed children who have been physically or emotionally abused. The facilities consist of therapeutic treatment such as high-skilled group foster homes and residential treatment facilities, where children with severe behavior and emotional problems can be treated by psychologists or other professionals in the field. OSS continually faces the challenge of locating appropriate facilities as well as the funds to place these children. Because of waiting lists at therapeutic care facilities in the state and due to a lack of appropriate long-term psychiatric treatment facilities for children diagnosed with dual-disorders, OSS placed children in seven out-of-state residential treatment centers in federal FY 1991.

OSS expenditures for out-of-state residential treatment for seventeen children in federal FY 1991 totalled \$311,615. Twelve children were placed

in two in-state facilities at a cost of \$107,329 in federal FY 1991. The total spent on residential treatment of the twenty-nine children both in and out of state in federal FY 1991 was \$418,944.

OSS officials assert that placing children in facilities in Mississippi would be preferable for the following reasons:

- Children would be closer to their parents. Closer proximity improves the chances of working out problems existing within families which led to the initial separation of the parents and children. OSS's goal is working to return children to their parents. Treating children at long distances from their families reduces the chances of reuniting families.
- Treating children closer to home would reduce costs to the state. When children are treated out of state, OSS must pay travel costs for children and social workers on the initial visit and perhaps additional visits. Treatment facilities in Mississippi could possibly cost less than some out-of-state facilities due to lower costs of living. For instance, the two in-state residential treatment facilities used by OSS in federal fiscal year 1991 cost approximately \$52 per day, while the seven out-of-state facilities averaged \$100 per day.

Service providers have not expanded treatment capacity in the past due to:

- lack of funds for start-up costs,
- uncertainty about how much OSS would reimburse for services provided at new facilities. In the past OSS has only been able to guarantee that the minimum board payment for children without special needs would be paid in the event of placement because OSS has not had a multi-level reimbursement schedule based on type of treatment provided.

OSS officials stated that some service providers have asked OSS to guarantee that the state place a certain number of children in their programs if they start new ones. Other providers have asked OSS to provide the start-up costs for new facilities. OSS officials stated that they could not guarantee placement in new facilities due to changes in the needs of children and could not open new facilities due to lack of funding.

In October 1991, OSS began working to provide more equitable reimbursement to child care facilities by starting a dialogue with service providers in the state. OSS is working to formalize agreements to guarantee specific levels of compensation to providers for certain types of treatment. These formalized "levels-of-care" will encourage service providers to start new facilities because the providers can rely on OSS to pay them a certain amount of money for a particular type of service. OSS

officials stated that they cannot guarantee that a certain number of children will be placed in any given facility, but only that if a child is placed OSS will reimburse a given amount based on the type of service.

As a result of this levels-of-care system, service providers will be better able to assess the risks of starting a new venture and plan a budget for running a new facility. OSS officials hope that the new system will encourage the opening of new facilities in Mississippi, making it easier to keep children in the state and therefore to reunite and hold families together.

Recommendations

1. The Director of the Office of Social Services should enforce OSS's policy of requiring social workers to obtain permission to hold children in emergency shelters over thirty days. By September 1, 1992, the Director should assign an employee to monitor OSS's monthly shelter enrollment reports, determine the workers who have not requested permission from the state office to extend state-operated shelter stays, and provide this report to the area directors. Area directors should follow up with area social work supervisors to implement corrective action plans to address the problem of children staying longer than thirty days without permission. Working in conjunction with the area directors, the Director of the Placement Unit should submit formal approval standards for extension of stays to the Director of OSS for approval and implementation by November 1, 1992. These approval standards should expand the policy already in place to include not only state-operated shelter stay extensions but also extensions for private shelter stays. The standards should define the documentation necessary for approval of an extension of stay beyond thirty days, including, but not limited to, evidence of continued need for shelter or placement and the fact that alternative placement appropriate to the child's needs was sought but not found.
2. The Director of OSS's Placement Unit should place priority on completing and implementing the levels-of-care reimbursement system for therapeutic and psychiatric residential treatment to be submitted for approval to the Executive Director of DHS by October 1, 1992. The reimbursement system should enter the implementation phase by January 1, 1993.
3. By January 1, 1993, OSS's Placement Unit Director and staff should:
 - develop a complete list of emotionally disturbed children categorized by their specific needs for treatment;

- develop a complete list of types and numbers of beds available in therapeutic and psychiatric residential treatment centers;
- measure the needs which are presently being met by listing the children in state custody who are being appropriately treated;
- determine the number of children with needs who are not being treated;
- measure the gap between needs of the children and the resources available; and,
- estimate, with the assistance of the DHS Accounting and Finance Division, the cost of placing children in the appropriate therapeutic and psychiatric residential care in Mississippi and the cost of placing those children out-of-state.

In January 1993, the Executive Director of DHS should provide this analysis of the needs and resources in Mississippi to:

- service providers in Mississippi to make them aware of the number of children in the state who are in need of therapeutic and psychiatric care, so they can better plan for establishing treatment centers;
- child advocacy public awareness groups so that they can rally public support for expanding resources to treat children, both publicly and privately; and,
- lawmakers and policy makers to alert them to the depths of the problem and the estimated costs of solving the problem so that they may better plan for the future of Mississippi's children.

OSS should update this analysis semiannually to monitor the effect of the levels of care reimbursement system on the availability of treatment in the state and to track the division's progress in meeting the needs of children.

Financial Management

In the area of financial management, PEER found that OSS could improve its effectiveness in issuing foster care board payments and child services payments in a more timely manner and improve documentation for child services payments.

OSS does not consistently issue foster care board payments to foster parents on a timely basis.

PEER found that the state's first board payment due to a foster parent is often late. PEER reviewed the initial payments due to foster parents during the six-month period ending December 1991 and found that 100 of 422, or twenty-four percent of the initial payments, were one or more months late.

The DHS Client Payroll department inputs information about foster parents on the computer system so that they may receive monthly payments for care of children in state custody. In order to process the "board payments," the Client Payroll Unit receives information generated by the social worker. The foster parents' names remain in the system to receive monthly payments until some change occurs in the case.

The Client Payroll Unit, in accordance with DHS policy, requires that information regarding the new foster family be received from the social worker by the third day of each month. The Client Payroll unit then processes this information so that checks can be mailed on the fifteenth day of the month. If county social work offices do not send their paperwork to the Client Payroll Unit by the third of the month as cited above, foster parents do not receive their first checks until the fifteenth of the following month.

Before foster parents can receive their foster board payments, OSS social workers must research the financial background of each child to determine if the child is eligible for Medicaid and if the foster parent can be paid with IV-E federal funding instead of state funds. DHS is currently changing to a new process in which the eligibility of foster children for receipt of federal funds is determined at a central OSS state office location. Under the new process the social worker will continue to research the child's background, but the state office workers will actually determine eligibility based on the information provided by the social worker. The primary benefit of the new process is that more federal IV-E funds can be claimed by the state to pay for foster board payments. However, when the transition period to the new system is complete, social workers should benefit by having less paperwork.

The late payments are caused by several factors:

- *Social workers in the state have had a negligible amount of clerical help, so that they must perform not only their social work duties but primarily all related clerical tasks. The Child Welfare League of America standards state that, "To facilitate efficient use of professional personnel, all clerical duties should be performed by the [agency's] clerical staff." [CWLA Standards for Foster Family Service, Copyright 1975, p. 90] In its 1992 session, the Legislature approved 54 new clerk positions for OSS offices for FY 1993. OSS*

should utilize these clerks to address the late payment problem. In FY 1992 OSS officials cited a need for 118 clerk typists at the county level.

- *The current computer program which generates the board payment checks needs revision to improve its flexibility.* Currently, the Client Payroll Unit must receive information on the foster families by the third of each month to be batch-processed so that checks can be mailed by the fifteenth of the month. When children are taken into custody during the last few days of the month, the social workers and the state eligibility unit have little time to determine Medicaid and federal IV-E funding eligibility.

The DHS Management Information Systems section should evaluate and develop the most effective and efficient of several online systems options to allow client payroll workers to edit foster board payroll information directly instead of relying on keypunch operators. Direct editing would save time for the Client Payroll Unit and therefore allow social workers and eligibility unit workers additional time to process board payment information at the end of the month.

- *Because the state administration office must obtain the same information from social workers as has been required in the past, the same potential for late payments exist.* If the state-office workers do not have the necessary information on the background of the child to determine that the child is eligible for IV-E funds, then this could delay the board payment.

Late foster board payments send the wrong message to foster parents--that OSS is not dependable in caring for foster children. OSS could lose much-needed resources in the form of foster parents as a result of such treatment. Foster parents who are themselves dependable, prompt and well-organized may be discouraged by their involvement with a state office which sometimes appears to lack these qualities.

OSS is not consistently timely in the payment of vendors and foster parents for services for children in custody of the agency and sometimes makes payments without proper documentation.

DHS pays for services to children such as medical payments, psychological exams and therapy, initial clothing to children who have been taken into custody, school supplies, emergency utility bills when necessary to prevent the neglect or removal of children from their homes, Christmas gift allowances, and special needs of children. OSS social workers are responsible for forwarding the bills for these services to the designated bookkeeping clerks in each county so that the bills may be paid

on at least a weekly basis. In some instances social workers have not consistently forwarded bills to the bookkeeper in a timely manner. PEER also found that proper documentation was not being obtained consistently by all bookkeepers before expenditure of funds.

PEER reviewed financial records in Hinds and Rankin counties. It cannot be assumed that the situations found in these two counties are occurring statewide, although some other counties may face similar problems.

- *OSS is not always timely in the payment of vendors and foster parents for services for children in custody of DHS.*

Hinds County--PEER reviewed a sample of all types of child services bills paid in Hinds County in December 1991 through February 1992 and found that most were made in a timely manner. Due to specific complaints from therapists that payments were not timely, PEER conducted a more detailed review of February 1992 payments to psychologists and therapists. Because three of five payments to psychologists were late during February and paid an average of 59 days after receipt of invoice, it appears that Hinds County has more of a problem with paying these types of bills in a timely manner. In the past social workers have often received therapy billings after the date of service as opposed to bills for such items as clothing and supplies, which are usually obtained on the date of purchase. This may explain why therapy billings tend to be paid in a less timely manner than other types of billings.

The new branch director in Hinds County, who started in January 1992, addressed the late payments within his first three weeks of employment by placing more emphasis on processing bills through methods such as memos to and meetings with county personnel stressing timeliness and assigning an individual to speed up bill processing.

Rankin County--In a sample of February payments in Rankin County, most checks paid for child services in February 1992 were late and the invoices on the date of payment were an average of 106 days old. Rankin County staff have begun to address late payment problems by stressing at weekly staff meetings that paperwork be completed in a more timely manner.

MISS. CODE ANN. Sections 31-7-303 and 31-7-305 mandate that public bodies should pay bills no later than forty-five days after the receipt of the invoice and the receipt, inspection, and approval of the goods or services being purchased. Therefore Hinds and Rankin counties have not complied with this law in paying for some child welfare services.

Late payments to vendors could have been caused by several factors. Offices with an insufficient number of social workers may have placed low priority on getting paperwork completed so that bills can be paid in a timely manner. In addition, supervisors, who also must contend with the understaffing in the department, did not devise organized systems to ensure that payments are made in a timely manner.

Late payments undermine the credibility of the state Department of Human Services. If vendors do not believe they will get paid in a timely manner, in the future they may refuse to provide much-needed goods and services to benefit the children in custody of the state. The state may then have less choice in choosing those vendors who provide the best quality and/or most economical goods and services.

- *OSS sometimes makes payments without proper documentation.*

DHS policy requires that an "itemized invoice, bill or acceptable receipt" be obtained before a child services check may be issued. Social workers are responsible for providing county bookkeeping clerks with invoices for child service purchases as evidence that the purchase was made for the purpose intended. However, Hinds and Rankin county personnel have not always obtained invoices or receipts before writing checks or placed priority on obtaining proper documentation after expenditures have been made.

Hinds County--In Hinds County, checks were written before invoices were obtained for over forty-one percent of the child service expenditures during December 1991 through February 1992. PEER understands that in some instances emergency expenditures need to be made before an invoice or receipt can be obtained--e.g., payment of a utility bill for the residence of a child in state care. However, in many instances, Hinds County receipts were not on file for expenditures which were three months old, which indicated that insufficient effort was made to obtain invoices or receipts after checks were written.

The checks written without invoices were largely for expenditures made with county funds, because the state office requires that receipts be obtained when reimbursing county funds. During April 1992, the new branch director in Hinds County required that no expenditures of county funds be made without his specific approval for each expenditure. As a result, expenditures without invoices or bills were effectively halted during that period. Subsequently the branch director returned this approval function to the Hinds County area supervisors with specific instructions to continue this monitoring.

Rankin County--In a sample of February payments in Rankin County, invoices were not in file for 29% of checks paid from county funds during February.

The risk for abuse of funds increases when receipts are not required, as follows:

- foster parents who receive funds on behalf of children may not use the funds to benefit the children; or,
- funds may not be spent by personnel in compliance with DHS policy.

In April 1992, Rankin County had not paid a backlog of child service bills totalling approximately \$3,900.

Statewide, the local boards of supervisors provide regular allotments of "county funds" which are used to pay virtually all child service bills, many of which are then reimbursed by the state. As of April 17, 1992, Rankin County OSS had not paid a backlog of child service bills totalling approximately \$3,900. The office had insufficient county funds to pay these bills.

MISS. CODE ANN. Sections 31-7-303 and 31-7-305 mandate that public bodies should pay bills no later than forty-five days after the receipt of the invoice and the receipt, inspection, and approval of the goods or services being purchased. Therefore Hinds and Rankin counties have not complied with this law in paying for some child welfare services.

PEER found that the backlog of child service bills was impacted by several factors:

- *The Rankin County Board of Supervisors makes Child Welfare Service funds available to the Rankin County OSS on a request-only basis, instead of in regular allotments, as many boards of supervisors do.* Because the county funds are paid on an irregular basis, it is harder for the Rankin County OSS to develop a working capital balance from which to pay bills in anticipation of reimbursement from the state.
- *A Rankin County judge ordered several expenditures by Rankin County for testing and placing children in treatment facilities.* These court-ordered expenditures on behalf of three children significantly reduced the county's allocation of state funds to pay for child welfare services for fiscal year 1992.
- *The state office discourages the counties from requesting direct payment to the vendors and prefers that counties first pay the vendors and then request reimbursement from the state.* (It

reportedly is more costly to write vendor checks from the state level, because every time a check is written to a new vendor, a new vendor file has to be created.) As a result, when counties such as Rankin do not have the funds to pay vendors directly, their ability to pay vendors in a timely manner is delayed because they must request special permission.

Rankin County should have requested direct payment to vendors on a more timely basis. However, the Rankin County OSS bookkeeper stated that she was unaware of this option until April 1992.

- *According to Rankin County personnel, some social workers were slow in getting paperwork processed.* In part this may have stemmed from past administrative problems in Rankin County. When the current Rankin County bookkeeper was hired in September 1991, DHS's internal audit department was called in to help set up a bookkeeping system in the office which had excessive numbers of overdue bills.
- *One Rankin County vendor's payments were delayed in part because the vendor was waiting for Rankin County to register some children for Medicaid.* The vendor planned to file for Medicaid upon receipt of proof of Medicaid eligibility. (Establishing eligibility for children for Medicaid is a time-consuming process which may not always be given priority by social workers.)

If it is widely known among vendors that the state Department of Human Services is an uncreditworthy customer, then the department may have fewer vendors from which to choose. If vendors do not believe they will be paid in a timely manner, in the future they may refuse to provide much-needed goods and services to benefit the children in custody of the state. The state may then have less choice in selecting vendors who provide the best quality and/or most economical goods and services.

Recommendations

1. Beginning immediately, the OSS Director of Administration should begin monitoring monthly to determine how the new program of processing federal funding eligibility paperwork at the state office level affects the timeliness of payments to foster parents. In response to the monthly monitoring, the OSS Director of Administration, in coordination with the Client Payroll Unit and the area social work supervisors, should revise procedures as necessary to improve timeliness of payments.
2. Beginning immediately, in counties where the old system of locally determining IV-E eligibility is still operating, area directors should monitor county social workers' timeliness in submitting the completed

190F eligibility determination forms to the Client Payroll Unit. In regions where the new state-level system of determining IV-E eligibility is operating, area directors should insure that county workers submit necessary information to the state office as soon as possible so that the state office can complete 190F forms by the third of each month.

3. By October 1, 1992, area supervisors should appoint one staff person in each county office or be responsible themselves for insuring that all 190F forms are sent to the appropriate location in a timely manner.
4. By October 1, 1992, the Director of the DHS Division of Management Information Systems, the Director of Accounting and Finance, the OSS Director of Administration, and the supervisor of the Client Payroll Unit should perform a cost-benefit analysis in selecting the most effective and efficient online system to allow client payroll workers to edit foster board payroll information directly. The objective of an online system would be to allow flexibility in the system to reduce late payments to foster parents. The recommended system should be installed by January 1, 1993.
5. All area directors should immediately begin to conduct a quarterly review of county bookkeeping systems to insure that social workers submit bills for payment and bookkeepers mail checks in a timely manner.
6. Beginning immediately, all area social work supervisors should require social workers to submit bills on a regular basis, such as weekly.
7. County office bookkeepers should immediately begin to check the billing or invoice date to identify those invoices which have not been submitted by social workers for payment within a week of billing or receipt of invoice. The bookkeeper should maintain a record of social workers who do not submit bills or invoices according to the one-week standard and should submit this record to the area social work supervisor on a monthly basis.
8. Beginning immediately, area social work supervisors should require that invoices or original bills be obtained in advance of payment as required by policy. In situations where it is impossible to obtain receipts in advance, such as in emergency situations, area social work supervisors should require social workers to bring receipts to the bookkeeper within one week's time.
9. When possible, social workers should obtain all bills at time of service, such as the day of psychiatric care, and not wait to be billed by the service provider. This will speed up the payment process.
10. Area social work supervisors should immediately begin to:

- monitor to see that writing child service checks without obtaining proper documentation occurs only in emergency situations; and,
 - check records regularly to monitor which social workers have not obtained bills or receipts for expenditures for which they are responsible.
11. Bookkeepers should immediately begin to submit weekly reports to area social work supervisors informing them of checks written without obtaining documentation according to policy to ensure that the receipts are received in as timely a manner as possible.
 12. The Rankin County Board of Supervisors should work with the area social work supervisor to establish the level of need for a working capital fund for child service payments in the Rankin County office. Resulting proposals should be completed in time for the next Rankin County budget cycle.
 13. To insure the timely payment of bills, the OSS Rankin County bookkeeper should make special requests that the state pay each vendor bill directly until a capital fund can be included in the Rankin County budget. The Director of Family and Children's Services should make the DHS Director of Accounting aware of the need for special handling of Rankin County payments and of any progress made in the establishment of the appropriate capital fund in Rankin County.
 14. In regard to Medicaid procedures:
 - Social workers, or preferably social service clerks who may be available in future, should register children for Medicaid eligibility as soon as possible and then locate doctors who are Medicaid providers;
 - Supervisors and bookkeepers, who both must sign the request forms, should also monitor whether social workers have registered children for Medicaid in every possible case;
 - OSS area directors should re-emphasize to all workers the importance of registering children to receive Medicaid as soon as possible and should coordinate with area social work supervisors to provide any training or retraining that may be necessary regarding Medicaid eligibility procedures.

A Review of Management of the Office of Youth Services by the Department of Human Services

May 26, 1992

Executive Summary

Introduction

The PEER Committee received a legislative request to determine "how Department of Human Services management has incorporated the programs of the former Department of Youth Services."

Background

Since 1918, Mississippi has operated facilities and services to treat and rehabilitate troubled youth. From 1973 to 1989, the Department of Youth Services functioned as an autonomous agency of the executive branch of state government. The Mississippi Executive Reorganization Act of 1989 created, among others, a new agency identified as the Mississippi Department of Human Services (DHS).

The Department of Human Services is an umbrella agency anchored primarily by the former Department of Public Welfare. Several smaller agencies, including the Department of Youth Services, were placed under the new umbrella agency. The former Department of Youth Services is now referred to as the Office of Youth Services and is located within the Division of Family and Children's Services of DHS.

A five-member governing board, appointed by the Governor, serves as the policymaking body for DHS. (At the time of this report, legislation had passed both houses that would abolish the Board of Human Services and place the agency under the direct control of the Governor.) An executive director manages the day-to-day operations of the agency and serves at the will and pleasure of the Governor.

Upon reorganization, the former executive director of the Department of Youth Services became the director of the Office of Youth Services and reports to the director of the Division of Family and Children's Services. Accounting, personnel, training, and other administrative staff were transferred to the administrative division of DHS as part of reorganization.

Overview

Most of the promised benefits of reorganization have not materialized for Youth Services. Youth Services' annual administrative costs for personnel have increased by \$109,900. The DHS administrative division charges the Office of Youth Services more for administrative support (e.g., personnel, purchasing, accounting) than the cost of the administrative positions that were transferred to DHS under reorganization.

The daily functions of the Office of Youth Services have been hampered by multiple levels of management control present in DHS. Administrative functions such as personnel, purchasing, and budgeting have become more complex, as up to six layers of management may be involved in administrative decisions at DHS.

Youth Services' merger into an agency directly controlled by a gubernatorial appointee has diminished its ability to focus on its primary mission of serving delinquent youth. Prior to reorganization, Youth Services' complete focus was on providing services to Mississippi's delinquent youth. Subsequently, Youth Services has found itself in a large, complex agency competing with divisions of the former Department of Public Welfare for resources. Furthermore, Youth Services must compete for resources with other statewide priorities of the Governor (e.g., education, economic development).

The level of in-service training provided to Youth Services employees has decreased since its reorganization into DHS. In addition, the merger of Youth Services has not reduced duplication and fragmentation of children's services as was suggested by the Governor's reorganization proposal in 1988.

Findings

The merger of the Department of Youth Services into DHS has resulted in significant changes in the administrative structure and operations of Youth

Services. The changes have produced additional administrative personnel costs, multiple levels of management control, and less independence and visibility for the agency with responsibility for providing services to delinquent juveniles.

Youth Services' annual administrative costs for personnel have increased by \$109,900 as a result of its reorganization into the Department of Human Services.

The Department of Human Services provides the services of seven administrative positions lost by Youth Services during the reorganization, and the Office of Youth Services reimburses DHS for the cost of the services. The annual reimbursement is based on DHS's cost allocation plan, which charges each office and division for its pro rata share of the agency's overall administrative expense. As a result of its reorganization into the Department of Human Services, the Office of Youth Services spends 55% more for administration than it did as an autonomous agency, and these costs are expected to increase by at least another 77%, according to DHS consultants.

Daily functions of the Office of Youth Services have been hampered by multiple levels of management control since its reorganization into the Department of Human Services.

The 1989 reorganization transformed the Department of Youth Services from a relatively small autonomous agency with a \$10 million budget, 408 employees and its own governing board to an office within a division in an umbrella agency dominated by welfare programs with a total budget of \$300 million, four thousand employees, and subject to direct control by the Office of the Governor. Administrative tasks (such as personnel actions, budgeting and purchasing) that were once handled by the Youth Services central office staff are now channelled through as many as six layers of management, including the office of the executive director of DHS.

Youth Services' merger into an agency directly controlled by a gubernatorial appointee has diminished its ability to focus on its primary mission of serving delinquent youth.

Youth Services must compete for resources with other DHS divisions, most of which are former divisions of the Department of Public Welfare. Further-

more, because the director of DHS serves at the will and pleasure of the Governor, Youth Services must also compete for resources with other statewide priorities pursued by the Office of the Governor (e.g., education, economic development).

In some instances, the Office of Youth Services has not been allowed to represent its actual fiscal needs to the Legislature. For example, the Governor's staff directed DHS management to submit budget requests to the Legislature for fiscal year 1992 that understated the true needs of the agency, including the needs of the Office of Youth Services. Yet two years later, DHS officials blamed the Legislature for not recognizing DHS's needs and for providing inadequate funding for DHS.

DHS management's lack of attention to Youth Services' needs has continued under the new administration. Despite the fact that Youth Services had sixty-six vacancies (forty-eight vacancies representing direct care positions) due to a lack of funding, the new interim executive director of DHS attempted to place an associate into a management position within the Office of the Youth Services within days of being appointed by the Governor. Subsequent to PEER's request for documentation from the State Personnel Board regarding these activities, DHS officials ceased attempts to employ the individual in the Office of Youth Services and have not employed any additional staff in the targeted position or any other position.

The only notable achievement touted by DHS officials in regard to Youth Services since reorganization is a reduced escape rate from Oakley Training School, despite nothing in the statutory mission statement for Youth Services regarding escape rates. While not discounting the seriousness of the escape problem at Oakley, PEER noted no similar fervor on the part of DHS officials to approach other needs (increased employee vacancy rate, training, etc.) of Youth Services.

The level of in-service training provided to Youth Services employees has decreased since its reorganization into the Department of Human Services.

Youth Services' training specialist position was transferred to DHS's Office of Personnel and Staff Development as a part of reorganization. However, the Office of Personnel and Staff Development does not provide in-service training to Youth Services staff. As a result, the level of training provided to individual Youth Services staff has decreased by up

to sixteen hours per year due to the loss of the training specialist position. DHS also does not compile records from training reports to provide a basis for monitoring the level and quality of training provided to staff. Thus there is no assurance that Youth Services staff receive adequate training to carry out their responsibilities of providing care to delinquent youth. Inadequate training represents a potential liability for the state should an incident occur resulting in legal action against DHS or its officials.

The merger of the Department of Youth Services into the Department of Human Services has not reduced duplication and fragmentation of children's services, as was suggested by the Governor's reorganization proposal in 1988.

DHS staff with responsibility for delivery of children's services acknowledged that little progress has been made in the area of coordination of services between Youth Services and Social Services (child abuse, neglect, etc.) since reorganization. Other than sharing administrative office space, the divisions operate basically the same as before reorganization with separate counselors and supervisors out in the field providing services independently of each other.

In October 1991, frustration with the reorganized system prompted the Mississippi Council of Youth Court Judges (a statutory group consisting of all judges and referees with youth court jurisdiction in Mississippi) to call for the removal of Youth Services from the Department of Human Services. If anything, reorganization has created more problems for the court system, the most notable of which is the added layers of bureaucracy that judges must deal with when corresponding with DHS.

Conclusion and Recommendations

Many of the difficulties of managing Youth Services could be solved by additional funding; however, in light of the recent statewide funding crisis, the provision of a substantial funding increase for Youth Services in the near future is not likely. As such, the importance of focusing all of Youth Services' resources and attention on its primary mission of serving delinquent youth has increased substantially.

Most of the promised benefits of reorganization have not materialized for Youth Services. Instead, Youth Services has experienced commonly cited

disadvantages of being in a consolidated agency: unmanageable bureaucracy, competition, and lack of coordination among divisions. The problems cited in this report did not necessarily occur because of DHS's organizational structure, but because of the management style of DHS officials within this complex organization structure. As such, proper management policies within DHS might have produced the benefits of reorganization that were so highly touted in 1988.

DHS management should effect the following agency policy changes/reviews:

- Continue to monitor and review the agency cost allocation plan to insure that Youth Services pays no more than its equitable share of DHS administrative costs;
- Streamline agency management practices to allow more participation and independence by Youth Services management, particularly in the areas of personnel, purchasing, and budgeting;
- Require that the DHS Office of Personnel and Staff Development establish and monitor a recordkeeping system for training that would permit management to evaluate whether individual staff are receiving adequate training annually; and,
- Review the potential for more coordination between the Office of Social Services (child protection) and the Office of Youth Services by first determining to what extent the philosophies of the two offices can be merged.

DHS officials should initiate these changes and reviews immediately, and provide a written report to the Legislature by December 1992 as to the agency's progress in these areas. The report should include specific steps taken to implement each recommendation and the impact of such changes on the structure and operations of the Office of Youth Services.

If DHS officials do not make progress toward effecting these recommendations, PEER recommends that the Legislature re-create a separate state agency for Youth Services by removing the Office of Youth Services from DHS and restoring the administrative positions lost by Youth Services during the 1989 reorganization.

DHS officials prepared fiscal notes during the 1991 and 1992 legislative sessions that projected substantially different estimates of the cost to re-

store lost administrative positions to Youth Services should it become a separate agency again. The 1991 estimate was less than the original cost of the lost positions, while the 1992 estimate almost doubled the original cost of lost positions. PEER reviewed

both fiscal notes and concludes that a separate Youth Services agency could be created with all former administrative positions reinstated at an annual cost of \$200,761, which is substantially less than the amount Youth Services paid DHS in FY 1992 for administrative services (\$310,661).

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APPENDIX B

SUMMARY OF SOCIAL WORKERS BY COUNTY AS OF APRIL 2, 1992

COUNTY	Allocated Social Workers	Vacancies As of 4/2/92	1991-92 Vacancy Rate	1991-1992 Turnover Rate
Adams	5	2	5%	40%
Alcorn	4			
Amite	1			
Attala	1			
Benton	1			
Bolivar (East)	6	1	12%	33%
Bolivar (West)	2			
Calhoun	3			
Carroll	2	1		50%
Chickasaw (East)	1			
Chickasaw (West)	3			
Choctaw	2	1	37%	50%
Claiborne	2			
Clarke	2			
Clay	4			
Coahoma	5			
Copiah	4	1	12%	25%
Covington	1			
DeSoto	6	2	5%	33%
Forrest	9	1	1%	11%
Franklin	1			
George	2			
Greene	1			
Grenada	5			
Hancock	5	2	3%	40%
Harrison	22	1	1%	4%
Hinds	32	4	3%	31%
Holmes	2			
Humphreys	3	1	11%	66%
Issaquena	1			
Itawamba	3			
Jackson	15	1	0%	6%
Jasper	1			
Jefferson	2			
Jefferson Davis	2			
Jones	10			
Kemper	2			
Lafayette	4		23%	50%
Lamar	2			
Lauderdale	8			
Lawrence	1			
Leake	2			
Lee	17	4	10%	35%
Leflore	3	1	5%	33%
Lincoln	3	1	33%	33%
Lowndes	8	1	7%	12%
Madison	4	1	16%	25%

<u>COUNTY</u>	<u>Allocated Social Workers</u>	<u>Vacant PINS As of 4/2/92</u>	<u>1991-92 Vacancy Rate</u>	<u>1991-1992 Turnover Rate</u>
Marion	4	2	10%	50%
Marshall	6	1	11%	16%
Monroe	8	1	5%	50%
Montgomery	2			
Neshoba	3			
Newton	2			
Noxubee	1			
Oktibbeha	4	1	14%	25%
Panola	4			25%
Pearl River	5			
Perry	1		17%	100%
Pike	5	1	3%	20%
Pontotoc	3			
Prentiss	5			
Quitman	2			
Rankin	7	3	11%	57%
Scott	4	2	2%	50%
Sharkey	1			
Simpson	2			
Smith	2			
Stone	1			
Sunflower	4			
Tallahatchie	2			
Tate	2		17%	50%
Tippah	3			
Tishomingo	3	1	0%	33%
Tunica	1			
Union	3	1	8%	33%
Walthall	2			
Warren	5		22%	40%
Washington	13		5%	18%
Wayne	2			
Webster	1			
Wilkinson	1			
Winston	2			
Yalobusha	2	1	8%	50%
Yazoo	5		27%	40%
TOTAL	348	40	5%	18%

APPENDIX C

**CWLA
RECOMMENDED CASELOAD/WORKLOAD STANDARDS**

Excerpted from
CWLA Standards for Child Welfare Practice
January, 1991

Robert R. Aptekar
Director
Institute for the Advancement of
Child Welfare Practice

INTRODUCTION

Background

Setting standards and improving practice in all child welfare services have been major goals of the Child Welfare League of America since its formation in 1920. With the issuance of new standard-setting volumes or revisions of our old ones, CWLA reaffirms its historic commitment to establish standards that can be used as goals for contemporary practice. As we continue to learn more about the essentials for the healthy growth of children and their families, CWLA standards helps redefine the responsibility of society to provide conditions and opportunities that encourage individual and family development.

Since the inception of its program of standards development, CWLA has formulated child welfare standards, published in a series volumes, based on current knowledge, the developmental needs of children, and tested ways of meeting those needs effectively. The preparation of standards involves an examination of current practices and the assumptions on which they are based; a survey of the professional literature and standards developed by others; and a study of the most recent scientific findings of social work and related fields such as early childhood development, education, mental health, psychology, medicine, psychiatry, and sociology, as they bear on child welfare practice.

The final formulation of standards follows an extended discussion of principles and issues by committees of experts in each area of service, the drafting of a preliminary statement, and a critical review by CWLA member agencies and representatives of related professions and other national organizations.

CWLA's preparation of standards involves the wide participation of local, state, provincial, and national agency representatives. Many CWLA member agencies, including state or provincial human service departments and voluntary agencies, have contributed professional time and travel costs of staff members who have reviewed draft statements and made suggestions for revision. National organizations, including governmental agencies, sectarian agencies, and professional associations in related fields, have taken part in the planning and work of the various committees.

Purpose of Standards

CWLA standards are intended to be goals for the continuing improvement of services. They represent those practices considered to be most desirable in providing services to children and their families.

The standards are directed to all who are concerned with the enhancement of services to children and their families: parents; the general public, citizen groups, public officials, legislators, and various professional groups; those responsible for the provision of services; board members and agency staff members; agencies whose functions include

planning and financing community services; state, county, or provincial agencies entrusted by law with functions relating to the licensing or supervision of organizations serving children; and federations whose membership requirements involve judgments on the nature of services rendered by member agencies.

Standards can stimulate the improvement of services only as they generate dissatisfaction with present practices and a conviction that change is desirable. They offer a base from which to examine and measure practice, the premises from which it has developed, and the current performance of child welfare agencies and their services.

Standards are of use in planning, organizing, and administering services; in establishing state, provincial, and local licensing requirements; and in determining the requirements for accreditation. Standards provide content for teaching and training in child welfare and other related fields, in professional schools, in inservice training and staff development programs, and in the orientation of boards and volunteers. They can help to explain and justify expenditures and budget requests to fundraising bodies, and appropriation requests to legislatures.

Finally, standards can promote an understanding of how each service may more effectively meet the needs of children and their families, what it should be expected to do, and how it can be used. In that way, CWLA standards can help to gain greater public interest, understanding, and support for providing services, targeting legislation, and improving financing.

Differentiation of CWLA, COA, and Licensing Standards

The Child Welfare League of America (CWLA) standards are statements designed to be used as ideals, or goals for practice in the field of child welfare services. They are intended to set targets of excellence to encourage the continual betterment of services for children and their families. CWLA standards carry no implication of control. Rather, they assist agencies in working more effectively, bringing the field's collective experience to bear upon the work of each agency, both public and voluntary. The CWLA standards present practices considered to be most desirable in providing the child welfare services that a community offers through its various agencies. CWLA standards make it possible to compare what is with what is considered desirable, and to judge the extent to which performance approximates or deviates from those goals. The standards are also intended to have an educational purpose in disseminating what is accepted as best current thinking and practice in each area of child welfare service.

Published by the Council on Accreditation of Services for Families and Children, Inc. (COA), the Provisions for Accreditation describe requirements in administration, management, and service delivery. The requirements are rigorous, but realistic descriptions of practice that a competent provider agency should be able to meet. The provisions are based, in part, on CWLA standards. COA, as an independent accrediting body of social

service agencies, establishes a system based on measurable criteria, and as such represents a breakthrough in social service accountability.

Through the licensing of child-placing agencies, residential group care facilities, foster family homes, and child day care facilities, states and provinces exercise their police power to protect children from risks against which they would have little or no capacity for self-care and protection. Police power, as defined by Black's Law Dictionary 1401, is "the exercise of the sovereign right of the government to promote order, safety, health, morals, and the general welfare within constitutional limits and is an attribute of government using the power of the state to enforce laws for the well-being of its citizens." It is the basis of all licensing laws. Licensing provides basic protections by the state or province for the well-being and protection of children.

Caseload/Workload Ratios

A U.S. Children's Bureau document, *Workload Standards for Children and Family Social Services*¹, differentiates caseload and workload measures as follows: (1) caseloads are defined as the amount of time workers devote to direct contacts with clients; and (2) workloads are defined as the amount of time required to perform a specific task.

Although the field could benefit from a standardized caseload/workload model, currently there is no tested and universally accepted formula. It is difficult to arrive at a specific figure for a given caseload/workload because of the wide range of agency settings in which a particular service is offered.

Yet, the CWLA standards most requested are those that provide recommended caseload and/or workload sizes. These ratios of client to staff members offer guidance based upon the field's consensus of what constitutes best practice. In each service volume, they are presented within the context of other recommended standards for staff qualifications and training, supervision, management support, etc. In combination, they provide some direction for agencies, public and voluntary, on how best to maximize the state-of-the-art in child welfare practice.

Although CWLA recommends caseload/workload measures for each area of child welfare practice, workloads are best determined through careful time studies carried on within the individual agency. They should be based on the responsibilities assigned to complete a specific set of tasks, or units of work, for which the worker is responsible. For those agencies interested in developing their own specific workload figures, time required for the conduct of the following tasks should be calculated:

- Travel;
- Collateral visits, outreach activities, and court schedules;

¹ Developing Workload Standards for Children and Family Social Services. Prepared by Peat, Marwick, Mitchell, and Co., in association with CWLA, for the United States Department of Health, Education, and Welfare, 1978.

- Emergencies that interrupt regular work schedules;
- Supervision, consultation, and collaboration;
- Work with community groups;
- Attendance at staff meetings, staff development, professional conferences, and administrative functions; and
- Telephone contacts, reading of records, dictation, reports of conferences and consultations.

In unionized agencies, the place of caseload/workload standard setting in collective bargaining should be determined.

Agency administrators should be concerned about caseload/workload size:

- In order not to assign workers a greater number of cases than they are able to effectively serve; and
- To demonstrate, when necessary, the need for additional staff support in budget preparation and justification.

SUMMARY
OF
CWLA RECOMMENDED CASELOADS/WORKLOADS RATIOS

Name of CWLA Service Volume	CWLA Recommended Caseload/Workload Ratios												
<p>SERVICES FOR ABUSED OR NEGLECTED CHILDREN AND THEIR FAMILIES (including Child Protective Services):</p> <p>Intake Investigation</p> <p>On-Going Cases</p> <p>Combined Investigation and On-Going Cases</p> <p>Supervision</p>	<p>12 active cases per month, per 1 social worker</p> <p>17 active families per 1 social worker, and no more than 1 new case assigned for every 6 open cases</p> <p>10 active on-going cases and 4 active investigations per 1 social worker</p> <p>1 supervisor per 5 social workers</p>												
<p>SERVICES TO STRENGTHEN AND PRESERVE FAMILIES WITH CHILDREN:</p> <p>Family-Centered Casework Services</p> <p>Intensive Family-Centered Services</p>	<p>15 families per 1 social worker</p> <p>2 to 6 families per 1 social worker</p>												
<p>ADOPTION</p>	<p>30 families per 1 social worker with prospective adoptive families</p> <p>20 children per 1 social worker for children under 5 years of age</p> <p>10-12 children per 1 social worker for children 5 years and older</p>												
<p>FAMILY FOSTER CARE+</p>	<p>20-30 children per 1 social worker</p>												
<p>RESIDENTIAL CENTERS FOR CHILDREN*:</p> <p>Social Work Staff Members</p> <p>Supervision</p>	<p>12 to 15 children plus parents per 1 social worker</p> <p>1 supervisor per 5 social workers</p>												
<p>GROUP HOMES*</p>	<p>20-30 children per 1 social worker</p>												
<p>INDEPENDENT LIVING</p>	<p>15-20 children per 1 social worker</p>												
<p>PREGNANT ADOLESCENTS AND YOUNG PARENTS</p>	<p>20-25 cases (the pregnant adolescent, father, or young parents, their children and families) per 1 social worker</p>												
<p>DAY CARE SERVICES*:</p> <p>Center-Based Care</p> <p>Family Day Care Homes</p>	<table border="0"> <thead> <tr> <th data-bbox="927 1413 1084 1434">Age of Child</th> <th data-bbox="1092 1413 1260 1434">Staff/Child Ratios</th> </tr> </thead> <tbody> <tr> <td data-bbox="927 1461 1003 1482">Under 3</td> <td data-bbox="1130 1461 1166 1482">1:3</td> </tr> <tr> <td data-bbox="927 1482 987 1503">3 to 4</td> <td data-bbox="1130 1482 1166 1503">1:7</td> </tr> <tr> <td data-bbox="927 1503 987 1524">4 to 5</td> <td data-bbox="1130 1503 1166 1524">1:8</td> </tr> <tr> <td data-bbox="927 1524 987 1545">5 to 6</td> <td data-bbox="1130 1524 1166 1545">1:9</td> </tr> <tr> <td data-bbox="927 1545 1003 1566">6 to 12</td> <td data-bbox="1130 1545 1166 1566">1:10</td> </tr> </tbody> </table> <p>Up to 5 children under 14 years of age, including the children of the day care provider, per home</p> <p>No more than two children under 2 years of age, including those of the day care provider, per home</p>	Age of Child	Staff/Child Ratios	Under 3	1:3	3 to 4	1:7	4 to 5	1:8	5 to 6	1:9	6 to 12	1:10
Age of Child	Staff/Child Ratios												
Under 3	1:3												
3 to 4	1:7												
4 to 5	1:8												
5 to 6	1:9												
6 to 12	1:10												
<p>IN-HOME AIDE SERVICES:</p> <p>In-Home Aides</p> <p>Social Work Staff Members</p>	<p>8 families per 1 aide</p> <p>17 active families per 1 social worker</p>												

AGENCY RESPONSE



**STATE OF MISSISSIPPI
DEPARTMENT OF HUMAN SERVICES**

KIRK FORDICE
GOVERNOR

July 20, 1992



Mr. John Turcotte
Executive Director
PEER Committee
222 North President Street
Jackson, Mississippi

Dear Mr. Turcotte:

This letter has been prepared as a response to the PEER draft document related to the 1992 review of the Office of Social Services of the Mississippi Department of Human Services, Division of Family and Children's Services. The document represents a true and nearly accurate chronicle of the areas for which I have had concern. What follows is a delineation of the corrective actions that I have initiated since coming into office on January 14, 1992. I take exception to only one statement and this is dealt with in the final paragraph.

DIVISION EFFECTIVENESS: Employment Standards and Training

Under the direction of the new administration, a dialogue toward validating employment standards for the Office of Social Services has been established with the State Personnel Board. On June 18, 1992, I met with Dr. Robinson to begin the process of developing validation of employment standards for social worker positions and a four-step career ladder. This meeting also enlisted the support of the State Personnel Board for the Social Services Certification Training Program provided by the University of Tennessee College of Social Work, Office of Research and Public Service. The program was designed to ensure that all new social services workers receive training early in their employment, to expand the total amount of training they receive, and to integrate training more effectively with job expectations and performance. In addition to improving the quality of practice, other goals are to instill in our social service workers confidence and pride in service, to encourage their professional development, and to enhance the credibility of our employees with other professionals in the community.

ADEQUACY OF STAFF RESOURCES:

In October 1991, the Office of Social Services instituted an intensive self-study directed by the Child Welfare League of America. The study is now complete and will be available in its final form in September. From the CWLA study, a strategic plan will be developed incorporating some of the findings from the PEER Review, as well as the CWLA study. This study includes, among many other things, a resource needs assessment, a study of 600 case files, and a staffing assessment.

MANAGEMENT INFORMATION:

On June 24, 1992, the Division of Management Information Systems, in conjunction with the Division of Family and Children's Services, began a needs assessment for automation of the Office of Social Services. The areas addressed in the follow-up memorandum dated June 26, 1992, are as follows:

"A. Foster Care and Adoption Process - A feasibility study will be conducted to determine the optimum approach to develop an automated system to track children from Foster Care through the Adoption process. The tracking system must be able to readily determine where the children are within the process; how they are being serviced; how long they have been in the system; placement and movement of the children; terminating parental rights (TPR); how many children are in TPR; how many children have gone through TPR and may be candidates for adoption; etc.

The study will also evaluate either enhancing or replacing the current mainframe Foster Care and Adoption System to incorporate these and other identified functions.

B. Alleged Child Abuse Tracking System - A detailed study will be conducted to determine the optimum solution for addressing the functionalities documented in the initial report prepared by MIS. The study will also explore electronic data submission alternatives, data capturing alternatives, and interfacing with MAVERICS.

MIS will evaluate the feasibility of implementing both short and long-term solutions for immediate relief and will be added into the FY 93 Plan. MIS will propose that Family and Children's Services enter into a contract with the CDPA Bureau of Systems Policy and Planning to immediately begin addressing one or more of these issues. Long-term solutions will focus on statewide system initiatives and will be included in the MIS Plan as one of many FY 94 projects."

The July 9, 1992 memo to CDPA Bureau of Systems Policy and Planning from MDHS MIS Planning and Analysis, which includes the work plan draft, documents the beginning of contractual discussions, "After reviewing your work plan and estimates...

I believe the next step is to submit a proposal to Shirley Anderson including..."

CARE OF CHILDREN IN CUSTODY OF THE STATE:

The Executive Director's office began working in March 23, 1992 in conjunction with Mississippi Association of Child Care Agencies Inc. (MACCA) and the Office of Social Services to develop a "Levels of Care System" for the children in our custody. This is a planning and policy development process to work toward establishment of an in-state "continuum of care" for children and youth that will include the following components:

- a levels of care system based on the service needs of children and a system of monitoring the levels of care provided in a child care facility/program that includes a definition for each of four levels of care, standards by which levels of care can be monitored and a monitoring process;
- a common application form for MDHS to use when placing children in out-of-home care that includes a placement instrument to assist in determining the appropriate level of care for the child;
- a child care facility/program cost report and database to assist MDHS in determining the cost of care for reimbursement for each level of care and the specific agency service cost. A range will be developed to take into account other funding resources utilized by specific child care facilities/programs.

Traditionally, MDHS has reimbursed child care providers based on facility, program type, individual agency contracts, and a minimal flat family foster care per diem. The levels of care system is being developed as a method of directly relating reimbursement to the needs of individual children and to promote the development of multiple levels of care within facilities, networks of agency services, and regional services in order to minimize the movement of children long distances as their care needs change.

Definitions of the Levels of Care:

The Standard Definitions of Levels of care identify and define four specific levels of care. For example:

- Level 1 care is provided in a family-type environment. Level 1 children require the availability of additional structure and guidance to meet the child's individual needs.

- Level 4 children have several major problems that require a highly structured treatment program including intensive therapeutic counseling and 24-hour supervision.

Monitoring Standards:

Uniform monitoring standards provide a standardized format for identifying the level programs or levels of care provided in individual child care facilities. Monitoring focuses on the quality of care. It builds on and complements agency licensing, certification and accreditation standards, but does not duplicate them.

An interagency process for monitoring the levels of care provided in child care facilities will be adopted by MDHS. The process includes:

- Completion of an agency application form by care providers using the definitions, standards, and a monitoring checklist to participate in the levels of care system. On-site monitoring by placing agencies can confirm self-reporting application.
- Development of a monitoring schedule for monitoring each facility which ensures that MDHS will conduct levels of care monitoring in conjunction with regularly scheduled visits to the facilities.
- A 12 month grace period given by MDHS to those agencies who are providing "quality" care to Level III and Level IV children and youth, but are not yet certified by the Department of Mental Health and/or COA or JCAHO accredited. (There may be other "high standard" certification/accreditation systems identified by MDHS that are comparable to certification by Mental Health and/or COA or JCAHO accreditation.)

Common Application:

The Common Application for Placement of Children in Out-of-Home Care provides information in a common format about children referred to placement.

Assessment of the Child's Needs:

The Behavior Rating Scale will be developed as an instrument that assesses the level of care required by children who must be placed residentially, a part of the Common Application. The scale is intended to provide caseworkers and caregivers an indication of the child's care needs. It is used to confirm professional judgment, not to replace it.

Cost Reporting Per Diem Setting Process:

Before each state fiscal year, MACCA will recommend to MDHS for their consideration a standard reimbursement rate for each level of care, as well as modifications to the levels of care system, if appropriate. It would be the goal to have the standard recommended rate based on the median cost of care for each level as determined from the child care facility cost reports submitted to MDHS by care providers, adjusted for inflation.

The standard recommended rates for fiscal year 1992/1993 are being developed.

REMAINING TASKS

Other possible tasks to be worked on by MACCA and MDHS are:

- development of a standard contract form for use by MDHS when contracting with out-of-home care providers;
- development of a fair and equitable process for transitioning children between levels of care;
- development of outcome measures to evaluate the effectiveness of out-of-home care providers in meeting the placement needs of children.

FINANCIAL MANAGEMENT:

190F and County Bookkeeping:

Those recommendations which MDHS can unilaterally direct will be implemented. We will work with the Board of Supervisors to establish an adequate working cash balance in the Social Services bank account in Rankin County.

Medicaid Procedures:

On May 29, 1992, the Office of the Executive Director and the Office of Social Services initiated discussions with Medicaid to establish a protocol for Social Workers to register children for Medicaid eligibility as soon as possible.

And, finally, the review draft stated that the former director of the Division of Family and Children's Services was "terminated without notice and no stated reason." As the PEER Committee knows, the Executive Director can make no public statement as to the cause of termination.

Sincerely,

Sue Hathorn

Sue Hathorn
Executive Director

PEER Staff

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