



County of San Diego

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July 24, 2019

RECEIVED
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The Honorable Peter C. Deddeh
Presiding Judge, San Diego Superior Court
220 West Broadway
San Diego, CA 92101

Dear Judge Deddeh,

The 2018-2019 San Diego County Grand Jury recently completed its term and filed five reports with recommendations requiring a response from the County of San Diego. On July 23, 2019, the County Board of Supervisors approved responses to these five reports and directed me to forward the responses to your office, as required by the California Penal Code.

The responses, which are enclosed, correspond to the following reports:

- San Diego Psychiatric Services Tri-City's Shutdown of Psych Units...Tip of the Iceberg
- San Diego County Detention Facilities Inspection Report and Inmate Mental Health
- Compensation of San Diego County Board of Supervisors
- Human Trafficking San Diego Needs Essential Services
- Promoting Quality Foster Care in San Diego County Who Protects Our Most Vulnerable Children?

I thank the Grand Jury for their commitment to this process. If you have questions or need additional information, please contact me at (619) 531-5250.

Sincerely,

HELEN N. ROBBINS-MEYER
Chief Administrative Officer

Attachment

cc: Board of Supervisors

**COUNTY OF SAN DIEGO RESPONSES
TO
2018-2019 GRAND JURY REPORTS**

San Diego Psychiatric Services Tri-City's Shutdown of Psych Units...Tip of the Iceberg	Page 1
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**COUNTY OF SAN DIEGO RESPONSE TO 2018-19 GRAND JURY REPORT
"San Diego Psychiatric Services Tri-City's Shutdown of Psych Units...Tip of the Iceberg"
Filed May 22, 2019**

FINDINGS

Finding 01: San Diego County needs additional step-down beds.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Current patterns of utilization, including overuse of emergency departments, has led to pressure across the behavioral health crisis system that would be alleviated with additional step-down beds. Step-down beds, step-down facilities, and lower levels of care all refer to appropriate care for patients who are transitioning out of an inpatient psychiatric setting, once the immediate crisis has passed and treatment can seamlessly continue in a more therapeutic environment. Examples of step-down settings may include crisis residential treatment facilities, skilled nursing facilities and board and care facilities.

By changing the regional approach from a "behavioral health crisis system" to a "chronic illness management system"—the latter which includes enhanced care coordination across providers and plans and early intervention—long term capacity shortages would be addressed.

Finding 02: San Diego County needs to reduce its Administrative Days to reduce costs associated with post-acute care patients.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. It is prudent to ensure patients are in the most appropriate level of care and that care costs align with their needs. Unnecessary administrative day costs can occur when a patient remains in a setting that delivers high-intensity services when transfer to a lower level of care is not available and discharge back to home or community is not appropriate.

Finding 03: If BHS invests in additional step-down facilities, it creates an opportunity to reduce Administrative Days.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Additional step-down facilities could create opportunities to reduce administrative days however this is not the only answer. Developing other services,

especially lower intensity outpatient services, offers a connection to ongoing support which may prevent individuals from entering an inpatient setting to begin with, thus supporting the broader goal of chronic illness management as noted in the response to Finding 01.

The County of San Diego remains committed to building upon existing work to expand long-term residential bed capacity, with concrete plans to add more beds, which allows individuals to move to a lower level of care when appropriate. These critical steps, along with broader planning across the continuum of care, all create opportunities to reduce administrative days.

Finding 04: There are facilities within San Diego County that purposely limit their psychiatric beds to 16 to comply with the Medi-Cal IMD Exclusion.

Response: **The County of San Diego Chief Administrative Officer disagrees with this finding.** To the County of San Diego's knowledge, there is no evidence to suggest that facilities are limiting their psychiatric beds to 16 to comply with the Medi-Cal IMD exclusion. Also, where facilities are part of general acute care hospitals the IMD exclusion would generally not apply.

Finding 05: Public/private partnerships and Joint Power agreements with County psychiatric facilities could reduce the requirements of the Medi-Cal IMD Exclusion.

Response: **Response: The County of San Diego Chief Administrative Officer agrees with this finding.** As opportunities arise, the County of San Diego is willing to explore options that enhance service delivery which may include public/private partnerships and Joint Power agreements.

Finding 06: While maintaining minimal staffing requirements, workforce recruitment and retention within County administered health facilities are an ongoing challenge.

Response: **Response: The County of San Diego Chief Administrative Officer agrees with this finding.** The County of San Diego is building upon current efforts and is actively developing best practices to address behavioral health workforce recruitment and retention.

Existing Workforce Education and Training efforts are conducted through several County of San Diego Health and Human Services Agency, Behavioral Health Services (BHS) programs and are broken down into the following five strategies:

1. Workforce Staffing Support
2. Training and Technical Assistance
3. Mental Health Career Pathway Programs
4. Residency and Internship Programs
5. Financial Incentive Programs

Additionally, the development of a department-wide strategic plan for the behavioral health workforce will be drafted and routed for stakeholder input as appropriate by the BHS Clinical Design Office within the next six months.

A collaboration with University of California, San Diego (UCSD) also reflects the County of San Diego's commitment to this high-priority need. Specifically, the County contracts with UCSD to provide the Community Psychiatry Program. This program gives medical residents the opportunity to have increased interaction with patients in the public mental health sector. Psychiatric mental health nurse practitioner (PMHNP) trainees work side-by-side with these residents throughout the entire program. This collaboration is intended to prepare future behavioral health workforce professionals to better understand patient care for those with mental health conditions.

Finding 07: Workforce turnover may have a direct negative impact on the quality of care due to lack of continuity and broken staff/patient relationships that have been developed over time.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Nationally, workforce turnover in the behavioral health field is a significant issue—and the San Diego region is no exception.

The County of San Diego Health and Human Services Agency, Behavioral Health Services continues to advance comprehensive Workforce Education and Training strategies, fully described in the response to Finding 06, which are intended to incentivize, train and support future behavioral health workforce professionals with a goal of workforce retention.

Finding 08: *Public Consulting Group* has been selected to provide quarterly reports on the follow-up actions of the Board's newly formed collaboration, "Caring for People in Psychiatric Crisis in San Diego County."

Response: The County of San Diego Chief Administrative Officer agrees with this finding. *Public Consulting Group* was awarded a contract to conduct a thorough review of the full continuum of behavioral health care services in San Diego County. The San Diego County Board of Supervisors requested quarterly updates on local developments related to the efforts to address "Caring for People in Psychiatric Crisis in San Diego County." The County of San Diego Health and Human Services Agency, Behavioral Health Services, in consultation with *Public Consulting Group*, provides these updates. To date, public updates to the Board of Supervisors occurred on March 26, 2019 and June 25, 2019.

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that the Chief Administrative Officer for the County of San Diego:

19-12: Evaluate steps that could be taken to reduce the number of administrative days.

Response: This recommendation has been implemented. In December 2018, the San Diego County Board of Supervisors directed the County of San Diego Health and Human Services Agency to lead an effort, supported by Public Consulting Group, to conduct a thorough review of the full continuum of behavioral health care services. Building upon existing work, this focused evaluation effort is occurring in the context of a need for emergency and inpatient psychiatric care throughout San Diego County. This need was

exacerbated by the closure of Tri-City Medical Center's inpatient and crisis stabilization units in fall 2018.

Four behavioral health priority areas are included in this effort:

- Prevention and early intervention strategy;
- Care coordination among and between sectors (i.e. public safety, social services, healthcare, consumers, families, etc.);
- "Front end" services to include non-emergency crisis stabilization, urgent care, and withdrawal management; and
- "Back end" services to include long-term care, step-down beds, and board and care services.

The evaluation of the utilization of inpatient hospital services and the evaluation of steps to reduce the number of administrative days are included in this effort.

19-13: Evaluate potential contract management and collaboration opportunities that could be used to increase the number of psych beds within the County.

Response: This recommendation has been implemented. Through the effort described in the response to 19-12, the County of San Diego (County) is evaluating potential contract management and collaboration opportunities that could be used to not only increase inpatient psychiatric bed capacity, as appropriate, but to also increase much-needed lower levels of care which can occur in an outpatient or inpatient setting.

Examples of inpatient lower levels of care offered through the County include:

1. Adult Residential Facilities provide services in a home-like residential setting to individuals with mental illness who require psychiatric treatment and psycho/social rehabilitative services,
2. Long-term residential care facilities include services in the following settings: skilled nursing facilities (SNF), board and care facilities and institutions for mental disease (mental health rehabilitations center, SNF/special treatment programs), and
3. Edgemoor Distinct Part Skilled Nursing Facility provides 24-hour, long-term skilled nursing care for individuals having complex medical needs who require specialized interventions from highly trained staff.

Inpatient psychiatric beds are designed for the worst crises, for a short duration when there is real fear of suicide or harm being caused to others. The effort to improve the entire behavioral health system also builds upon the County of San Diego Health and Human Services Agency's existing and ongoing efforts over the past four years to expand beds within lower levels of care which transition patients when the immediate crisis has passed, and treatment can seamlessly continue in a more therapeutic environment.

19-14: Develop long-term best practices for addressing the behavioral health workforce shortage for recruiting, hiring, and retaining qualified clinical staff across the behavioral health continuum.

Response: This recommendation will be implemented. The County of San Diego is building upon current efforts and is actively developing best practices to address the behavioral health workforce shortage.

Existing Workforce Education and Training efforts are ongoing and conducted through several Health and Human Services Agency, Behavioral Health Services (BHS) programs and are broken down into the following five strategies:

1. Workforce Staffing Support
2. Training and Technical Assistance
3. Mental Health Career Pathway Programs
4. Residency and Internship Programs
5. Financial Incentive Programs

Additionally, the development of a department-wide strategic plan for the behavioral health workforce will be drafted and routed for stakeholder input as appropriate by the BHS Clinical Design Office within the next six months.

A collaboration with University of California, San Diego (UCSD) also reflects the County's commitment to this high-priority need. Specifically, the County contracts with UCSD to provide the Community Psychiatry Program. This program gives medical residents the opportunity to have increased interaction with patients in the public mental health sector.

Psychiatric mental health nurse practitioner (PMHNP) trainees work side-by-side with these residents throughout the entire program. This collaboration is intended to prepare future behavioral health workforce professionals to better understand patient care for those with mental health conditions.

COUNTY OF SAN DIEGO RESPONSE TO 2018-19 GRAND JURY REPORT
“San Diego County Detention Facilities Inspection Report and Inmate Mental Health”
Filed May 28, 2019

(The Sheriff's department will respond separately to the findings and recommendations in this report.)

FINDINGS

Finding 04: Several detention facilities, both adult and juvenile, are located at Otay Mesa, an isolated area which is difficult for families of inmates to visit.

Response: The San Diego County Probation Department agrees with this finding.

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that the San Diego County Probation Department:

19-23: Study and consider transportation options for family visitation to the Otay Mesa detention facilities.

Response: The recommendation requires further analysis. The Probation Department supports family visitation at all facilities. Hours for visitation were expanded in 2018 and

authorized visitors now include extended family and any supportive individual approved by the department. The East Mesa Juvenile Detention Facility additionally provides virtual visitation to allow families alternative methods to visit with youth. A Probation Department community partner, the San Diego Second Chance Program, provides transportation assistance to the families of youth committed to custody at East Mesa Juvenile Detention Facility. The Probation Department and San Diego County Office of Education have provided transportation for families for recognized holiday events in which youth share a meal with family. The Probation Department is open to further review of transportation options and will, by November 1, 2019, consider additional transportation options that may support visitation opportunities at East Mesa Juvenile Detention Facility.

COUNTY OF SAN DIEGO RESPONSE TO 2018-19 GRAND JURY REPORT
“Compensation of San Diego County Board of Supervisors”
Filed May 29, 2019

FINDINGS

Finding 01: Elected officials who set their own compensation and pensions may have an inherent conflict of interest.

Response: The County of San Diego Chief Administrative Officer disagrees with this finding. The law requires certain elected officials to set their salaries therefore it is not an inherent conflict of interest in the legal sense of the term.

Finding 02: A charter amendment to limit the ability of elected officials to set their own compensation would eliminate any perception of a conflict of interest.

Response: The County of San Diego Chief Administrative Officer disagrees with this finding. It is not possible to conclude perceptions of a conflict of interest will be eliminated by a charter amendment.

Finding 03: A charter amendment would give voters the ability to influence the compensation of their elected officials.

Response: The County of San Diego Chief Administrative Officer agrees with this finding.

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that the San Diego County Board of Supervisors

19-24: Consider placing on an upcoming ballot an amendment to Section 402 of the County Charter which would incorporate one of the following options for setting County Supervisors' compensation (exclusive of possible cost of living increases):

Option A: Add a sentence, requiring that any proposed ordinance changing the formula used to determine supervisor salaries, must be submitted by the Board to the people for enactment by popular vote, under Elections Code Section 9140.

Option B: Add a sentence requiring that any enacted ordinance changing the formula used to determine supervisor salaries be subject to repeal by referendum, under Elections Code Sections 9144-9145.

Option C: Delete the current language in Section 402 and replace it with language which would fix the supervisors' salaries at 90% of the salary of Superior Court judges.

Response: The Board of Supervisors will consider this recommendation.

**COUNTY OF SAN DIEGO RESPONSE TO 2018-19 GRAND JURY REPORT
"Human Trafficking - San Diego Needs Essential Services"
Filed May 30, 2019**

(The District Attorney will respond separately to the findings and recommendations in this report.)

FINDINGS

Finding 01: Despite the recommendations made in the 2014 CSEC Advisory Council report, there is still a critical shortage of beds for both adult and juvenile human trafficking victims in San Diego.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding to the extent that the County of San Diego does not have comprehensive information regarding adult beds for human trafficking victims. Although the County of San Diego (County) has an accurate count of youth-dedicated beds for human trafficking victims, comprehensive information regarding the housing needs for adult human trafficking victims is not available to the County at this time. Housing services for adult human trafficking victims are managed by an independent network of community providers.

There is currently an effort underway to increase the number of dedicated juvenile Commercial Sexual Exploitation of Children (CSEC) beds in San Diego County. Since 2014, the County has dedicated 38 beds for CSEC youth through existing programs such as Casa de Amparo, which is licensed as a Short Term Residential Therapeutic Program (STRTP). In addition, there are two other STRTP applicants: The Refuge and Tiffany's Place which are awaiting licensing approval by the California Department of Social Services (CDSS) and Community Care Licensing (CCL). If they are approved, they will offer a total of 12 CSEC-dedicated beds. This would bring a total of 50 beds dedicated for CSEC victims into San Diego County.

Further, per Continuum of Care Reform, all STRTPs indicate in their Program Statements that they will be able to serve all youth, including CSEC youth. The County of San Diego contracts with 11 providers, who provide an additional 328 beds for youth with higher needs, including CSEC youth. These, in addition to the 50 CSEC-dedicated beds, will meet the bed needs for local juvenile human trafficking victims.

Because each child and each case is unique, it is hard to estimate if all youth who are victims of human trafficking require a STRTP bed; however, all children active to the child welfare system in need of placement will be placed based on their needs. It is important to note that youth may require one of two types of placement: a STRTP or Resource Family Home. Specialized placement units and Child Welfare staff, along with caregivers, parents, and service providers, work together throughout a youth's case regarding case planning, placement, and other case-related topics.

Finding 02: Many victims of human trafficking fall within the broad definitions of homelessness and mental illness and should qualify for funding under Proposition 2.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Because many victims of human trafficking are homeless, at-risk of homelessness, or have a mental health issue, they are eligible for many services available for this population. The Behavioral Health system of care provides services for persons with serious mental illness who may be homeless or at risk of homelessness under Proposition 2 guidelines; therefore, victims of human trafficking may be eligible for services under No Place Like Home.

Finding 03: SB 1193, requiring businesses to display human trafficking posters, is not being enforced in many areas of San Diego County.

Response: The County of San Diego Chief Administrative Officer agrees with this finding.

Finding 04: There is a positive correlation between foster care placement and CSEC susceptibility.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Data shows that many CSEC youth were involved in the child welfare system. Since 2016, the California Department of Social Services (CDSS) has collected information on six types of CSEC involvement: At Risk, Victim Before Care, Victim During Care, Victim in Open Case not in Foster Care, Victim While Absent from Placement, and Victim with Closed Case Receiving Independent Living Services. The types of Commercial Sexual Exploitation (CSE) involvement assist counties and the CDSS to deepen their understanding of when a youth became a victim of CSE to design programs for prevention and intervention to better serve foster youth. Currently, in the third quarter of FY 2018-19, child welfare data in San Diego County shows that three cases identified youth as becoming involved in CSE during care, while 11 were victims before care and 73 youth were at risk for CSE.

Finding 05: Training for current and prospective foster parents/resource families does not include a mandatory module in CSEC recognition signs, based on the CSEC 101 training syllabus.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. The Foster Adoptive Kinship and Caregiver Education program provides workshops, support groups and classes that assist foster, adoptive and kinship parents to be informed and prepared to meet the youth's needs. The Foster Adoptive Kinship and Caregiver Education program offers CSEC 101, a 3-hour

CSEC training for current and prospective foster parents/resource families, in English and Spanish. However, this training is not mandatory.

By November 30, 2019, the County of San Diego Health and Human Services Agency, Child Welfare Services (CWS) will conduct an analysis of available CSEC trainings for prospective foster parents/resource families and explore options to implement advanced CSEC training which could be facilitated by the Foster Adoptive Kinship and Caregiver Education program or other community-based program.

CWS will seek guidance from the State, explore amendments to applicable contracts, and pursue necessary policy changes regarding mandating the CSEC training for all foster parents/resource families.

Finding 06: The RISE Court can be a significant step in transforming a victim, or potential victim, of human trafficking into a survivor.

Response: The County of San Diego Chief Administrative Officer agrees with this finding.

Finding 07: Having its own budget and performance outcome measurements would give the RISE Court and its participants a greater sense of sustainability.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. The RISE Court currently has performance outcome metrics and identified resources to support sustainability. The RISE Court currently measures performance. The County will consider whether additional information on youth characteristics and youth experience in the program might provide more information to demonstrate and support youth success in the program. The RISE Court receive resources from several County agencies who continue to allocate staff and other resources to the RISE Court, as they do for the many activities and programs that involve multiple departments. Within the Probation Department, the RISE Court additionally has a dedicated budget to fund support services for youth and to fund the transportation needs of youth and families.

Finding 08: Federal and State grant funding is available for housing and service programs for human trafficking victims.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Grant opportunities are available to local jurisdictions to support victims of crime, some of which include funding for housing and services. The County has applied for and received funding in the past.

In addition, the County of San Diego Health and Human Services Agency, Child Welfare Services (CWS) receives federal and state funding for housing and service programs for human trafficking victims. However, only children/youth and their parent(s)/caregiver(s) with active CWS cases are eligible to receive this type of funding.

Finding 09: A CSEC Advisory Council section on the County website would make its work more transparent and increase its ability to share data with similar agencies other counties.

Response: The County of San Diego Chief Administrative Officer agrees with this finding.

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that the Chief Administrative Officer for the County of San Diego:

19-25: Consider evaluating whether legislation equivalent to AB 1730 could be reintroduced to the State Legislature. This would provide funding for a pilot program that provides services and housing for victims of human trafficking.

Response: The recommendation requires further analysis. The County's Office of Strategy and Intergovernmental Affairs (OSIA) reviews federal and state legislation and advocates on behalf of the County on legislation that may have an operational or financial impact to the County. Authority to advocate is provided by the County Legislative Program, Board of Supervisor Policies and specific Board direction. Annually, OSIA reviews and recommends edits to the County Legislative Program, which consists of three components: sponsorship proposals, priorities and policy guidelines. Staff will consider evaluating whether legislation equivalent to AB 1730 should be reintroduced to the State Legislature by sponsorship proposal in future years. In addition, staff will recommend amending the County Legislative Program to prioritize support of legislation seeking to provide services and housing for victims of human trafficking. The County Legislative Program will be presented to the Board of Supervisors for approval this December 2019. Staff recommendations are subject to Board approval.

19-26: Consider a collaboration that could develop multiple model/shelter programs in anticipation of grant opportunities and other local, state or federal funding which may become available.

Response: The recommendation requires further analysis. Currently, multiple departments within County of San Diego Health and Human Services Agency (HHSA) collaborate on a variety of housing programs including Project One for All, Bringing Families Home, and Victims of Crime Act housing assistance. These programs serve a variety of vulnerable persons including those with a serious mental illness, families engaged with the child welfare system, and victims of crime. These programs also represent interventions throughout the continuum of housing needs (from emergency to permanent housing).

To best develop and implement housing ("shelter") program models specific for human trafficking victims, it is essential to understand the housing needs, services and delivery model best suited for this population. Moving forward, in anticipation of future funding opportunities that may become available, the County will conduct an analysis to develop a general framework of housing interventions, models and/or approaches that may best serve human trafficking victims by November 30, 2019. The County will also explore the potential of a collaborative effort for existing shelter/housing programs. Based on the outcome of the analysis, the County of San

Diego will collaborate with the appropriate community partners to create an application readiness plan complete with descriptions and narratives from the various partners.

19-27: Consider evaluating whether human trafficking victims fall within the definitions of “homeless” and “mental health” so that Mental Health Services Act funds can be used in housing programs for human trafficking victims.

Response: The recommendation has been implemented. This is current practice. The County of San Diego Health and Human Services Agency, Behavioral Health Services’ system of care provides services for persons with serious mental illness who may be homeless or at risk of homelessness under Mental Health Services Act (MHSA) guidelines, therefore victims of human trafficking may be eligible for services under MHSA.

19-28: In conjunction with the Office of the District Attorney, consider taking steps to ensure coordination of efforts to ensure a method for enforcement of SB 1193.

Response: The recommendation has not been implemented but will be implemented in the future. The Chief Administrative Officer, working through the County departments which participate in the Commercial Sexual Exploitation of Children (CSEC) Steering Committee and San Diego County Regional Human Trafficking and Commercial Sexual Exploitation of Children Advisory Council, including the Sheriff’s Department and the Office of the District Attorney, will consider providing additional outreach and educational activities to inform businesses of their obligations pursuant to SB 1193. The Committee, the Council and the Office of the District Attorney will continue outreach coordination through a working group including the hotel/motel industry. The working group will develop an action plan containing further steps by November 30, 2019.

19-29: Consider establishing separate pro-rated funding for the RISE Court, for the County agencies participating in the program.

Response: The recommendation will not be implemented because it is not warranted. The County of San Diego RISE Court is a collaborative, engaged, and trauma-informed court that uses a multidisciplinary approach to address the needs of youth who may have a history of, or may be at risk for commercial sexual exploitation. RISE stands for Resiliency Is Strength and Empowerment. RISE Court aims to engage and support youth and their families to achieve their full potential by using the positive youth development framework. The RISE Court is supported by several County agencies and those agencies allocate staff and other resources to the RISE Court, as they do for the many activities and programs that involve multiple departments. For example, the Probation Department allocates four full time staff to the program along with an allocation of \$120,000 over two fiscal years for materials, services and activities for youth in the program, and to provide transportation resources to youth and families.

19-30: Consider taking steps to establish a process to develop performance indicators for the RISE Court.

Response: The recommendation requires further analysis. The RISE Court currently monitors performance. The County currently tracks whether youth complete the program successfully. The District Attorney's Office completed an annual report on RISE Court for 2017-2018. The County will consider whether additional information on youth characteristics and youth experience in the program could support youth success in the program. By November 30, 2019, the County agencies participating in the RISE Court will consider whether additional performance indicators will be developed and how they will be monitored.

19-31: Consider evaluating ways to provide transportation to the RISE Court to facilitate attendance for participants.

Response: The recommendation has been implemented. The Probation Department currently has allocated resources to support the transportation needs of youth and families. Youth and caregivers are provided with bus passes, gas cards, and resources for ride-sharing options. Community providers also provide transportation. Additionally, the RISE unit of the Probation Department acquired a van in June 2019 to assist with the transportation of youth to events.

19-32: Consider evaluating the feasibility of requiring elementary training in CSEC for all current and prospective foster parents/resource families and advance training in CSEC for foster parents/resource families having custody of a CSEC or at-risk child.

Response: This recommendation has not yet been implemented but will be implemented within six months. The Foster, Adoptive, Kinship and Caregiver Education program provides workshops support groups and classes that assist foster, adoptive and kinship parents to be informed and prepared to meet the youth's needs. The Foster, Adoptive, Kinship and Caregiver Education program offers CSEC 101, 3-hour CSEC training for current and prospective foster parents/resource families, in English and Spanish. However, this training is not mandatory.

By November 30, 2019, the County of San Diego Health and Human Services Agency, Child Welfare Services (CWS) will conduct an analysis of available CSEC trainings for prospective foster parents/resource families and explore options to implement advanced CSEC training which could be facilitated by Foster Adoptive Kinship and Caregiver Education or other community-based program. CWS will seek guidance from the State, explore amendments to applicable contracts, and pursue necessary policy changes regarding mandating the CSEC training for all foster parents/resource families.

19-33: Consider determining whether the San Diego County Regional Human Trafficking and Commercial Sexual Exploitation of Children Advisory Council should have a page added to the County's website. This would increase transparency of the Council by including agendas, minutes, and relevant reports.

Response: The recommendation has not been implemented but will be implemented within six months. The San Diego Regional Human Trafficking

and Commercial Sexual Exploitation of Children Advisory Council has discussed establishing a website. County staff will work with the District Attorney and Advisory Council members to establish a webpage with agendas, minutes, and other content and to identify resources for maintaining the site. A plan for the site's content and its maintenance will be completed by November 30, 2019. Additionally, County staff will add the Advisory Council to the registry of current County boards, commissions and committees by November 30, 2019.

COUNTY OF SAN DIEGO RESPONSE TO 2018-19 GRAND JURY REPORT
“Promoting Quality Foster Care in San Diego County Who Protects Our Most Vulnerable Children?”
Filed June 12, 2019

FINDINGS

Finding 01: Social workers spend approximately half of their time on documentation and half of their time with the children and parents.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. Written documentation is a critical task of Child Welfare Services' (CWS) Protective Services Workers (PSWs) which may reasonably take a significant portion of their time. PSW's must document all phone calls, in-person visits, and other communication they have with children/youth, parents, caregivers, attorneys, service providers, and others involved in the case. They must provide the Juvenile Court and parties to these proceedings with detailed and sufficient factual information to make findings and orders involving children and families. Also, this documentation is required pursuant to federal and State laws, regulations and guidelines.

The California Department of Social Services' Support Team for the Child Welfare Services Case Management System (CWS/CMS)—the required statewide database for child welfare automated case management, services planning, and information gathering—conducts an annual survey which assists in determining the percentage of time that each staff uses CWS/CMS per day. The survey includes questions regarding the amount of time self-reported by staff spent on the computer on a particular day. Of the 30% of staff who responded to the survey, all reported spending more than 50% of their time on the computer.

However, there is no concrete data on the exact breakdown of other time spent performing job duties. It is for that reason, that we are unable to fully agree or disagree with this finding. CWS is analyzing the impact of following the Structured Decision Making (SDM) contact guidelines which would increase the number of visits workers have with families each month based on the risk level of the family, as referenced in the County of San Diego's response to the CWS Review Working Group Recommendations.

Finding 02: On average, 12 children need out-of-home placement each day in San Diego County due to abuse and neglect.

Response: The County of San Diego Chief Administrative Officer disagrees with this finding. Over the last 12 months (June 2018 - May 2019), Child Welfare Services (CWS) placed an average of 4 children in protective custody each day (1,438 total). Given that CWS investigates reports of abuse and neglect for over 43,000 children annually, this is a very low number who need protective custody. San Diego County has one of the lowest rates of entry into foster care in the state, with a rate of 1.7 per 1,000 children entering foster care in San Diego County compared to the statewide average of 3.0 per 1,000 children.

Finding 03: Of the approximately 2,100 children in foster care, 20% of group home children were reported to be abused in their foster home. Most complaints involved physical abuse and/or neglect.

Response: The County of San Diego Chief Administrative Officer disagrees with this finding. There were 341 children in a group home placement at any given time in 2018, and 7% (24) of the 341 youth had referrals generated on their behalf. Of the 24 that had referrals, 8% (2) were substantiated, which is less than 1% of the total number of children in a group home placement. One was an allegation of 'General Neglect' and the other was for 'Sexual Abuse'. Upon further review of these two cases, it appears that the abuse occurred outside of foster care and one was miscoded due to the state-wide issue identified below in Finding 04. In 2018, no children in a group home placement had substantiated allegations of maltreatment that occurred at the hands of their caregivers.

Finding 04: The County of San Diego's 985 instances of substantiated maltreatment in foster care were similar to the State of California averages for the same time periods.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Between 2008-2019, there were 985 instances of substantiated maltreatment in foster care in San Diego County, which is an average of 98 instances of substantiated maltreatment per year, according to the UC Berkeley analysis of data reported to the State by counties. The State of California averaged 1,751 instances per year in the same period. To better compare maltreatment in foster care, rates are often used instead of counts because they allow for comparison between county and State (or national) over time. The average rate of maltreatment in foster care per 100,000 days for the County of San Diego was 8.8 and the State was higher at 9.5 between 2008-2019. The County of San Diego has seen a steady decrease in the number of substantiated maltreatment incidents for children in foster care and a decrease in the rate overall.

In addition, per an All County Letter issued by the State in 2017, a coding error that occurred in the statewide database may have artificially inflated the maltreatment in foster care rate. This could occur if there was no date entered into the "Occurrence field" when the actual date of abuse was unknown.

Per the State letter:

“When these fields are left blank, the Maltreatment in Foster Care measure interprets the referral date itself as the abuse or neglect incident date. As the referral date does not often reflect the actual date that the abuse and/or neglect occurred, this practice can lead to inaccurate Maltreatment in Foster Care data for children placed in out-of-home care. For example, if a child recently placed in foster or relative care discloses a previously unknown incident of abuse/neglect by a parent that occurred prior to the removal date, the Maltreatment in Foster Care measure will count the abuse/neglect incident as having occurred in out-of-home care unless the correct ‘Occurrence Information’ date is entered in the resulting referral.”

Finding 05: San Diego County social workers often feel overwhelmed with the number of monitored children. With AB 403, the increased need for administrative documentation reduces the time a social worker can spend with a foster child/family.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. Child welfare is a strenuous field in which workers make critical decisions about the safety of children on a daily basis and are exposed to traumatic events through their interactions with families. It is not clear, however, that the feeling of being overwhelmed is solely due to the number of monitored children or that AB 403 reduces the amount of time a worker spends with a child and/or their family.

AB 403, also known as the Continuum of Care Reform Act, sets forth a comprehensive framework which supports children, youth and families across placement settings in achieving permanency. There are increased demands on social workers as a result of AB403 to have more Child and Family Team meetings and increase support for resource families so that children/youth can remain in a family-like setting when possible. The added efforts per the requirements of AB403 will ultimately increase child well-being and support positive outcomes by reducing the length of time to achieve permanency, identifying and establishing core services and supports to meet the family and youth’s unique needs, and reducing the number of youth in congregate care.

Regardless, Child Welfare Services (CWS) prioritizes the wellbeing of its staff and has been actively working to address feelings of being overwhelmed. CWS is in the process of hiring additional staff psychologists to provide more support to staff and reduce the impact of exposure to secondary trauma, as referenced in the County of San Diego’s response to the CWS Review Working Group Recommendations. In addition, CWS is adding 125 new positions, which will help to reduce workload.

Finding 06: CWS management and staff, in all units, need reduced workload sizes.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. The California Department of Social Services (CDSS) recommended caseloads are listed below as is the County of San Diego’s data from Fiscal Year 2018-2019. The third column is the County of San Diego’s (County) identified optimal caseloads based on its own internal study. As the data shows, the County’s standard as well as its compliance far exceeds State recommendations.

CDSS Caseload Recommendation		2018/2019 Fiscal Year CWS Caseloads		County's Identified Optimal Caseloads	
Unit	Cases Per Worker	Unit	Cases per Workers	Unit	Cases Per Worker
Emergency Response	15.8	Emergency Response	10.3	Emergency Response	9.88
Family Maintenance	34.97	Continuing Services (Maintenance and Family Reunification)	15.9	Continuing Services (Family Maintenance and Family Reunification)	11.05
Family Reunification	27	Adoptions (Permanency Planning)	16.9	Adoptions (Permanency Planning)	16.42
Permanency Planning	54				

While the CDSS recommended caseload sizes separate Family Maintenance and Family Reunification, San Diego does not assign cases this way. CWS workers in Continuing Services carry a mixture of Family Reunification, Family Maintenance, and some Permanency Planning cases. When a child reunifies with their family, the family moves from a Family Reunification case to a Family Maintenance case. It is better for the family if they can keep the same social worker who knows them, is familiar with the case, and already has an established relationship with the family, rather than starting over with a new social worker at a critical time when the family is re-establishing itself with the children now back in the home.

The San Diego County Board of Supervisors adopted the fiscal year 2019-2020 budget on June 25, 2019 (17), which includes 125 new positions for CWS. These positions will help further decrease caseload sizes, enhance supervisory skills, and improve the quality of practice. Adding positions to Child Welfare Services (CWS) will help get closer to the County's optimal caseload standards.

As referenced in the County of San Diego's response to the CWS Review Working Group Recommendations, to assure that the workload in all units is manageable, CWS is undergoing a WorkWellSD task management processes. The WorkWellSD task management processes were developed to optimize service delivery by using technology to map and standardize business processes, manage task assignments and enhance data collection. The overall goal of this process will be to improve staff efficiency and further decrease caseloads.

Finding 07: Some foster families do not feel they have enough contact with their social worker. There are families that feel a lack of communication with CWS workers.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. While some foster parents report that they do not feel they have enough contact or communication with their Child Welfare Services (CWS) worker, there are federal and State laws and regulations that mandate regular contact and communication between foster parents and social workers to ensure the child's well-being. The federal Child and Family Services Improvement Act of 2006 (CFSIA, P.L. 109-288) was enacted to improve the well-being of all children in the child welfare system. Among other things, it requires social workers to visit all children placed out-of-home at least once per month, with the majority of those visits taking place in the child's placement. As such, social workers for the County of San Diego are required to have monthly contact with the children assigned to them. Over the past five years, staff achieve this expectation over 97% of the time, exceeding the federal expectation of 95%. In addition, over 68% of those visits occur in the home of the caregivers.

Further, social workers follow the State's Division 31 regulations (31-330) when a child is in an out-of-home placement. Per this regulation, the following is required, which occurs through regular communication with caregivers:

- Monitor and assess the quality of care provided including the location and safety of the child and the ability of the out of home care provider to meet the child's basic and special needs, if any (e.g. health and educational needs).
- Establish and maintain mutually cooperative relationship between the social worker, parents and the out-of-home care provider.
- Counsel the child, parents, out-of-home care provider as to progress of the case.

In addition to adhering to the legal requirements, CWS provides additional opportunities for caregivers to increase their contact with CWS staff, including:

- Contact through the Quality Parenting Initiative (QPI) ambassadors who assist with addressing issues around placement
- Optional partnering with QPI mentors
- Attending the Foster Care Services Committee, a public meeting
- Participating in Child and Family Team meetings, which are held at regular decision points in the case to allow the voice of the child, family and caregivers to be heard
- Participating in Juvenile Court proceedings

Finding 08: All foster children caregivers need parent training, respite care or other supportive services.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. All foster children caregivers benefit from foster care parent training, respite care or other supportive services. Child Welfare Services (CWS) currently provides a number of supportive options for caregivers including:

- Resource parent support groups which are voluntary monthly support groups led by experienced caregivers, which provide training and support.

- Respite care service hours that can be utilized by caregivers for pre-scheduled or emergency medical appointments, attending resource parent support group meetings, required trainings and/or for stress alleviation.
- A required minimum of 8 hours of trainings per year, after the initial 12 hours of training required to obtain Resource Family Approval certification.
- County of San Diego approved mentors who provide support to caregivers who have questions about the approval process or need ongoing guidance. Through a partnership with Grossmont College, there are currently 9 mentors providing this voluntary support to new and existing caregivers. Consideration is being given to add additional mentors.

Every month, the current trainings offered are reviewed to adjust the schedules and topics based on the needs of the caregiver community.

In addition, the California State Legislature provided funding for the Family Urgent Response System (FURS), a 24/7 coordinated system designed to provide timely, in-home, in-person response to resource families and current/former foster youth for purposes of stabilizing the living situation by linking the caregiver and youth to supportive services. The County San Diego will work with the California Department of Social Services to implement this legislation, which will provide additional support services to resource families.

Finding 09: Abuse and neglect may be reduced through enhanced screening/training of prospective non-relative and kinship foster parents.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. In January of 2017, California improved the process of screening and training prospective resource families (kin and non-relative) by implementing a unified caregiver approval process called the Resource Family Approval (RFA) process. The RFA process is mandated by the California Department of Social Services (CDSS) and all applicants must comply with RFA process. RFA entails additional screening of potential caregivers by requiring a comprehensive assessment including pre-placement training requirement, full background clearance checks, home environment assessment, and in-depth family evaluation interviews to ensure that the applicants are in good physical and mental health and that they are ready to safely parent children.

Per the CWS Working Group recommendations, Child Welfare Services (CWS) is working with the CDSS and the National Council on Crime and Delinquency (NCCD) to determine approach if the Structured Decision Making (SDM) for Substitute Care Provider tools could be implemented to increase the quality of written family evaluations. The SDM for Substitute Care Provider tools provide a suite of assessments that assist agencies and workers in making better placement decisions. The tools include assessments that help improve placement stability, determine if there are any safety threats in the home, and aid in the assessment of the resource family's ability and willingness to meet the child's needs.

Finding 10: Safety Organized Practice (SOP) is a required statewide strategy designed to enhance social work skills in family engagement and critical thinking. For the County the percentage increased from 53% in Fiscal Year (FY) 2017 to over 65% in FY2018. The goal is 80% for FY2019.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Safety-Organized Practice (SOP) is the required statewide child welfare strategy for all counties participating in the California Well-Being Demonstration Plan (Title IV-E Waiver). SOP is a blending of evidence-based social work practices designed to enhance family engagement and critical thinking skills in order to create sustained safety for children involved with child welfare. The County of San Diego has focused on family strengthening efforts by utilizing SOP to safely keep children in their homes. Child Welfare Services (CWS) Continuous Quality Improvement (CQI) referral and case review tools measures social worker's overall use of SOP with families.

The goals for model fidelity were established by the County of San Diego and not mandated by the California Department of Social Services (CDSS). The most recent quarterly statistics (Jan-March 2019) show that staff are practicing at 70% model fidelity. CWS utilizes internal practice coaches to increase the utilization of SOP through monthly coaching sessions and identifying trends to increase participation. In addition, the CQI unit and Coaching teams meet bi-monthly to identify target areas to increase SOP model fidelity. CWS is also working with the National Center for Crime and Delinquency (NCCD) to develop an online database that will create easy access of the data collected from the reviews so targeted efforts by regions will be available.

Finding 11: For CWS to achieve its mission it is critical for the agency to attract, train, develop and retain a capable and prepared workforce.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Research has established a causal relationship between a capable child welfare workforce and positive case outcomes in areas of placement stability, maltreatment recurrence, reunification, and foster care and permanency outcomes. To attract a capable and prepared workforce, Child Welfare Services (CWS) will be working with university partners to develop new opportunities for attracting additional staff. CWS will also be exploring new recruitment and retention opportunities for staff.

Both classroom and field training are critical components in developing the skills of the child welfare workforce and to promote effective practice, increase worker confidence and achieve positive outcomes. Current training of new hires for Child Welfare Services (CWS) includes 10 weeks of Social Worker Initial Training (SWIT), followed by simulation and field exercises. In addition, social workers and supervisors are required to complete 20 hours of annual continuing education. CWS will be establishing training units for each region. Upon completion of SWIT, newly hired staff will be assigned to the training unit to receive additional support through mentoring and coaching as they take on referrals and cases.

Also, as referenced in the County of San Diego's response to the CWS Review Working Group Recommendations, CWS is working to reduce secondary traumatic stress (STS) for its workforce by developing an approach to build resiliency while also supporting staff experiencing STS, to improve retention of staff. CWS is participating in the Advancing California Trauma Informed Systems (ACTS) grant with Rady Children's Hospital Chadwick Center. This grant focuses on

implementing and sustaining trauma-informed change that aligns with best practice and research evidence. In order to retain staff, CWS will be studying rates of attrition to determine best practices, including a review of salary and benefits.

Finding 12: CWS loses a number of social workers per month to different county departments, other outside agencies or retirement.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Turnover of protective social worker classification within Child Welfare Services (CWS) is due to a variety of reasons such as changes in job classifications such as promotional opportunities in CWS, interdepartmental transfers, and separation from County of San Diego service.

Finding 13: High employee turnover negatively impacts clinical outcomes.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. Some research does suggest that high turnover negatively impacts outcomes for children and families involved with child welfare. However, “clinical” is an inapplicable term since Child Welfare Services (CWS) staff are not clinicians providing therapeutic interventions to families such as therapists.

Staff turnover is a barrier to managing staff caseloads. Having an adequate number of protective service worker positions and staff are essential to initiate and monitor the healing of children, youth and families and ensure positive outcomes. As previously stated, CWS will be studying rates of attrition to determine best practices, including a review of salary and benefits, as well as adding 125 new positions, which will help to support staff retention.

Finding 14: Communication between the Region and the Hotline workers could be more extensive.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Currently, the Child Abuse Hotline processes calls from the community and creates written reports which are investigated by child welfare staff. In order to provide ongoing communication with regional investigators, the Hotline team meets quarterly with staff and supervisors to discuss practice issues, trends and areas for improvement. In addition, the Hotline manager shares a monthly Hotline supervisor schedule with regional managers and is available to assist regional staff. The managers and supervisors communicate daily about referral assignments. When child welfare staff investigate referrals after business hours, the Hotline coordinates and supervises these investigations, ensuring communication and support.

Despite all these efforts, communication between the Hotline workers and regions could be more extensive. CWS has enhanced communication and collaboration between the Hotline workers and the regions by having Hotline staff assist with Protective Custody Warrants, dispatching social workers to the border for asylum cases and coordination with the Resource Family program so that children can be placed with resource families outside of regular business hours. CWS is also exploring the use of Hotline Multidisciplinary Teams that would bring together

Hotline staff and regional staff to make the determination about which Hotline reports need to be investigated or which ones can be referred to community partners.

Finding 15: On average, 15% of Hotline calls were from foster parents stating that the foster child was being abused by someone other than the foster parents.

Response: The County of San Diego Chief Administrative Officer disagrees with this finding. Foster parents calling the Hotline is not common; data does not support this finding. In calendar year 2018, there were 45,305 referrals made to the San Diego Child Abuse Hotline. Of those, only 23 were referrals from substitute care providers (foster parents) which is less than one percent (<1%). In 10 of the 23 referrals, the alleged perpetrator was not the caregiver and in the other 13, the alleged perpetrator was not identified. Statewide less than one percent (<1%) of calls are reported to be from daycare or foster care providers (these categories are combined as reported on the California Child Welfare Indicators Project) therefore the percentage for the County of San Diego is in alignment with the State.

Finding 16: The current Hotline system does not notate whether abuse happened before or after entry into foster care.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. There is capability to notate the date of abuse in the statewide Child Welfare Services Case Management System (CWS/CMS) database system, if used correctly. However, there have been identified issues statewide with data entry due to the design of this field. This design and data entry issue may have caused an over inflation of the numbers of maltreatment in foster care. In 2017, the State notified the counties to this issue in the All County Letter referenced in Finding 04. While this is being addressed at a State level, CWS is providing training to Hotline staff to ensure accurate documentation of the timeline for abuse/neglect incidences is completed.

Finding 17: Foster child telephone calls to the Child Abuse Hotline are not red flagged as being from a foster child therefore the percentage of calls from foster youth are not tracked.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. Currently, "Foster child" is not listed as an option for a reporting party in the statewide database used by Hotline workers. While youth in the foster care system may report allegations of abuse to the Hotline, they are more likely to notify their social worker, caregiver, therapist, teacher, Court Appointed Special Advocate (CASA), attorney or another trusted adult. Many of these groups of people are mandated reporters and are required by law to make a child abuse report. In these situations, the report is made on behalf of the child and the mandated reporter would be listed as the reporter, not the foster youth.

Finding 18: The Child Abuse Hotline transfers over to A.B. and Jessie Children's Polinsky Center from 10:30 pm to 6:00 am every day; however, Polinsky staff training is not as extensive as those stationed at the Hotline.

Response: The County of San Diego Chief Administrative Officer agrees with this finding. The Intake Unit at A.B. & Jessie Polinsky Children's Center (PCC) is responsible for taking Hotline calls overnight between 10:30 pm to 6:00 am. PCC staff receive training from the Hotline on how to operate the electronic phone board and how to complete the form used to collect the demographic and incident information being reported; however, they are not trained, nor expected, to make assessments or assignment decisions. Those tasks are completed by Hotline staff the following morning.

As referenced in the County of San Diego's response to the Child Welfare Services (CWS) Review Working Group Recommendations, CWS will enhance the current operation so that fully trained Hotline Protective Services Workers will answer calls 24 hours per day eliminating the need for PCC staff to answer calls.

Finding 19: Regional case carrying staff do not have a complete understanding of the Resource Family Agency (RFA) process and its requirements, resulting in a lack of communication with RFA workers when children are in placement.

Response: The County of San Diego Chief Administrative Officer partially disagrees with this finding. Resource Family Approval is a unified, family-friendly and child-centered approval process for all caregivers who are partnering with Child Welfare Services. This means that all caregivers, whether they are a relative or a foster family, go through the same streamlined approval process where all Resource Families will receive the same information, training, and opportunity for support in order to provide children and families with safety, permanency and well-being. The change in approval process under the Resource Family Approval (RFA) legislation created significant changes for both placement and case carrying staff. RFA has had numerous modifications due to the legislation and expectations, requiring enhanced communication and coordination.

In order to ensure regional staff are aware of the various expectations and processes, RFA supervisors regularly visit the regions and provide training regarding current procedures and the workflow. RFA workers are out stationed in the regions to assist the regional placement teams with any questions pertaining to the RFA process. RFA staff are assigned to attend Multidisciplinary Team (MDT) meetings as well as Child and Family Team (CFT) meetings within the regions to address any questions or concerns pertaining to the RFA process. To increase efficiency and maintain consistency, case assignments are done vertically, ensuring the same worker maintains the case during the various stages of the RFA process. The RFA team provides weekly updates to the case carrying worker, supervisor and the regional placement teams. The RFA team provides ongoing support to regional case workers, supervisors and managers through regular and ongoing trainings. Despite any challenges, CWS continues to improve the implementation of RFA in the region as it will ultimately support in providing children and families with safety, permanency and well-being

RECOMMENDATIONS

The 2018/2019 San Diego County Grand Jury recommends that the Chief Administrative Officer for the County of San Diego:

19-40: Request CWS, to study annual substantiated maltreatment numbers in San Diego County (cause and effect) and to determine best practices for minimizing maltreatment occurrences in the future.

Response: This recommendation has been implemented. As part of the ongoing Continuous Quality Improvement (CQI) efforts, Child Welfare Services (CWS) regularly monitors and analyzes data trends regarding rates of maltreatment. The federal Child and Family Services Review (CFSR) is a requirement that each county conduct case reviews to ensure conformity with federal child welfare requirements. One aspect of the tool includes an item regarding maltreatment of children. Data from CSFR reviews are analyzed and feedback is provided to CWS staff and leadership on a quarterly basis. In addition, data analysis is conducted on maltreatment as it pertains to the CWS System Improvement Plan (SIP). CWS is held accountable to these outcomes by the California Department of Social Services (CDSS), and we will continue to assess for best practices to minimize future maltreatment.

19-41: Request CWS to investigate the addition of a system to coordinate policies and procedures with regional staff and FFAs.

Response: This recommendation has been implemented. CWS currently has multiple avenues to share information and coordinate with Foster Family Agencies (FFAs). As referenced in the County of San Diego's response to the Child Welfare Services (CWS) Review Working Group Recommendations, CWS currently publishes all policies on software that is accessible to all CWS staff and will be making all of its policies publicly available so that it is easier to coordinate policies with partners and contractors, including FFAs.

In addition, the Institutions and Evaluation Unit (IEU) facilitates monthly contractor meetings and conducts semi-annual contract compliance reviews of each FFA. Each FFA contractor must comply with the County of San Diego Services Template, Exhibit A: Statement of Work and all other required contract exhibits. The IEU Contracting Officer Representative (COR) are in frequent verbal and written communication with contractors answering questions, providing clarification and information on new federal, State and local contract changes.

19-42: Request CWS to require any new or modified database system to delineate calls from foster youth.

Response: This recommendation will be implemented. This recommendation has not yet been implemented but will be implemented in the next 3 months. Child Welfare Services (CWS) participates in meetings with the California Department of Social Services (CDSS) to develop the new statewide database, Child Welfare Services California Automated Response and Engagement System (CWS-CARES). CWS will request this feature be developed in the new system. Meanwhile, although foster child is not a current field in the Child Welfare Services Case Management

System (CWS/CMS), CWS has determined that it can work around the limitations of the statewide system by assigning a Special Project Code in the current database to capture this data. If a foster youth identifies him/herself as a foster youth, the Hotline screener can add the identified code into the referral indicating the caller as a foster youth.

19-43: Request CWS to establish a training program on maltreatment of children (including human trafficking) that is required for *all* CWS staff, including congregated care employees and out-of-home families.

Response: This recommendation has been implemented. As of 2015, all new child welfare staff receive an overview of the commercial sexual exploitation of children (CSEC), including a review of policy, and in recent years there is a panel of survivors and community members who share experiences in addition to the formal overview classes. In addition, staff are required to attend 20 hours of annual trainings regarding critical thinking in investigations, which reviews maltreatment policies and procedures, as well training on trauma, sexual abuse, CSEC, mental health, and many other topics.

Since 2016, the Commercial Sexual Exploitation Identification Tool (CSE-IT), which is used to screen all youth 12 and older, has been utilized in Child Welfare Services (CWS). In Fiscal Year 16-17, 374 staff received this training and in Fiscal Year 17-18 an additional 71 staff attended the CSE-IT screening tool user training.

Resource parents are required to attend a pre-service training, which reviews the maltreatment of children, including human trafficking. In addition, a voluntary training on CSEC is offered at various times throughout the year. Over the last five fiscal years, 421 resource parents have been trained on CSEC. Foster Family Agencies (FFAs) also require trainings which include a review of child development and the impact of trauma, identifying and preventing child abuse (which includes a component about the trafficking and exploitation of children). For those homes which will be caring for children with higher level needs, there is a required training for working with children who are CSEC identified.

19-44: Request CWS to study turnover rates for staff and to develop best practices for recruitment, training and retention that would include salary and benefit comparisons across San Diego County.

Response: This recommendation will be implemented. This recommendation has not yet been implemented but will be implemented in the next 3 months. Currently, the County of San Diego is working to study and review staff turnover rates and develop recruitment strategies. Child Welfare Services (CWS) is also currently reviewing its hiring, training, and retention practices.

As previously mentioned, 125 CWS staff will be added with the goal of reducing caseloads and improving and enhancing training across all staffing levels to enhance positive outcomes to children, youth and families. Some strategies that will be implemented include:

- Establish training units in each region to provide consistent coaching, mentoring and training of new staff to improve the lives of children and the families they serve.
- Provide support of new staff with ongoing mentoring and coaching.
- Participation in the Advancing California Trauma Informed Systems (ACTS), a grant with Rady Children's Hospital Chadwick Center, which focuses on implementing and sustaining trauma-informed change with a specific focus on addressing secondary traumatic stress experienced by CWS staff.

In order to retain the newly hired staff for these positions, CWS will study rates of attrition to determine best practices, including a review of salary and benefits.

19-45: Request CWS to study current workloads for County social workers and to develop a system that allows for increased interaction between social workers and the foster child and family.

Response: This recommendation will be implemented. The recommendation has not been implemented and Child Welfare Services (CWS) will take steps to implement it over the next 6 months.

Every three years, the California Department of Social Services (CDSS) must develop a Performance Improvement Plan that is approved by the Administration for Children Families (ACF) to ensure child welfare throughout California is achieving positive outcomes for children and families. The current PIP is in effect until June 2021. As part of the PIP the CDSS is required to conduct a workload study of CWS duties. CWS is part of the statewide PIP implementation team and is working with CDSS to support the statewide workload study, which is expected to be completed within the next 2 years.

As previously mentioned, and as referenced in the County of San Diego's response to the CWS Review Working Group Recommendations, efforts are already under way to adapt the WorkWellSD task management process, which will standardize and automate business processes across CWS and the Health and Human Services Agency Regions. Doing so will optimize service delivery by using technology to map and standardize business processes, manage task assignments and enhance data collection to improve staff efficiency.

In addition, as part of the Community-Academic Partnerships for the Translational Use of Research Evidence (CAPTURE) research grant in partnership with the University of California, San Diego (UCSD), CWS is conducting a review of forms to reduce and streamline paperwork for staff, and develop overflow staffing positions to cover caseloads when workers are on leave. It is the goal that with decreased caseloads, streamlined forms and automation of process, social workers will have increased interactions with youth, caregivers and families of origin.

19-46: Request CWS to determine whether a team approach, including a minimum of two social workers per scheduled and unscheduled visits, would be viable when investigating alleged maltreatment.

Response: This recommendation requires further analysis. Having two social workers respond to over 22,000 investigations annually will significantly increase workload for staff. Currently, there are almost 200 social workers who conduct these investigations; thus, it is necessary to determine if this is possible to implement. The County of San Diego has specific policies to address worker safety for visits and investigations and workers may request the assistance of law enforcement if there is a safety concern. In addition, social workers oftentimes conduct investigations in conjunction with Resource Family Approval (RFA), Institutions and Evaluations Unity (IEU) or foster home licensing staff.

An assessment will be conducted over the next 6 months regarding the feasibility of having Child Welfare Services (CWS) social workers jointly investigating all investigations regarding maltreatment.

19-47: Recommend that an oversight board be established with the authority to access and investigate all reports of foster care maltreatment as well as foster care records.

Response: This recommendation requires further analysis. The County of San Diego will work with the State of California (in consultation with the Juvenile Court and County of San Diego Board of Supervisors approval) within the next 6 months to explore any existing or prospective legal options for a body that could serve such a function while in compliance with State and federal privacy laws.

19-48: Recommend that Hotline workers specifically document foster child calls and gather data accordingly.

Response: This recommendation will be implemented. The recommendation has not yet been implemented but will be implemented in the next 3 months.

As mentioned in Recommendation #19-42 Child Welfare Services (CWS) participates in meetings with the California Department of Social Services (CDSS) to develop the new statewide database, Child Welfare Services California Automated Response and Engagement System (CWS-CARES). CWS will request this feature be developed in the new system.

Meanwhile, although foster child is not a current field in the Child Welfare Services Case Management System (CWS/CMS), CWS has determined that it can work around the limitations of the statewide system by assigning a Special Project Code in the current database to capture this data. If a foster youth identifies him/herself as a foster youth, the Hotline screener can add the identified code into the referral indicating the caller as a foster youth.

19-49: Request CWS that all Polinsky workers answering Hotline calls between 10:30pm and 6:00am receive the same training as regular hour Hotline staff.

Response: This recommendation will be implemented. The recommendation has not yet been implemented but will be implemented in the next 6 months.

Child Welfare Services (CWS) is establishing a new process so that Hotline staff will be responsible for receiving and processing calls 24 hours per day, eliminating the need for calls to be answered by the Polinsky Children's Center staff.