



Guilford County
**Department of
Social Services**

CORRECTIVE ACTION PLAN

Final Approved 07-14-2023

Corrective Action Plan
Guilford County Department of Social Services

Date Plan Approved: July 14, 2023
 Date of CAP Review: September 14, 2023
 Next Projected review of CAP:

Finding: Challenges in Conducting Thorough Assessments

<p>Applicable Rule/Law/Policy:</p> <p>N.C.G.S. § 7B-300 states: “The director of the department of social services in each county of the State shall establish protective services for juveniles alleged to be abused, neglected, or dependent. Protective services shall include the screening of reports, the performance of an assessment using either a Family Assessment response or an Investigative Assessment response, casework, or other counseling services to parents, guardians, or other caretakers as provided by the director to help the parents, guardians, or other caretakers and the court to prevent abuse or neglect, to improve the quality of child care, to be more adequate parents, guardians, or caretakers, and to preserve and stabilize family life.”</p> <p>N.C.G.S. § 7B-302 states: “When a report of abuse, neglect, or dependency is received, the director of the department of social services shall make a prompt and thorough assessment, using either a Family Assessment response or an Investigative Assessment response, in order to ascertain the facts of the case, the extent of the abuse or neglect, and the risk of harm to the juvenile, in order to determine whether protective services should be provided or the complaint filed as a petition.”</p> <p>See also 10A NCAC 70A et. seq.</p> <p>CPS Assessments Policy, Protocol, and Guidance pg. 4</p>	<p>Reasons for the Finding:</p> <ul style="list-style-type: none"> During the review period, the average Assessment vacancy rate was 30% Social Worker to case ratio exceeding state standard of 1:10 Social Work Supervisors carrying cases due to high vacancy rate Abbreviated and/or inconclusive dictation New staff and supervisors/learning curve and delay in new staff registering and receiving required trainings Lack of capacity to provide timely Technical Assistance from NCDSS to supplement existing trainings Limited child welfare practice model integration in NCFast
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Goal for Improvement: Guilford County will complete thorough assessments of safety and risk for children and families in all program areas in accordance with law, rule, and policy.

Strategies/Activities	Resources Needed	Who is Managing	Projected Goal Review Date	Desired Outcome (measurement)
1) All Child Welfare Social Workers and Social Work Supervisors will participate in Back to Basics Trainings that focus on safety, risk and the appropriate use of SDM Tools. Each unit will view the training together as a group and will have leadership led discussion on lessons learned following the completion of each webinar.	NCSWlearn	Division Director / Supervisors / PMs	10/2023	SDM Tools will be completed accurately and as required in all program areas and will be utilized in the assessment of safety, risk and decision making.
2) Program Managers (“PM”) will participate in all case decision team staffing, for the next six (6) months, to ensure that case documentation is	Case Review Tools	Division Director / PM / Supervisors	10/2023	That agency practice in the provision of CPS is in adherence with NC CW policy and law. Specifically, that case decisions

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thorough, detailed, addresses safety and risk and that all required tasks have been completed.				in CPS are appropriate and supported by documentation.
3) PMs will conduct a 3 rd Level Review of all Safe with a Plan Safety Assessments and will review at least 10% of Safe Safety Assessments with representation from each CPS team monthly to ensure that safety assessments are adequate to ensure safety, document behaviors of concern related to safety factors identified and that the safety plans are detailed and behavior specific to address immediate safety concerns.		Division Director / PM / Supervisors	10/2023	Safety Assessments will be adequate to ensure immediate safety concerns are addressed and will reflect observations and information obtained during the assessment.
4) NCDSS will provide Intensive Technical Assistance to Management in the form of coaching and training on Conducting Thorough Assessments, assist in the development and implementation of protocols and periodic case reviews to monitor progress.		GCDSS / NCDSS	10/2023	GCDSS will complete thorough assessment in accordance with policy and law, including SDM tools completed accurately, and utilized to support case decisions, assist in the ongoing review of safety and risk and during supervisory oversight.
5) NCDSS will review a sample Safe with a Plan Safety Assessments monthly from each Program Manager's unit to ensure that safety assessments are adequate to ensure safety and to provide direct coaching and feedback to PMs and SWS on the review of safety assessments.		GCDSS / NCDSS	10/2023	Program Managers and SWS will effectively facilitate pre-initiation conferences and post initiation conferences with workers to ensure that safety assessments are adequate to ensure safety and are behavior specific.

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Finding: Lack of Ongoing Supervisory Oversight in Accordance with Child Welfare Policy

Applicable Rule/Law/Policy:

The social work supervisor and assigned child welfare case worker must staff each assessment case: • Frequently enough to ensure the safety of all victim children, but at a minimum of once every other week; and • Whenever there is a change in circumstances that impacts safety and/or risk to a child(ren).

The social work supervisor and assigned child welfare case worker should staff each in-home case: • At least two (2) times a month for all cases in the first three (3) months, monthly thereafter • High-risk cases at least two (2) times a month • Whenever there is a change that impacts safety and risk.

The social work supervisor and assigned child welfare case worker must staff each permanency planning case: • At least once a month throughout the life of the case; and • Whenever there is a change in circumstance that impacts safety and/or permanency of the child.

See also 10A NCAC 70A et. seq. and 10A NCAC 70G et. seq.

Role of the Supervisor: Assessment, In-Home and PP Manuals

Reasons for the Finding:

- During the review period, the average Assessment vacancy rate was 30%.
- Social Worker to case ratio exceeding state standard of 1:10
- Social Work Supervisors carrying cases due to high vacancy rate
- New staff and supervisors/learning curve and delay in new staff registering and receiving required training
- Lack of capacity to provide timely Technical Assistance from NCDSS to supplement existing trainings
- Abbreviated and/or inconclusive dictation
- Limited child welfare practice model integration in NCFast

Goal for Improvement: Supervisory oversight will be conducted as required per policy for all program areas to ensure accountability regarding CW policy and practice during the provision of services.

Strategies/Activities	Resources Needed	Who is Managing	Projected Goal Review Date	Desired Outcome (measurement)
1) Escalation Protocol will be developed and implemented for Supervisors and Managers in all program areas.	RCWC provided sample escalation list	Division Director / PMs	9/2023	Division Director and PM will be aware of all critical incidents in all program areas.
2) Program Managers will conduct weekly random checks of open cases to ensure that SWs are receiving ongoing supervisory oversight a minimum of every other week and high-risk cases weekly in CPS Assessments and as required by policy in In Home and PP services and that documentation of supervisory oversight reflects timely supervision and covers all content required by policy. Each PM will create a tracking log to document weekly random checks that can be reviewed by NCDSS staff upon request	NCDSS to provide tracking spreadsheet example	Division Director / PM / Supervisors	10/2023	Supervisory oversight will occur as required by policy in all program areas to ensure safety, risk and wellbeing have been addressed.
3) All Social Workers and Supervisors and Leaders (PM/Division Director) will complete mandatory Practice Standards training offered by	NCSWlearn	Division Director / PM / Supervisors	10/2023	Management will confirm the completion of training by all levels of staff. CGDSS Leadership will discuss ongoing

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NCDSS. GCDSS Leadership will utilize the associated self-assessment tools.				implementation of the Practice Standards as part of their ongoing oversight of supervision and service delivery.
4) Departmental leadership will maintain, update, and utilize the county training log to monitor trainings and ensure that all Social Work Supervisors and Social Workers attend all 1st year trainings and have 24 hours of continued education trainings each year thereafter for continued professional development. All Child Welfare employees will have the referenced goal listed in their annual performance evaluation.	County training log and annual performance evaluations	Division Director / PM / Supervisors	10/2023	GCDSS staff will be trained in their specific program area to ensure the provision of services is in adherence to policy and ensures safety.
5) Social Work Supervisors will utilize a best practice checklist/guide during case staffing to discuss ongoing face to face contacts with children and parents in all program areas to ensure that children are being seen and interviewed separately, parents are being seen to assess safety and risk and documentation is current within seven (7) days and reflects case activities.		Division Director / PM / Supervisors	10/2023	Ongoing contacts with children and parents will occur timely and as required by policy and documentation will be reflective of all completed case activities and will be in adherence with policy and will implement work plans when appropriate.
6) During supervisory oversight of open cases in all program areas, SWs will check that case documentation is current within seven (7) days and reflects case activities.		Division Director / PM / Supervisors	10/2023	Case documentation will be current within seven (7) days and will be reflective of all case activities and will document a thorough ongoing assessment of safety and risk.
7) NCDSS will provide Intensive Technical Assistance to Management in the development and implementation of protocols that address supervisory oversight adherence of Child Welfare policy and integration of NCDSS's case review tools into the NCDSS's quality assurance process. This will include shadowing and coaching of supervisory oversight sessions and the facilitation of Supervisory Oversight in CW training to supervisors and PMs.		GCDSS / NCDSS	10/2023	Management will provide ongoing, effective supervisory oversight to SWs to ensure CW policy adherence and thoroughly assess safety, risk, wellbeing in all program areas, and alignment in auditing practices and standards.
8) NCDSS will provide Intensive Technical Assistance in the form of coaching and training to assist in the development and implementation of case staffing and supervision tools (beyond the NCFast prompts) and protocols and internal continuous quality improvement processes and reporting.		GCDSS / NCDSS	10/2023	Supervisory Oversight will ensure that SDM tools are completed correctly and are utilized in decision making and the ongoing assessment of safety and risk in all program areas.

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Finding: GCDSS has a Placement Stability of 11.6 The national standard is 4.1 The review revealed that Family Services Agreements were not completed timely and were not reflective of Strengths and Needs; Ongoing contacts with parents did not occur according to policy; and children experienced unnecessary moves that did not lead to permanence

Applicable Rule/Law/Policy:

Permanency Planning Services must be provided to any child in the custody or placement responsibility of a county child welfare services agency. Reunification with the parents, guardians, or custodian from whom the child is removed must be the primary or secondary plan unless the juvenile court makes findings under N.C.G.S. 7B-901(c) or N.C.G.S. 7B-906.1(d)(3), that the permanent plan is or has been achieved, or the court makes written findings that reunification efforts clearly would be unsuccessful or would be inconsistent with the juvenile's health or safety.

When removal is necessary to preserve a child's safety and well-being, the county child welfare services agency must:

- Provide services to preserve or reunify families until the juvenile court has determined reunification would not meet the child's need for safety and permanency within a reasonable length of time;
- Ensure the child is in county child welfare custody for the shortest time possible;
- Provide family-centered services that are time limited and goal oriented; Complete a thorough assessment of the child and family's needs; and
- Provide careful planning prior to and throughout a child's placement. Ensuring a child's safety and working to achieve permanency must always be parallel functions.

Public Law 96-272, Adoption Assistance and Child Welfare Act of 1980 is one of the most significant federal laws shaping the provision of services to children needing foster care. The requirements of this law were developed to ensure that children do not linger unnecessarily in foster care placements. It also frames many requirements for receipt of federal Title IV-E funding.

Public Law 105-89, The Adoption and Safe Families Act of 1997, expands and clarifies the intent of P.L. 96-272. This legislation establishes unequivocally that our national goals for children in the child welfare system are safety, permanency, and well-being.

Reasons for the Finding:

- Abbreviated and/or inconclusive dictation
- New staff and supervisors/learning curve and delay in new staff registering and receiving training
- Lack of capacity to provide timely Technical Assistance from NCDSS to supplement existing trainings
- Limited child welfare practice model integration in NCFast
- Additional duties, specifically line of sight supervision of foster youth due to limited therapeutic placement services
- GCDSS often does not demonstrate transparency in communicating with foster parents.
- GCDSS often does not include foster parents in planning for permanency of a child in their home.

Goal for Improvement: Out of Home Family Services Agreements(OHFSA)will be developed with families timely in accordance with policy. OHFSA will be reflective of the SDM tools, will address safety and risk and will be discussed with the parent at every contact.

Strategies/Activities	Resources Needed	Who is Managing	Projected Goal Review Date	Desired Outcome (measurement)
1) The Program Managers will create and implement an OHFSA timeliness tool/report to		Division Director / PMs / Supervisors	10/2023	OHFSA will be developed with the family within 30 days of custody or documentation will reflect ongoing,

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monitor and ensure completion within 30 days of custody.				thorough diligent efforts to locate and engage.
2) Social Work Supervisors will use a best practice checklist/tool staff a Permanency Planning case with the assigned social worker, including a review of the initial Strengths and Needs and Risk assessments prior to the development of the OHFSA to ensure the OHFSA addresses safety and risk and is reflective of the SDM tools.		Division Director / PMs / Supervisors	10/2023	OHFSA objectives will be behavior specific, address safety and risk and be reflective of the strengths and needs identified in the SDM tool.
3) NCDSS will provide Intensive Technical Assistance to Management in the development and implementation of protocols and monitoring tools that address timely permanence and in the facilitation of training focused on developing Effective Out of Home Family Services Agreements.		GCDSS / NCDSS	10/2023	GCDSS will provide permanency planning services to families as required by policy to ensure timely permanence.
4) NCDSS will provide Intensive Technical Assistance in the form of coaching and training to assist in the development of a Court Partnership Plan to include a focus on timely permanence, court scheduling, judicial oversight for moderate to high-risk families with in-home family service agreements and foster parent engagement.	Continued planning with local court partners	GCDSS / NCDSS	10/2023	Increased oversight, collaboration and support in risk and safety mitigation for complex cases and circumstances to strengthen and preserve families in effort to mitigate then entrance into foster care.
5) GCDSS utilize the training developed by NCDSS on "Crucial Conversations" to train their staff that interact with foster parents.		NCDSS/ GCDSS Management and Training Staff	10/2023	GCDSS management and training staff will be able to train supervisors and frontline staff and ensure appropriate transfer of learning. This will lead to better transparency in working with foster parents
6) GCDSS will establish a routine for randomly selecting a group of foster parents to interview to determine if communication is clear and needs are being met and utilize the information obtained in the interviews to continually assess practice and to continue to make needed improvements.		GCDSS QA Team and management team	10/2023	There will be data from interviews with foster parents to be used to develop ongoing strategies for building strong working relationships with foster parents.
7) GCDSS will partner with the Foster Family Alliance to reinforce roles, responsibilities, and appropriate boundaries of foster parents.		GCDSS/ Foster Family Alliance	10/2023	GCDSS will see higher satisfaction rates from their interviews with foster parents.
8) GCDSS and NCDSS will conduct a blitz of current open foster care case to ensure goals and strategies are appropriate to meet the identified permanency plan. Needed changes will be made as identified.		GCDSS QA team. NCDSS	10/2023	GCDSS will develop case plans that are aligned with the identified needs that brought the child into custody and strategies and activities better aligned to achieve that goal.
9) NCDSS will review a sample of all new Out of Home Family Services Agreements to ensure		NCDSS	10/2023	GCDSS will develop case plans that are aligned with the identified needs that

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goals and strategies are appropriate to meet the identified needs.				brought the child into custody and strategies and activities better aligned to achieve that goal.
10) All unplanned moves will be staffed prior to the move with the Human Services Director and the Social Services Director.		GCDSS Management Team,	10/2023	GCDSS will see a reduction in their placement stability outcome.

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