

C.2 - DFCS Response to 2/2023 CDSS Recommendations

Background

In September 2022, the California Department of Social Services (CDSS), as the oversight body for child welfare in the State of California, conducted an “onsite review” with the Department of Family & Children’s Services. Five months later, CDSS sent DFCS an unsigned Word document labeled “Santa Clara Findings Report Final.” The Findings Report includes summaries of concerns reported to CDSS, information observed or gathered by CDSS, and, on page 10, recommendations for DFCS. CDSS’s recommendations focused on policy development, training, communication, and monthly reviews. CDSS did not recommend a change in protocols or take any action against DFCS, such as placing DFCS on an improvement plan.

The Board requested a status of all recommendations made by CDSS in 2023. The below matrix provides the CDSS’s recommendations to DFCS as well as DFCS’s response to those recommendations, including both actions taken subsequent to CDSS’s recommendation as well as information on relevant DFCS policies and practices that were in place prior to CDSS’s recommendation.

Recommendations and Actions Matrix

	CDSS Recommendation	Actions Taken by DFCS
1a	DFCS should create a policy and procedure on how to document in CWS/CMS when a determination regarding referrals is different than what SDM and other assessments conducted evaluates as the proper determination.	<ul style="list-style-type: none"> • Prior to February 2023 CDSS findings, DFCS required documentation of assessments and decisions, as outlined in the Operational Policy and Procedures (OPP) chapter on Contact Documentation Standards (last updated Dec. 2020) and OPP chapter on SDM Safety Assessments (updated July 2021). • The OPP chapter on Conducting an Emergency Response Assessment was revised as outlined below in response to this recommendation: <ul style="list-style-type: none"> ○ In June 2023, this OPP chapter was revised to update the documentation requirements in CWS/CMS for all points of contact with the family during the emergency response phase. ○ In July 2023, this OPP chapter was revised to update the assessment guides related to physical, mental health/emotional, parent incapacity, sexual maltreatment, and substance use disorders. ○ In September 2023, this OPP chapter was revised to update investigation steps and documentation requirements related to elements of the Child and Family Practice Model, Safety Organized Practice and Structured Decision Making. ○ In October 2023, this OPP chapter was revised to update investigation requirements including reinforcing the requirement to document assessments and engagement. There were also additional revisions related to case consultations, investigating allegations of physical injury, Indian Child Welfare Act (ICWA), and protective custody warrants. • To reinforce and remind the department about these requirements, DFCS Leadership distributed the following communications to the department: <ul style="list-style-type: none"> ○ DFCS Leadership sent a memorandum to all staff on June 1, 2023 to remind the department their documentation and SDM assessments requirements per the OPP. ○ DFCS Director sent the Interim Direction memorandum to staff on November 15, 2023 that included a reminder that Social Worker Supervisors must document in CWS/CMS the DFCS decision(s).

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1b	<p>The CDSS recommends that policy guidance be disseminated to front line staff and supervisors on how to capture legal consultations and consequent determinations through documentation in CWS/CMS in a way that does not violate privilege, as it is important to have accessible records on every decision-making step of a child welfare case.</p>	<ul style="list-style-type: none"> • Prior to February 2023 CDSS findings, DFCS required staff to document as outlined in the OPP chapter on Contact Documentation Standards (updated December 2020). This OPP chapter provides for DFCS staff to note privileged communications from County Counsel on a particular form to be stored with the physical case file. • In response to CDSS’s recommendation that the documentation should not be in the physical case file but in CWS/CMS, DFCS is developing a new policy to require consistent documentation by DFCS of legal consultations in CWS/CMS, and once finalized, will retire the prior policy. This will allow legal consultations to be documented in the electronic file versus relying on a physical file.
2	<p>DFCS leadership should disseminate system wide messaging providing insight into the reasons and goals of system wide practice changes and refinements, specifically around Santa Clara County’s Child and Family Centered Practice.</p>	<ul style="list-style-type: none"> • Prior to CDSS’s recommendation, DFCS Leadership disseminated the following messages to staff on the reasoning and goals of system wide practice changes and refinements: <ul style="list-style-type: none"> ▪ Email message was sent from DFCS Director to DFCS staff in June 2020 regarding the need to explore practice disproportionality. ▪ Email message sent from DFCS Director to DFCS staff in September 2020 outlining several upcoming initiatives including work with Kevin Campbell and Family Healing. The email further states an opportunity for our County to be a leader in rethinking the work of child welfare. The initiative planning with Kevin Campbell began in early 2021 with the initial training sessions starting in 2022. ▪ Email message sent from DFCS Director to DFCS staff in November 2020 outlining DFCS priority areas, which included disproportionality and a vision around reimagining child welfare in alignment with the State’s Child and Family Practice Model. ▪ Email message was sent from DFCS Director to DFCS staff in January 2021 regarding consistency in application of legal requirements and elevating matters to DFCS executives when a Social Worker is advised that there was insufficient evidence to petition for removal. ▪ Email message was sent from DFCS Director to DFCS staff in July 2021 providing updates on agency goals. This included updates around disproportionality, race equity, and prevention services.at ▪ Email message was sent by DFCS Director to DFCS staff in September 2022 highlighting how DFCS’s work was referenced as a promising practice in a national article discussing removals. • In response to CDSS’s recommendations, DFCS took the following steps: <ul style="list-style-type: none"> ▪ DFCS Director sent a memorandum to DFCS staff in April 2023 regarding Child Safety and Well Being. ▪ DFCS reinforced its prior communications about the reasons and goals of system wide practice changes and refinements with the following communications:

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		<ul style="list-style-type: none"> ▪ DFCS Leadership issued Memorandum #23-Dz03- SDM and SOP Practice Clarification & Assessments of Safety & Risk and Supporting Child & Family Wellbeing in June 2023. ▪ DFCS Director communicated strategic framework to staff via memoranda sent on October 30, 2023 and December 1, 2023. <ul style="list-style-type: none"> • DFCS Leadership also will speak to the reasons and goals for the practice changes and refinements at the Integrated Core Practice Model (ICPM) Trainings scheduled in 2024.
3	<p>DFCS should immediately create a training schedule where all social workers and social worker supervisors who work with SDM tools will complete training within 30 days of being hired, and for all staff who are already in current positions within six months.</p>	<ul style="list-style-type: none"> • SDM training is now included in Child Welfare Social Worker Core Training for all newly hired Social Workers. • DFCS contracted with the creators of SDM, Evident Change, to provide ongoing training and coaching around the SDM model. These trainings are ongoing, and available to all staff through a training calendar where staff can sign up. The training schedule is coordinated by DFCS and the Social Services Agency’s Staff Development team. • DFCS is now offering a training with Bay Area Academy to provide safety plan training as requested by staff. • Training and coaching to support the on-going use of SDM tools in practice have been and continue to be provided for Social Workers and Social Worker Supervisors. <ul style="list-style-type: none"> ▪ The attached November 2023 SDM/SOP training report that reflects prior SDM trainings. ▪ Upcoming trainings scheduled between February 8th and 20th of this year on recent CDSS updates to SDM tools. ▪ Staff were also encouraged to participate in training and coaching calls with Evident Change regarding modifications to one of the SDM safety tools (<i>see</i> ACL 23-101: Structured Decision-Making Enhancements to the Hotline, Safety, and Risk Assessment Tools and California SSDM V3.5 Assessment Updates). ▪ DFCS is working with Staff Development to develop targeted training opportunities if some staff have missed a prior SDM training.
4	<p>DFCS should create policies and procedures on how social workers should respond if a family fails to meet components of the safety plan, including but not limited to: failing to agree to and signing the safety plan, failing to complete suggested or required drug testing, failing to keep the children from parties deemed as unsafe, etc. These policies and procedures should include guidance that failure to follow the safety plan could result in further child welfare and/or court involvement.</p>	<ul style="list-style-type: none"> • Prior to the CDSS’s recommendation, DFCS had implemented the following relevant policies: <ul style="list-style-type: none"> ○ OPP Chapter - Safety Planning: provides how staff are to respond when a safety threat increases and/or the caregiver’s protective capacity diminishes by specifically noting that an increased level of intervention by the department may be required. ○ OPP Chapter - Non-Court Family Maintenance: if there are additional allegations of abuse and/or neglect occur in an open case, the Social Worker must reassess the child’s safety to determine the appropriate level of intervention. ○ OPP Chapter – Informal Supervision Services: if a family fails to meet any components of their safety plan, the social work staff should assess situation and consult manager to determine if a higher level of intervention is necessary. • Division managers are reviewing existing guidance with Social Worker Supervisors who will then be responsible for working with Social Workers.

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		<ul style="list-style-type: none"> • DFCS is currently making additional policy updates within OPP to following chapter(s): <ul style="list-style-type: none"> ▪ Conducting an Emergency Response Assessment, and ▪ Non-Court Family Maintenance to clarify more clearly that lack of compliance with a safety plan or additional safety concerns require reassessment and consideration of increased level of intervention.
5	<p>Social Work[er] Supervisors should implement a system of monthly reviews of open referrals and utilize supervision time with the social workers to review the status of any referrals open longer than 30 days.</p>	<ul style="list-style-type: none"> • Prior to the CDSS’s recommendation, DFCS had implemented OPP Chapter 2-3 Conducting an Emergency Response Assessment, which provides that referrals should not be kept “open” for more than 30 days from the initial contact with the victim child and outlines the requirement for social work staff, if a referral is kept open longer than 30 days. • In response to this recommendation, DFCS’s practice is for Social Worker Supervisors to review referrals that are open for more than 30 days and ensuring policies for continued contact/monitoring and holding a Child & Family Team meeting is scheduled. • In addition to the Social Worker Supervisors review, DFCS Leadership is now also reviewing the monthly list of any referrals over 30 days to support conversations with staff around timely closure of referrals or further intervention, if warranted. • Division Managers are also reviewing existing guidance with Social Worker Supervisors who will then be responsible for instructing Social Workers.
6a	<p>DFCS should immediately create a training schedule to train all Social Workers and Social Worker Supervisors on the standard for child removal, the legal basis for removal, the process of Protective Custody Warrants.</p>	<ul style="list-style-type: none"> • County Counsel provides regular training for Emergency Response Social Workers on these legal standards, including the following: <ul style="list-style-type: none"> ○ ER Nuts and Bolts <ul style="list-style-type: none"> ▪ January 2019 – 17, 19, 24 25, 30 ▪ August 9, 2021 ▪ July 26, 2022 ▪ August 18, 2023 ○ Dependency Court Overview <ul style="list-style-type: none"> ▪ August 2021 – 18, 24 ▪ August 17, 2022 ▪ August 30, 2023 ○ DI Nuts and Bolts <ul style="list-style-type: none"> ▪ August 25, 2021 ▪ August 24, 2022 ▪ September 6, 2023 • DFCS Leadership is creating an updated training to be delivered in the first quarter of calendar year 2024 to support the process of removals and the warrant processes including protective custody warrants, interview warrants, etc.

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6b	DFCS should immediately create a training schedule to train all Social Workers and Social Worker Supervisors on the process of promoting referrals to Voluntary Family Maintenance cases	<p>DFCS has addressed this issue through the following policies:</p> <ul style="list-style-type: none"> • OPP Chapter – Non-Court Family Maintenance outlines: <ul style="list-style-type: none"> ○ Assessment consideration for Non-Court Family Maintenance (FM) Cases and process for promoting a referral to a non-court FM case. ○ Division Managers are also reviewing existing guidance with Social Worker Supervisors who will then be responsible for instructing Social Workers.
6c	DFCS should immediately create a training schedule to train all Social Workers and Social Worker Supervisors on the county process for handling disagreements and how to proceed with a referral.	<ul style="list-style-type: none"> • DFCS Leadership sent communications to Social Workers, Supervisors, and Division Managers reinforcing that if there are disagreements regarding how to proceed with a referral, the next level of management should be consulted up to the Director level, if necessary. These communications were most reinforced by the Interim Direction sent on November 15, 2023, and are also reflected in OPP Chapter – Case Consultations. • Division Managers are going to continue to review existing guidance with Social Worker Supervisors who will then be responsible for instructing Social Workers.

Attachments:

- Attachment A: November 2023 SDM/SOP Training Report
- Attachment B: All County Letter (ACL 23-101): Structured Decision-Making Enhancements to the Hotline, Safety, and Risk Assessment Tools
- Attachment C: California SSDM V3.5 Assessment Updates

Attachment A –
November 2023 SDM/SOP
Training Report

Training/Coaching Data
 SOP Foundations: Mapping Harm Danger and Safety Goals
 11/9/2023

SOP Foundations: Mapping, Danger Statements & Safety Goals Training	Date	Participants
Target Audience Front end Sup/Manager Training	11/3/2022	8
Target Audience Front End Sup/Manger Training	11/4/2022	15
Target Audience Front End Sup/Manager Training	11/10/22	24

Front End SOP Foundations : Mapping, Danger Statements & Safety Goals Training	Date	Participants
Training – Front End SW	2/14/2023	22
Training-Front End SW	2/16/2023	21
Training- Front End SW	2/28/2023	21
Training- Front End SW	3/2/2023	21
Training- Front End SW	3/7/2023	15
Training- Front End SW	3/9/2023	22
Training- Front End SW	3/20/2023	14

SOP Foundations Mapping, Danger Statements & Safety Goals	Date	Participants
SWB Sup/Manager Training	6/9/2023	11
SWB Sup/Manager Training	6/14/2023	11

SOP Foundations Mapping, Danger Statements & Safety Goals (SWB)	Date	Participants
Training - SWB	8/17/2023	12
Training-SWB	8/21/2023	23
Training-SWB	9/8/2023	16
Training-SWB	9/11/2023	11
Training- make up session	11/3/2023	15
Training- make up session	11/9/2023	TBD

Training/Coaching Data
 SOP Foundations: Mapping Harm Danger and Safety Goals
 11/9/2023

SOP Foundations CANC	Date	Participants
Training	10/16/2023	14
Training	10/30/2023	7
Training	11/1/2023	8

SOP Foundations (Social Work Academy)

Training	Date	Participants
Training	4/26/23	14
Training	10/13 & 10/16/23	25

SOP Foundations Coaching

Supervisor Group SOP Coaching	Date	Participants
Supervisor Group SOP Coaching	11/29/2022	6
	1/12/2023	3
	1/18/2023	6

SOP Unit Based Coaching	Dates	Participants
Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 1 Front End and SWB	3/23/2023 3/29/2023 4/4/2023 7/17/2023 7/19/2023 7/20/2023	Total for Front end & SWB coaching sessions 1 60
Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 2 Front End and SWB *please note there is a drop off of SWB participation - 3 persons of the 87 participated in session 2 coaching. In addition there was a training day that had to be switched	4/13/2023 5/3/2023 5/11/2023 10/5/2023 10/11/2023 10/16/2023 10/17/2023	Total for Front end & SWB coaching sessions 2 87
Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 3 Front End In progress for SWB	5/31/2023 6/1/2023 6/7/2023	Total for Front end coaching sessions 3 68

Training/Coaching Data
 SOP Foundations: Mapping Harm Danger and Safety Goals
 11/9/2023

Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 4 Front End Note check memo In progress for SWB	7/18/2023 7/19/2023 8/18/2023 8/22/2023	Total for Front end coaching sessions 4 11
Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 5 Front End In progress for SWB	9/11/2023 9/13/2023 9/20/2023 9/26/2023	Total for Front End coaching session 5 53
Coaching SOP Foundations Mapping, Harm & Danger Statements and Safety Goals Session 6 Front End In progress for SWB	10/3/2023 10/4/2023 10/18/2023	Total for Front End coaching session 6 42

Safety Planning

Rigorous and Family- Centered Safety Planning for Child Protection (safety planning)	Date	Participants
Training	5/18/22	55
Training	5/18/22	34
Training	6/17/22	42
Training	6/23/22	50
Training	6/24/22	49
Training	9/28/22	27
Training	10/11/22	28

Structured Decision Making

(Refresher) Rigorous and Family-Centered Safety and Risk Assessment	Date	Participants
Training	5/11/23	25
Training	5/12/23	16
Training	5/15/23	18
Training	5/18/23	9
Training	5/19/23	19
Training	5/23/23	40

Attachment B –
All County Letter:
Structured Decision-Making
Enhancements to the
Hotline, Safety, and Risk
Assessment Tools

December 21, 2023

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES

EXECUTIVE SUMMARY

ALL COUNTY LETTER NO. 23-101

This letter is to inform county child welfare services agencies and Tribes of updates to the Structured Decision Making Hotline, Safety and Risk Assessment tools. These updates conform with existing laws, policies, regulations, and guidance to promote increased child safety throughout California as well as increase alignment with the Indian Child Welfare Act ([25 United States Code section 1901 et seq.](#)) and statutory changes made to the Welfare and Institutions Code sections by [Assembly Bill 3176](#) (Chapter 833, Statutes of 2018) which includes active efforts requirements for collaborative assessment for the Indian child's Tribe early, often and as practicably possible, which continues throughout the life of a case.



KIM JOHNSON
DIRECTOR

CALIFORNIA HEALTH & HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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GAVIN NEWSOM
GOVERNOR

December 21, 2023

ALL COUNTY LETTER NO. 23-101

TO: ALL COUNTY CHILD WELFARE DIRECTORS
ALL CHILD WELFARE SERVICES PROGRAM MANAGERS
ALL INDEPENDENT LIVING PROGRAM COORDINATORS
ALL TITLE IV-E AGREEMENT TRIBES

SUBJECT: STRUCTURED DECISION MAKING: ENHANCEMENTS TO THE
HOTLINE, SAFETY, AND RISK ASSESSMENT TOOLS

REFERENCE: [ASSEMBLY BILL \(AB\) 3176 \(CHAPTER 833, STATUTES OF 2018\)](#), [AB 2085 \(CHAPTER 770, STATUTES OF 2022\)](#);
[WELFARE AND INSTITUTIONS CODE SECTION 16504\(c\)](#);
[PENAL CODE \(PC\) SECTION 11165.13](#); [PC SECTION 11165.2](#);
[CHILD WELFARE SERVICES MANUAL OF POLICIES AND PROCEDURES DIVISION 31 REGULATIONS](#);
[UNITED STATE CODE SECTION 1901 ET SEQ.](#);
[COMPREHENSIVE ADDICTION AND RECOVERY ACT OF 2016](#);
[ALL COUNTY LETTER \(ACL\) NO. 17-92](#),
[ACL NO. 18-140](#), [ACL NO. 20-122](#), [ACL NO. 23-46](#),
[ACL NO. 23-64](#)

The purpose of this All County Letter (ACL) is to inform county child welfare services (CWS) agencies and Tribes of updates to the Structured Decision Making (SDM®) Hotline and Safety and Risk Assessment tools. These updates conform with existing laws, policies, regulations, and guidance to promote increased child safety throughout California as well as increase alignment with the Indian Child Welfare Act (ICWA) ([25 United States Code section 1901 et seq.](#)) and statutory changes made by [Assembly Bill \(AB\) 3176 \(Chapter 833, Statutes of 2018\)](#) which includes active efforts requirements for collaborative assessment for the Indian child's Tribe early, often, and as practicably possible, which continues throughout the life of a case.

BACKGROUND

Evident Change has partnered with the California Department of Social Services (CDSS) since 1998 to assist CWS workers to help assess the risk and safety of vulnerable children. The SDM® suite of assessment tools assist CWS agencies and Tribes, as applicable, to ensure the ongoing safety and well-being of children and provides a framework for consistent decision making across the child welfare continuum. The implementation of a *Standardized Safety Assessment System* was addressed in the CDSS' first Child and Family Services Review in 2003 and continues to be a requirement. As of July 2016, all 58 counties in California utilize SDM® for screening and assessment. The SDM® suite of tools include the following:

- Hotline Tool: Screens referrals for in-person response and recommends how quickly a response must be made.
- Safety Assessment: Determines if it is safe for a child to remain home or what actions need to be taken to ensure safety.
- Risk Assessment: Supports decisions about post-investigation intervention based upon the characteristics of the household, associated with the likelihood of future protection system involvement.
- Reunification Reassessment: Determines if children can safely return home after time spent in relative care or foster care.
- In-Home Family Risk Reassessment: Determines if risk has been reduced sufficiently for a family maintenance case to be closed or if services should continue.

The SDM® assessment tools are continuously updated and improved through continuous user feedback, changes in statutes, the CWS Manual of Policies and Procedures Division 31 regulations, and periodic research and evaluation. Through several statewide workgroups throughout 2020 and 2021 and the SDM® Core Team meetings in 2022 and 2023, Evident Change and the CDSS collaborated with key stakeholders, including tribal representatives from over 30 Tribes and tribal organizations, training partners, juvenile probation, and county child welfare administrators and staff, to develop and review the most recent revisions to the SDM® tools. Revisions to the SDM® tools and policies and procedures will continue to be a topic of discussion in future workgroups with both Tribes and counties. Please refer to the Attachment for details on the enhancements made to the SDM® tools, broken down by each assessment.

Additionally, when it is known or there is reason to know the child is an Indian child, county CWS workers must actively engage the child's Tribe, not only to be in accordance with the ICWA and California Indian child welfare laws, but also to support collaborative assessment and shared decision making whenever possible. To be able to engage in this process, California Tribes must have access to the tools and supports that county CWS workers use to guide their decision making, including the SDM® system. The CDSS has consulted with several Tribes and tribal representatives on the development of an AB 3176 letter series to further provide guidance on all California

Indian child welfare provisions, covering the following key topics which further defines and describes partnership and collaboration with Tribes:

- Inquiry/Further Inquiry/Reason to Believe/Reason to Know/Notice ([ACL No. 23-46](#))
- Emergency Removals/Emergency Placement/Placement Preferences
- ([ACL No. 23-64](#))
- Active Efforts
- Voluntary/Involuntary Proceedings
- Qualified Expert Witness
- Jurisdiction

The SDM® tool updates further align and integrate these policies into practice to meet the following objectives:

- Development of prompts for collaboration, consultation, and joint decision making between county CWS agencies and Tribes, including:
 - Collaborative completion of SDM® Assessments.
 - Completing and sharing SDM® Assessments. (See [ACL No. 18-140](#) for clarification on sharing CWS records with Tribes.)
 - Overall collaborative assessment and shared decision making.
- Increasing ICWA inquiry for all referrals for the earliest possible identification of Indian children **and** the child's Tribe, which is critical so active efforts are successfully made before removal, as required by state and federal law ([ACL No. 23-46](#)).
- Strengthen data entry to better inform reviews of joint decision making for Indian children and families.
- Support improved state, Tribe, and county partnership and training.

ONGOING TRAINING AND TECHNICAL ASSISTANCE

Training and case reviews are integral to ensure proper use of the suite of SDM® tools. Not only should CWS workers understand the proper use of the tools, but CWS supervisors and managers should be familiar with the tools to provide guidance and support to CWS workers. The SDM® Policy and Procedures manual was updated to reflect the updates made to the SDM® suite of assessment tools and give assessment overviews, definitions, sample assessments, and procedures. Handouts and materials that detail highlights of the changes are also available on the [Evident Change California SDM® Training website](#).

Evident Change provides technical assistance to Tribes and county CWS agencies to enable workers to be better engaged with children and families, which supports fair and timely investigations, and clear decision-making recommendations. Training and technical assistance of the SDM® suite of tools supports CWS workers to consistently

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assess and respond to alleged child maltreatment reports received through the hotline as well as assess for safety and risk throughout the life of a case. To inquire about technical assistance or training opportunities, please contact Evident Change's Help Desk at support@evidentchange.org.

If you have any questions or need additional guidance regarding the information in this letter, contact the Family Centered Safety and Support Bureau at childprotection@dss.ca.gov.

Sincerely,

Original Document Signed By

ANGIE SCHWARTZ
Deputy Director
Children and Family Services Division

cc: All Federally Recognized Tribes
All County Chief Probation Officers

Attachment

UPDATES TO THE STRUCTURED DECISION MAKING SUITE OF ASSESSMENT TOOLS

GENERAL

Household Definition:

The definition of “Household” clarifies examples in which non-residents may qualify as household members. It does not functionally change who is considered to be a member of a household, but it seeks to add clarity and examples to support accurate assessment of a child’s current household.

GLOSSARY

The SDM® Assessment Definitions have been integrated and expanded upon as a glossary to better define important terms used across the suite of SDM® assessments.

PRACTICE FOUNDATIONS

A section providing general instructions has been added to support consistency in the use of SDM® assessments.

HOTLINE TOOLS

ICWA Inquiry and Tribal Collaboration:

Adds a question for the Hotline screener to inquire whether a child is, or may be, an Indian child. A prompt was added for the screener to consider whether “reason to know” exists to ensure tribal collaboration and information gathering at screening or “reason to believe” exists, requiring further inquiry. The updates increase alignment with the ICWA and statutory requirements enacted by [AB 3176](#) for the collaborative assessment for tribal children to begin as early as possible. The following corresponding definitions and policy guidance are added in the SDM® Hotline Tools Definitions section:

- Clarifies the duty to inquire begins at initial contact.
- Provides definition of “reason to know” and “reason to believe.”
- Provides instruction on how to locate tribal representatives from the [Bureau of Indian Affairs List of ICWA designees](#).
- Ensures that tribal social workers or representatives are included in the information gathering and screening process, whenever possible, including instructions on documenting the details of the contact in the case management system, currently the Child Welfare Services Case Management System (CWS/CMS), and a summary of what was discussed, as well as efforts made if contact was not successful.

Screening Criteria:

The definition of "no child under age 18" was updated to align with [Welfare and Institutions Code section 16504\(c\)](#). While a referral cannot be created for a nonminor dependent 18 or over, when a report is received alleging abuse, neglect, or exploitation of a nonminor dependent, it is the county CWS agency's responsibility to assess and evaluate for an appropriate response to determine if the placement is safe. When a report is received at the county child protection hotline regarding a nonminor dependent, the screener shall provide the case carrying worker with the necessary information to respond and assess for the nonminor dependent's immediate safety.

Physical Abuse: Caregiver Action

1. An example has been added related to dangerous behaviors in the immediate proximity of the child.
2. The updates describe any household violence by one or more adult household members occurring in ways that the child could be injured, instead of focusing exclusively on incidents related to intimate partner violence.

Emotional Abuse:

1. Changed the item stem of "exposure to domestic violence" to "emotional harm related to domestic violence."
2. The updates to item definition and threshold further clarify the intent for the CWS worker to assess impact on child/emotional harm.

Neglect:

1. Definition of neglect has been updated to align with statutory amendments made to [Penal Code \(PC\) section 11165.2](#), implemented through [AB 2085 \(Chapter 770, Statutes of 2022\)](#) specifying that "general neglect" does not include a parent's economic disadvantage.
2. Revisions to the definition for inadequate medical/mental health care help clarify the expected threshold, specifying that the lack of medical care is causing the child's condition to deteriorate.
3. Failure to protect has been updated to specify that concerns related to domestic violence should be assessed under emotional abuse and physical abuse items.
4. Additional clarification is provided regarding when a child has been exploited by a third party to require the screener to assess for knowledge of protective action by the caregiver.

5. Changed the item stem of "infant exposed to drug/alcohol" to "substance-affected newborn (in-home only)."
 - a. This update aligns with policy changes enacted through amendments to the [Comprehensive Addiction and Recovery Act \(CARA\)](#) and the corresponding guidance set forth in [ACL No.'s 17-92](#) and [20-122](#) related to infants affected by substance use and plans of safe care.

Sexual Exploitation:

The definition of a child/youth being exploited or trafficked has been updated to align with the updates under "failure to protect" regarding the extent to which a caregiver has acted protectively or has the ability to protect.

Tribal Agreement with Screening Decision:

- a. While agreement with the decision is not required, it is recommended as a best practice to engage and collaborate with Tribes to reach a consensus whenever possible.
 - b. In the absence of an agreed upon decision, this portion of the tool allows for the disagreement to be documented.
2. The collaborative assessment as well as the Tribe's position should also be documented in CWS/CMS.

Overrides:

"Interview per local protocol" definition for an in-person response has been updated and expanded to include "Tribal Agency Request." Overrides should be utilized when the concern being reported at the county CWS hotline does not meet criteria for an in-person response. If a local protocol exists within the county CWS agency that determines that a Tribe may request a courtesy interview for in-person CWS response, the agency may override the tool's decision to evaluate out.

SAFETY ASSESSMENT

Which Cases:

1. Additional clarification was added to specify that the SDM® Safety Assessment is not appropriate for the following:
 - a. An in-person response is required for an incident involving *only* a third-party perpetrator of sexual exploitation, and there are no allegations regarding the caregiver.

- b. A child fatality is suspected to be a result of abuse or neglect **AND** there are no remaining minor children in the household.
- c. The SDM® policy clarifies that safety assessments must be completed on allegation households. When responding "no" to the question, "Were there allegations in this household?" an automated prompt in WebSDM will link the worker to the SDM® policy stating that a safety assessment must also be completed on the allegation household.

ICWA Inquiry and Collaborative Assessment with Tribe(s)

1. The SDM questions are added to prompt the CWS worker to indicate whether there is any information indicating whether a child within the household is, or may be, an Indian child.
2. Definitions to support the CWS worker in identifying "reason to know" or "reason to believe" were added.
3. To ensure tribal collaboration, an additional prompt was added for the CWS worker to collaborate with the Tribe(s) in the information gathering and safety assessment completion and safety plan development process if it is known or there is reason to know the child is an Indian child.
 - a. Instructions are added for the CWS worker to document the attempts made to contact and collaborate with the Tribe(s) to support shared decision making.

Safety Threats:

Several significant changes were made to this section.

Safety Threat Number One: Caregiver caused serious physical harm to the child or made a plausible threat to cause serious physical harm in the current investigation, as indicated by.

1. Definition of "serious injury or abuse to the child other than accidental" was expanded to include "or would have required medical treatment had a serious injury occurred."
2. Definition of "drug/alcohol-exposed infant" changed to "substance affected infant." This safety threat only applies when factors exist that create imminent danger to the infant.
 - a. Updates to this definition align with [Comprehension Addiction and Recovery Act, ACL No.'s 17-92](#) and [20-122](#), and [Penal Code \(PC\) section 11165.13](#).

Safety Threat Number Two: Child sexual abuse or sexual exploitation is suspected, and circumstances suggest that the child's safety may be of immediate concern.

1. Sexual abuse and sexual exploitation are now two separate subitems.

Safety Threat Number Three: Caregiver does not meet the child's immediate needs, resulting in serious harm or imminent danger of serious harm.

Statewide data indicates this safety threat continues to be the most prevalent safety threat in removal households for concerns that may largely be associated with lack of resources/poverty.

1. Updates to this item better align with changes to [PC section 11165.2](#), implemented through [AB 2085](#), clarifying general neglect does not include a caregiver's economic disadvantage.
2. Items are broken out into separate categories of "supervision," "food or clothing/hygiene," "medical or dental care," and "mental health," to support improved data collection and closer examination of the way this safety threat is being selected.

Safety Threat Number Five: Caregiver describes or speaks to the child in predominantly negative terms or acts toward or in the presence of the child in negative ways and these actions result in severe psychological/emotional harm resulting in imminent danger.

1. Adds "resulting in imminent danger" to the safety threat item.
2. Examples are added to better clarify what factors meet the threshold for severe emotional harm.

Safety Threat Number Six: Caregiver does not protect the child from serious harm or threatened harm by others. This may include physical abuse, sexual abuse, or neglect.

1. Adds clarification that this safety threat should not be selected regarding concerns of domestic violence.

(New) *Safety Threat Number Nine: Domestic violence exists in the household and poses an imminent danger of serious harm to the child.*

1. Supports correct use and application of concerns related to domestic violence; these were previously embedded within safety threat 1 (physical harm) and safety threat 5 (emotional harm). Subitems are added to track physical harm versus emotional harm.

2. New definitions of physical and emotional abuse align more closely with survivor-centered practice, the Integrated Core Practice Model, and Safety Organized Practice, applying SDM® definitions based on perpetrator behavior.

(Removed) Safety Threat Number Nine. *Current circumstance combined with past history.*

A review of data flagged this item as significantly over-selected for American Indian/Alaskan Native households in California. Evident Change testing and review of these definitions indicate similar concerns across jurisdictions with this item in place. This safety threat has been removed from California's assessment.

Safety Threat Number Ten. Other: *Current circumstances meet the threshold of imminent and severe danger but are not described within safety threats 1-9.*

Removal considerations based on past harm and circumstances not already described in safety threats 1-9 should be captured under safety threat 10, which requires an explanation and supervisor approval.

Caregiver Complicating Behaviors:

The definitions in this section were updated to build consistency across all definitions and to clarify the CWS worker should be focusing on present factors.

In-Home Protective Interventions:

1. Language is now inclusive of ensuring CWS workers are utilizing tribal resources in collaboration and engagement with Tribes when implementing safety interventions.
2. Language is added to clarify that safety plans must also be monitored and supported by network members.
3. Language is added that a plan of safe care to address the immediate needs of a substance-affected infant is considered an appropriate safety intervention.

The revisions for interventions 11 and 12 more closely align with California practice related to exigency and seeking warrants.

4. Protective intervention 11 has been changed from “child placed in protective custody because interventions 1-10 do not adequately ensure the child’s safety” to “a warrant or detention order will immediately be sought per local policy.”
 - a. This update is to be used on households that have been assessed to be unsafe and a warrant or detention order will be sought immediately.

5. Protective intervention 12 has been added to indicate a “child placed in protective custody.”

Tribal Agreement with Safety Decision

This new section was added to indicate a tribal agreement with the safety decision, when known. While agreement with the decision between the county CWS agency and Tribe(s) is not required, all efforts made to gain agreement and the Tribe’s position on the final safety decision should be documented in CWS/CMS.

RISK ASSESSMENT

Which Cases:

Revisions clarify that risk assessments should not be completed for the following:

1. Sexual exploitation referrals involving only third-party perpetrators (no allegations exist regarding the caregiver).
2. Child fatalities when there are no remaining minor children in the household.
3. Referrals regarding allegations in out-of-home care.
4. The requirement to complete a new risk assessment for new referrals on open cases has been removed.
 - a. For newly assigned referrals on open cases, the SDM® Risk Reassessment should be completed.

Recommended Decision:

This section is now displayed as a matrix showing the intersection of safety and risk.

(New) Planned Action:

Close without intervention:

Clarifies that families considered safe and that have low or moderate risk levels should not be considered for formal CWS intervention. The addition specifies that these families may benefit from increased connections to natural support networks and community prevention services.

Refer to services as primary intervention:

Clarifies that families considered safe and that have high/very high-risk levels may benefit from prevention or community service intervention options to better align with the

[Family First Prevention Services Act](#) and as outlined in the state's Five-Year Prevention Plan¹.

Open for child welfare services case:

Clarifies the possible interventions for families that require a CWS case be opened under either family maintenance services (either voluntary or court-ordered) or out-of-home intervention.

NOTE: WebSDM has updated data fields that will support tracking and evaluation of the planned intervention post-investigation, including referrals to community services.

STRUCTURED DECISION MAKING® REUNIFICATION REASSESSMENT

1. The purpose of this assessment has been expanded to include to “pursue permanency alternative.”
2. The policy and procedures have been updated to clarify the completion requirements of the reunification reassessment to assess a safe return home at a minimum of every six months from the point of removal. This change de-links SDM® policy for completion of the assessment from court and case plan progress.

¹ [California's Five-Year State Prevention Plan](#)

Attachment C –
California SDM V3.5
Assessment Updates

CALIFORNIA SDM® V3.5 ASSESSMENT UPDATES

NOTICE AND IMPLEMENTATION PLANNING

Updates to the California Structured Decision Making® (SDM) assessment system (SDM V3.5) went live in WebSDM for users on January 3, 2024. These updates include foundational changes to key policies, assessment items, and item definitions in the following SDM assessments.

- SDM hotline tools
- SDM safety assessment
- SDM safety assessment for congregate care settings
- SDM risk assessment (policy only)
- SDM reunification assessment (policy only)

During initial implementation, each county SDM Core Team representative is asked to continue to check in with local program managers and administrators to ensure staff are supported in using the updated assessments and have easy access to all statewide materials for training and implementation support.

Since these updates include foundational changes to key items and definitions throughout the SDM assessments, it is critical that your county's management, supervisory, and training teams review the changes as well. If you have not yet done so, please review the [SDM V3.5 Updates Overview](#) with your team. Opportunities for statewide training and implementation support over the next year are detailed below. Please help us by sharing these training opportunities widely with your teams.

Training questions or requests for technical assistance or support should be directed to Evident Change's California Practice Team at caprojects@evidentchange.org

For specifics related to the updated assessments in WebSDM, please email our Web Applications team directly at support@evidentchange.org, using the "Contact Help Desk" link in WebSDM.

KEY DATES FOR IMPLEMENTATION

Now	<p>A detailed overview of the updates planned for each SDM assessment is available to SDM Core Team members, program managers and supervisors, and training staff statewide. This overview includes links to the pending version of each assessment, with all updated language highlighted for easy review.</p> <p>The SDM Safety Assessment for Congregate Care Pre-Implementation Checklist should be reviewed by county leadership to support planning for policy, data, or practice changes.</p>
November 1, 2023	Recorded micro-learnings reviewing the key changes on each assessment will be available statewide on the California SDM Training Materials Site . These micro-learnings are 5–10 minutes long and should be viewed by any staff or supervisor using each assessment <i>prior</i> to the updates going live in WebSDM.
December 1, 2023	The full updated SDM Policy and Procedures Manual will be distributed to SDM Core Team members and statewide trainers in advance of deployment. It is also posted on the California Training material site and in WebSDM.
January 2, 2024	All County Letters, ACL 23-101 , and ACL 23-102 , are released. Updates deploy January 2, and are live in WebSDM for users on January 3, 2024.

COMPREHENSIVE TRAINING OPPORTUNITIES

TRAINING	DATES	DESCRIPTION
Foundational micro-learnings for each updated assessment	Available on demand beginning November 1, 2023.	Web-based recorded videos that review the changes made on each assessment will be available before deployment and will remain available as staff become familiar with the updates. Recorded micro-learnings on each assessment can be accessed through the California SDM Training Materials Site .
SDM Safety Assessment for Congregate Care Settings Foundational Training	Live webinars <ul style="list-style-type: none"> October 4, 9:00 a.m. – 12:00 p.m. October 12, 1:00–4:00 p.m. A recording of this training is available for on-demand viewing here .	The SDM Safety Assessment for Congregate Care Settings Foundational Training is a comprehensive course that provides participants with an understanding of the safety assessment for congregate care settings. This training will support workers in developing the skills they need to assess for safety when there are allegations of abuse or neglect of a dependent or ward youth in out-of-home care placed in a group home or congregate care setting.
	Post-Implementation Coaching Calls	Post-Implementation virtual coaching calls will be held through March 2024 to support the early implementation of this assessment.

TRAINING	DATES	DESCRIPTION
Collaborative Assessment and Shared Decision Making With Tribes	<p>Six virtual sessions will be held regionally between counties and tribes.</p> <ul style="list-style-type: none"> January 23, 2024, 9 a.m. – 12 p.m.: Northern Region January 24, 2024, 9 a.m. – 12 p.m.: Bay Area February 7, 2024, 9 a.m. – 12 p.m.; Central Region February 8, 2024, 9 a.m. – 12 p.m.; Los Angeles March 6, 2024, 9 a.m. – 12 p.m.; Southern Region March 7, 2024, 9 a.m. – 12 p.m.; Statewide 	<p>Updates to the SDM hotline tools and SDM safety assessment increase alignment with state requirements for collaborative assessment and shared decision making between counties and tribes for American Indian/Alaskan Native children and families involved in California’s child welfare system to begin as early as possible, as required by AB 3176.</p> <p>To support best practice related to collaborative assessment and shared decision making, a series of joint trainings will be held across counties and tribes. These trainings will reinforce minimum requirements as required by state and federal policy and explore best practice in collaborative SDM assessment.</p>
Assessing Intimate Partner Violence With SDM Tools and SOP	<p>Virtual training sessions will be held on the following dates.</p> <ul style="list-style-type: none"> November 13, 1:00–4:00 p.m. January 26, 9:00 a.m. – 12:00 p.m. February 5, 1:00–4:00 p.m. February 22, 10:00 a.m. – 1:00 p.m. 	<p>Assessing Intimate Partner Violence With SDM Tools and SOP is a training intended to support fidelity implementation of updated SDM tools and best practice related to assessing child welfare decision making related to intimate partner violence using SDM tools and Safety-Organized Practice (SOP). Facilitators will engage participants in critical thinking about their practice when there is a pattern of coercive control and violence, support participant awareness of their implicit bias, and review traditional and safety-organized techniques when working with alleged perpetrators.</p>

OPPORTUNITIES FOR BUILDING LOCAL TRAINER AND STAFF DEVELOPMENT CAPACITY

- Quarterly SDM trainer forums: See [flyer](#) for dates and registration.
- Annual [SDM train the trainer series](#): **Save the Dates!** January 24th, January 31st, February 7th, and February 14th
- Additional technical assistance or practice coaching can be requested from your local Regional Training Academy or Evident Change.