

## Review Criteria

Conceptual Integrity – Comparison to State of the Art – Precision and Clarity – Extent of Direction

NRCCPS

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# Summary of Observations and Opinions<sup>1</sup>

## Introduction

This policy review was conducted strictly in relationship to safety intervention occurring in conjunction with investigation. It was based on the application of these criteria:

- Conceptual Integrity – Does policy provide a conceptual base for safety intervention? Are concepts correctly defined within policy? Are concepts correctly represented and consistently applied throughout policy?
- Comparison to State of the Art – Does policy represent an approach to safety intervention that is generally consistent with common design, practices and decision making? Does policy include concepts, process, practice and decision making which are current with the evolving state of the art?
- Precision and Clarity – Is policy meticulous in assuring that concepts, terms, references, language, requirements, expectations are understandable, consistent, exact and clear?
- Extent of Direction – Does policy provide exact requirements and expectations? Does policy prescribe what each requirement is; when it occurs; how it is to be accomplished; and what results are expected?

These criteria served as reference points in the line by line review of the policies provided to NRCCPS by the Department. Commentary was completed on all policies and is provided to the Department as the more substantive, detailed observations and opinions. Where commentary does not occur it should be assumed that provisions meet the review criteria or the provisions are not specifically relevant to this review.

## Summary

### *Conceptual Integrity*

The policy articulates a conceptual base and represents the concepts correctly in general. The policy projects the Components of Safety as the cornerstone of the safety intervention approach. The use of the Components of Safety is advanced throughout policy but not well explained in terms of how it is to be applied. There is some confusion about concepts and terms which could partly be editorial. There are several references to what seems to be the same concept – impending danger (see safety threats, safety factors, threat of severe harm, emerging danger, etc.) The policy identifies the essential concepts to safety intervention. Policy also

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<sup>1</sup> The Department is encouraged to refer to the NRCCPS Safety Intervention Policy Standards and Agency Self-Assessment as a prospective resource. [http://www.nrccps.org/resources/safety\\_intervention\\_standards.php](http://www.nrccps.org/resources/safety_intervention_standards.php)

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identifies some concepts which are part of the model design that are unusual (e.g., final safety decision for instance.)

The conclusive observation is that while concepts are articulated and consistently represented, policy might be stronger in guiding casework if more was done to demonstrate the relevance and application of concepts across the safety intervention process in specific ways. For instance, impending danger is correctly defined and described. However, when impending danger is relevant to the safety intervention process is not explained and requirements associated with considering the concept in practice and decision making is not obvious.

#### *Comparison to State of the Art*

The policy describes and represents an approach to safety intervention that is generally consistent with common design, practices and decision making existing within the state of the art.<sup>2</sup> In some ways draft policy (11/09) establishes a conceptual base that moves beyond what is apparent in some agencies. Safety assessment is designed similarly to methods and instruments that are now well established as representative of the state of the art. This includes the list of impending danger threats. Although some specific areas on the safety assessment are illustrative of dated thinking, they also remain in existence in other models (e.g., including “Other” within the impending danger threat list.) One aspect of the Department’s model that is distinctly different is the blending of safety assessment and safety planning including reaching a final safety decision after the safety plan is established. This is not a scheme we have encountered anywhere else. In the past some models included a safety intervention response provision within their safety assessments. However, that idea has become less apparent among models. The state of the art is moving toward clearer distinction between safety assessment (i.e., reaching a conclusion about the existence of impending danger) and safety analysis (i.e., determining the least intrusive safety plan) and safety planning (i.e., the actual creation and establishment of a safety plan.) The construction and content that forms the Departments draft safety plan is consistent with the state of the art.

The state of the art has moved from a focus on safety within the first week of contact with a family to focused assessments along the intervention process – each guided by what is known about a family in relationship to present danger and impending danger. Policy alludes to this kind of assessment process but is not precise or clear about it. The policy correctly emphasizes a focus on safety routinely throughout the intervention process; however, sometimes there is vagueness as to how this will occur with respect to present danger and impending danger.

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<sup>2</sup> While this review concentrated on the state of the art as applied to safety intervention occurring during the investigation, it is noted that safety intervention model development is now proceeding to focus on ongoing CPS especially concerned with the ASFA requirement to address safety concerns in case planning and progress measurement.

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Additionally the process is not ultimately explained with respect to how judgments are made about safety in relationship to the kind of information that is expected to be gathered for that purpose. Increasingly safety models are explicit about information standards – what is expected to be collected and known about a family. In particular regarding the intervention process, it is not absolutely clear that workers are required to go on record officially about safety and safety management at the conclusion of the investigation.

Traditionally the state of the art considered foster care placement as a sort of free standing option during CPS intervention. In other words (prior to the formalization of safety planning), the response to the safety decision was bi-lateral: if a child was judged to be safe he remained at home and if a child was judged to be unsafe he was removed. The state of the art now considers safety intervention/safety management as multi-optional. Additionally it operates from the least intrusive principle. These two influences means that safety models ever increasingly are embracing safety responses as best when they are creative along a continuum of options. The continuum begins with in home safety plans and continues through various combinations of in home and out of home options to totally out of home options some of which even restrict the nature and kind of caretaker – child contact. This emerging way of thinking includes any kind of placement as existing as the safety plan. The Department’s policy communicates the former conception of placement – and in particular foster care – as being something different than a safety plan. This seems to be the most obvious difference in the Department’s safety intervention model when compared to the state of the art.

In general it can be concluded that policy related to concepts, process, practice and decision making are in line with the evolving state of the art. To a large extent variations that exist could likely be remedied through editing and refinement in how things are described, explained and required.

#### *Precision and Clarity*

Generally speaking the policy is understandable explaining things in ways that are communicated well enough. However there are opportunities for enhancement when it comes to perspicuity. There are formidable challenges in policy writing. Policy must provide direction to inexperienced, newly hired staff. However, policy must also provide direction to tenured staff that may have significant experience in a former way of doing safety intervention. Both these challenges emphasize how crucial it is for policy to be as precise and clear in definitions, conceptual representation, descriptions of the work to be done and specific requirements that are expected. The underpinning issue is consistency. So, the precision and clarity emphasized here is also judged by how consistently it occurs throughout all of policy.

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The line by line commentary will provide specific feedback where precision and clarity are brought into question. While it can be concluded that consistency and reinforcement exists in conceptual thinking, intent and general expectations; it also can be concluded that there is some need for improving precision and clarity in the details of policy. Mainly the issue is one that requires 1) reconciling where any confusion or inconsistency exists regarding how ideas, concepts, terms, definitions and so forth are represented and 2) editing to assure correct and absolute consistency in how the content and requirements in policy are communicated.

#### *Extent of Direction*

This criterion brings into question what one considers to be the purpose of policy. That question has an associated question: What content should be included in policy to meet the purpose? At the NRCCPS we have approached policy as being best when it provides exact direction about what is required of a CPS worker to effectively perform safety intervention. Such a point of view results in considering policy as that which identifies specifically step by step what a worker must do. This distinguishes policy from procedures which is how the worker proceeds – how to do what is required. Additionally this distinguishes policy from guides, training curricula and supervision that informs workers and brings to life how policy and procedure are to be implemented.

The Department's policy varies in meeting the standard described in the above paragraph. Surely there are specific requirements identified. However, there is an abundance of other kinds of content: informational, values and beliefs, educational, etc. In the policies reviewed, the step by step requirements of what a worker is to do in safety intervention is not laid out in an organized manner. For example, the Components of Safety is a profound foundational concept that pervades policy. Workers are admonished to consider these components to reach critical decisions. However, specifically when the components are to be considered; how they are to be considered; and how they are to be applied is not readily evident or explained in policy.

Safety intervention is linear. This includes information collection; decision making; and response. Safety intervention can be lined out neatly along the traditional CPS case process. There are discrete requirements for information collection, analysis, decision making and response beginning with the receipt of the referral proceeding through initial contact, during investigation and concluding with the completion of the investigation. (Of course the process is just as specific as it proceeds on into and through ongoing CPS.) This reality is what guides workers as they move forward and supports accountability with respect to adherence to policy. It could be that this kind of structure within policy is contained in documents that were not provided for this review. Recognizing that, the opinion here is that such structure does not exist within the policy that was reviewed.