

**SANTA CLARA COUNTY: 2007 PLAN
TO ADDRESS ETHNIC DISPROPORTIONALITY
IN CHILD WELFARE SERVICES**

INDICATORS

Overall, children in Santa Clara County are referred by mandated reporters and others in the community for investigation of abuse or neglect at a rate significantly below the state as a whole. In 2005¹:

Referrals per 1,000 children

California	50.1
Santa Clara County	32.2

However, when broken down by ethnicity, African-American and Latino children are referred more frequently in Santa Clara County than statewide, and Native American,² Asian/Pacific Islander and white children are referred less frequently:

Referrals per 1,000 children

	<u>Santa Clara</u>	<u>California</u>
African-American	105.3	96.6
Latino	51.8	45.7
Native American	35.4	52.5
Asian/Pacific Islander	14.9	17.4
White	21.9	44.2

Overall, referrals in Santa Clara County are substantiated at the same rate as they are statewide, but removals from home to out-of-home care occur at lower rates but similar percentages of substantiations:

¹ 2005 is the last year for which complete data is available for both the state and the county.

² The actual number of Native American children in the Santa Clara County child welfare program is so small that percentage data is not statistically significant.

**Referrals, Substantiations, and Removals
per 1,000 children in the population
2005**

	<u>Referrals per 1,000</u>	<u>Substantiations per 1,000</u>	<u>Substantiations as % of Referrals</u>	<u>Entries & Reentries per 1,000 & as % of Substantiations</u>	
California	50.1	11.3	22.5%	3.7	33%
Santa Clara County	32.2	7.3	22.5%	2.5	34.8%

In Santa Clara County, the percentage of referrals being substantiated grew between 2001 and 2005 for all ethnic groups except Native Americans:

**Santa Clara County – Substantiations by Ethnicity
(as a percentage of referrals)**

	<u>2001</u>	<u>2005</u>
African-American	22.6%	30.3%
Latino	22.2%	25%
Native American	30.2%	20.9%
Asian/Pacific Islander	14.9%	16.7%
White	17.3%	19.4%

However, over the same period the percentage of substantiated referrals that resulted in removal of the child to out-of-home care declined for all ethnic groups except Native Americans and whites:

**Santa Clara County – First Entries by Ethnicity
(as a percentage of substantiated referrals)**

	<u>2001</u>	<u>2005</u>
African-American	37.5%	25.1%
Latino	33.2%	26.5%
Native American	50.0%	66.7%
Asian/Pacific Islander	30.3%	23.5%
White	32.9%	34.8%

(Additionally, a work group from the Children of Color Task Force obtained court permission to conduct file reviews on a random sample of twenty-five substantiated

referrals from the month of April 2006 to determine whether any patterns emerged suggesting bias in the decision-making that resulted in substantiation. Broadly, the reviewers did not report seeing patterns of bias leading to unwarranted substantiation, but they did note several other features of case handling that could affect practice or outcomes.)³

Taken together, the aggregate referral/substantiation/removal data, and the case file reviews leads the Agency to the following operating plan for 2007 to address the issues involved in disproportionality.

2007 DISPROPORTIONALITY PLAN

The 2007 Disproportionality Plan has three parallel components – program activities, staff training, and management oversight, and addresses actions starting from the first Agency contact with a referral through to the conclusion of contact. A fourth component addresses the Agency’s role in influencing larger community responses to families in need.

Program Activities:

1. Referral Screening:
 - a. The Agency will continue to identify “evaluated out” referrals for inclusion in the Path 1 Differential Response⁴ program. The Path 1 pilot program will be evaluated in July 2007, and depending upon demonstrated outcomes, funding for continuation or expansion will be sought.
 - b. The Child Abuse and Neglect Center hotline will begin full utilization of the Comprehensive Assessment Tool as a standardized instrument in March 2007. The instrument’s use will

³ Although the sample size was too small to suggest generalizing from a limited number of anecdotes, they are listed here as they may suggest areas for attention:

- Varying levels of description of circumstances.
- Unclear standards for use of classifications – “emotional abuse,” “general neglect,” and “severe neglect.”
- Infrequent references to cultural factors that might provide useful understanding of the family’s ability to benefit from particular services.
- Infrequent references to family strengths.
- Unclear basis for determining which families are referred into voluntary, non-court services.
- Instances where the referred child was appropriately substantiated, but dependency was sought on siblings who did not appear from case file documentation to themselves have been at imminent risk of abuse or neglect.
- Some families that had been previously referred but not substantiated might have benefited from early provision of supportive service.

⁴ Differential Response programs are operated by community agencies under contract with SSA. The Agency also operates other non-court alternative service programs – Informal Supervision, Voluntary Family Reunification, and Voluntary Family Maintenance.

reduce worker-by-worker variation in how reports are categorized and evaluated for further emergency response.

2. **Joint Response:**
 - a. The Joint Response program with law enforcement has been expanded to the whole county, including the last two jurisdictions, Gilroy and the Sheriff/unincorporated area, with the goal that all child welfare investigations are conducted with social worker involvement.
3. **Emergency Response and Dependency Investigation:**
 - a. The Emergency Response program will begin full utilization of the Comprehensive Assessment Tool as a standardized instrument in March 2007. The instrument's use will be monitored to ensure that inconsistent terminology and descriptions are minimized, and that relevant references to family strengths and cultural assets are being noted and considered in assessments.
 - b. The Emergency Response program will implement Team Decision Making procedures in the first half of calendar 2007 to consider removal decisions and possible alternatives to out-of-home dependency services. Additional resources will be assigned as necessary to ensure that TDMs do not impede the Agency meeting mandated emergency response time limits.
 - c. The Agency's Sibling Protocol will be reviewed with the Juvenile Court and other stakeholders to ensure that siblings who are not at imminent risk are not unnecessarily included in protective activities. A work group will be created to review sibling removals and develop staff information and training on how particular situations could be handled better.
 - d. The Agency will continue to identify substantiated cases that can be referred safely to Differential Response Path 2 or other voluntary services, and will assign a social work coordinator to provide overall Path 2 direction. The expanded Path 2 program will be evaluated in July 2007, and depending upon demonstrated outcomes, funding for continuation or expansion will be sought.
 - e. Requests for DFCS court recommendations for By-pass of Family Reunification Services will continue to be subject to the individual case-by-case approval of the Director of DFCS.
4. **Reunification Services:**
 - a. The Comprehensive Assessment Tool will be utilized in all cases for the development of the family reunification plan.
 - b. Particular emphasis will be placed upon referring parents for behavioral health services when that is indicated, and the Agency will designate single points of contact with the behavioral health agencies to ensure clients receive priority access to services.
 - c. The Agency will maintain its support of the Juvenile Dependency Drug Court and will do what is necessary to ensure that adequate

assessment and case management resources are available to the court.⁵

- d. The Agency will also strengthen linkages between DFCS and the CalWORKs program to ensure that income needs of families are being addressed in cases where there may be eligibility for cash aid.
5. Placement:
 - a. In cases where out-of-home care is necessary, the Agency will make it a priority to engage in family-finding to maintain the high level of placement with relatives or non-relative extended family members (NREFMs).
6. Reunification:
 - a. To increase the numbers of safe reunifications and reduce the numbers of children who return to foster care after failed reunification, the Agency will implement a Differential Response Path 4, to provide supportive services to reunified families after the expiration of time limited Family Maintenance Services. Path 4 services will commence by December 2007.
7. Permanency:
 - a. In cases where reunification is not possible, the Agency's priority for permanent placement is adoption or guardianship by relatives or NREFMs.

Staff Activities:

1. All social work staff will complete Comprehensive Assessment Tool training by March 1, 2007. Refresher trainings will be provided on an as-needed basis throughout the calendar year to ensure effective utilization.
2. All social work staff will complete special training on factors of race, class and culture as they may affect perceptions of family and child well-being in the first half of calendar 2007. The subject matter will be integrated into induction training for new social work staff.
3. All social work staff will receive updated training on availability of alternative services to dependency, and on accessing behavioral health services in the first half of calendar 2007.

Management Oversight:

1. By July 1, 2007, the Agency will develop a system of monthly data reporting to track outcomes and trends, by unit and worker, related to the following:
 - a. Substantiation rates by ethnicity;

⁵ An article to be published in the February 2007 issue of Child Maltreatment, "How Effective are Family Treatment Drug Courts? Outcomes From a Four-Site National Study," by Beth Green, et al, points to positive outcomes in terms of higher rates of successful reunifications and lower rates of subsequent CPS referrals from the four-site study. Santa Clara County was one of the sites studied.

- b. Inclusion of siblings in dependency activity;
 - c. Rates of referral to Differential Response and other non-court alternative services by ethnicity;
 - d. Penetration rates and speed of service for referrals to behavioral health services; and
 - e. Reunification rates by ethnicity.
2. The Agency will continue to emphasize research into evidence-based practice, and will include dissemination of best or promising practices in ongoing staff training.

Agency Advocacy:

1. The Agency will continue to work with the FIRST 5 High Risk Design initiative to implement preventive services in neighborhoods of high cumulative risk factors.
2. The Agency will work with interested parties on plans to develop preventive programs and interventions to address the problem of Substance Exposed Infants.