

SOUTH CAROLINA DEPARTMENT OF SOCIAL SERVICES

PLAN FOR ATTAINMENT OF CHILD WELFARE CASELOAD LIMITS

I. The Child Welfare Reform Vision

DSS leadership is deeply committed to reforming child welfare in South Carolina on behalf of all children in foster care and recognizes that the needed reform is much broader than the specific provisions of the Michelle H. Final Settlement Agreement (FSA). The following Implementation Plan is submitted in response to one specific provision of the Michelle H. Final Settlement Agreement (FSA) - Workload Limits for Foster Care (FSA IV.A.2); however, DSS leadership feels strongly that the work committed to in this plan, along with the ones for caseworker/child visitation, family visitation, out of home investigations, healthcare, and placement needs, must occur as a part of a comprehensive reform effort.

DSS leadership believes that there are three primary drivers which will make the most significant impact on child welfare reform in SC. They are a well-qualified, stable workforce; a strong and well-defined framework of family-centered practice; and a network of resources and supports for families and children that includes prevention as well as child maltreatment intervention and placement services. None of these will be easy to accomplish. Indeed, they reflect needs that many, if not most, child welfare systems in the United States and other developed countries struggle to fulfill. There are, however, some immediate steps that DSS can take to begin this journey and to expedite reform benefits to our service population, including the Michelle H. class members. Among those, taking actions to achieve reasonable workload standards, to stabilize the front-line workforce, and to strengthen its knowledge and skills are a priority. This priority recognizes that, in child welfare, there is absolutely no substitute for a stable, sufficient, and high-quality front-line workforce. Steps to be taken toward achieving such a workforce and meeting specific measurable workload standards are reflected in this document, with emphasis on those that directly pertain to Michelle H. class members and are thus subject to monitoring by the court.

This plan will serve as a guide to the work ahead and in our communication with staff, stakeholders, and the legislature about what will be involved and required to meet the Final Settlement Agreement (FSA) requirements, and as a blueprint for tracking progress and accountability.

II. The Implementation Planning Process

The workforce and workload implementation plan described here is the product of two internal work groups, one on staff recruitment and retention and one on caseload/workload, which worked with the support and input of an external consultant. Members of each of the workgroups were selected for their competence and experience as child welfare practitioners, managers, and providers of key support functions such as information technology, data analysis, and accountability. These workgroups will meet throughout the life of the reforms to review data, to create action plans for specific strategies, to oversee their implementation, and to amend or re-think strategies, where necessary. In addition to the workgroups, there will be weekly calls with state, regional, and county level child welfare leadership (as needed), monthly senior management team meetings, and monthly performance and accountability meetings to oversee these efforts. Once hired, the Department will utilize its new Child Welfare Workforce Developer to lead the workgroup, create and sustain university partnerships, and track overall progress toward the reforms described in this plan.

III. The Workload Limits for Children in DSS Custody and Their Families

This section outlines the caseload standards, definitions, and targets for compliance with the following requirement:

Requirement: Defendants shall develop an Implementation Plan to achieve the final targets in this subsection. The Implementation Plan shall have enforceable interim benchmarks with specific timelines, subject to consent by the Plaintiffs and approval by the co-monitors, to measure progress in achieving the final targets in this subsection.

A. Standards

The approved standards are as follows:

Supervisors:

- Foster Care Supervisor - 1 supervisor: 5 caseworkers
- Adoption Supervisor - 1 supervisor: 5 caseworkers
- Intensive Foster Care and Clinical Services: 1 supervisor: 5 caseworkers
- OHAN Supervisor - 1 supervisor: 6 investigators

Caseworkers: Pure Caseload Standards*:

- Foster Care Caseworker – 1 caseworker: 15 children
- Adoption Caseworker – 1 caseworker: 17 children with a reduction to 15 once the transition to eliminate contemporaneous assignment of a foster care and adoptions

caseworker to the same child are implemented (see discussion of phases of this transition).

- Intensive Foster Care and Clinical Services: 1 caseworker: 9¹ children
- OHAN investigator – 1 caseworker: 8 investigations

*A pure caseload means one where a particular caseworker only has one type of case on his/her caseload. For instance, a caseworker with a caseload of only foster care cases is carrying a pure caseload. The Co-Monitors have approved the pure caseload standards based on the work of the Workload Estimation Study and nationally recognized standards.

South Carolina law currently requires that DSS have designated adoption services. Based on the interpretation of this requirement in the context of the need to ensure best use of all casework personnel, DSS plans to work to eliminate the practice of dual assignment of children who are legally free for adoption to both foster care and adoption caseworkers and assign full case carrying responsibility to the adoption caseworker. This change is being made in phases based on children's permanency plan, placement, and legal status. Phases 1 and 2 are underway. Phase 1 calls for reassignment to adoption of all children with a plan of adoption who are legally free and in a pre-adoptive placement with a signed adoption agreement. Phase 2 pertains to reassignment of all siblings of children in phase 1 who are not themselves in a pre-adoptive placement. For continuity of care and to maintain relationships, children in these and subsequent phases will be assigned to their current adoptions caseworker. Additional descriptions of the phases and timelines are detailed in the Short-Term Strategies section. Once transition is finalized, all children will be assigned to adoptions caseworkers once they are legally free for adoption. At that point, adoptions caseworkers would have the same caseload standard as foster care caseworkers.

Intensive Foster Care and Clinical Services (IFCCS) cases are currently carried in specialized caseloads except in situations where sufficient IFCCS caseworkers are not available in the county. IFCCS caseloads have a standard of nine children. The workforce assessment completed in October 2018 recommended that DSS consider eliminating these specialized caseloads. This recommendation was based on the fact that currently, there is no specific requirement that IFCCS caseworkers have any higher level of experience or training than other caseworkers and that the assignment of caseworkers based solely on the needs of the child detracts from an emphasis on a family-centered approach which is essential to timely permanency planning. The consultant's report further stated that, while diligent oversight of all children in out of home care is a critical and essential function, it is the needs of the

¹ Should DSS eliminate the IFCCS workload category, these staff would be held to the Foster Care Caseworker standard of 15 children.

parents that must be addressed aggressively and expeditiously if the issues that called for out of home placement are to be resolved and the child either returned home or moved to another safe permanent family outside of the foster care system. All staff overseeing children in out of home care should have the ability (and the directive) to plan frequency of visits and services based on the child's individual needs whether those are related to children's behavior and development, current events or circumstances, needs in the foster family, or the progress of the permanent plan. Actions to move IFCCS children into generalized caseloads will, however, require that DSS first identify the specific activities currently performed by these staff that are documented to claim Medicaid or other unique funding for services to this population and determine how that claiming can be established for all eligible activities by all caseworkers. Eliminating the IFCCS worker classification and dispersing IFCCS caseloads are also complicated by the fact that, currently, IFCCS caseworkers are paid at a higher rate than those managing caseloads in general foster care. The average salary for those in IFCCS is \$37,064 compared to \$35,559 for others. Given the complexities of this change, the Department will complete the necessary research and decide whether to move forward or not by May 31, 2019. The Department acknowledges that a transition plan will need to be developed if IFCCS is eliminated as a workload category. This plan will be completed by August 30, 2019.

Final Targets:

1. (A.2.b) At least 90% of Workers and Worker supervisors shall have a workload within the applicable Workload Limit.
2. (A.2.c) No Worker or Worker's supervisor shall have more than 125% of the applicable Workload Limit.

Definitions:

- Worker is defined in the FSA to mean any employee of DSS that provides direct case management, supervision, or provides permanency services to a Class Member, or investigates one or more accepted reports of abuse or neglect about a Class Member. Based on this definition, DSS will apply workload limits to any caseworker who has a foster care, adoption, or out of home abuse and neglect (OHAN) case on his/her caseload and his/her supervisor.

Mixed Caseload Methodology

A mixed caseload is one in which a particular caseworker has more than one type of case on his/her caseload. For instance, a caseworker with both foster care and family preservation cases is carrying a mixed caseload. Such caseloads do not typically exist in larger offices where there are sufficient numbers of children and families to support specialization. However, in more rural counties, it is often the case that both custody and non-custody (i.e., Michelle H. class members and non-class members) are combined in a single caseload. In such offices, the standard of 15 cases is applied if at least one class member case is assigned to the caseworker. For example, if a caseworker is assigned one child in foster care, one in adoption, and the remainder of the caseload consists of family preservation and assessment cases, the non-custody cases would be counted by family with a maximum of 13 families and two class member children constituting the full caseload of 15 (i.e., the foster care caseload standard).

Per the Council on Accreditation, Family Preservation and Stabilization Services provide support, education, counseling, advocacy, and crisis intervention in the homes and communities of families with children who are: (1) at risk of being placed in out-of-home care, or (2) returning from out-of-home care. Similarly, Child Protective and Preventive Services are offered to families by the South Carolina Department of Social Services which is mandated by law to protect children from abuse or neglect within their families, in foster care, or by persons responsible for the child's welfare as defined by statute. Services are provided to strengthen families so that children can remain safe in the home.

While the child is the primary client when removed from the home, families are the primary clients for other services provided by the agency as well as the focus for investigations. Therefore, the department believes that caseworkers in the county office who carry a mixed caseload should be measured against the standard by summing the total number of foster care children (class members) that they serve with the total number of families (cases) of non-class members that they also serve. Examples include the following:

1. If a caseworker has 15 foster care children on her caseload, she would be an example of a pure caseload worker and is considered in compliance to the standard.
2. If a caseworker has 14 foster care children and 1 Family Preservation case/family on his caseload, she would be an example of a mixed caseload worker and is considered in compliance to the standard.
3. If a caseworker has 14 foster care children, 1 Family Preservation case, and 1 CPS Assessment, she would be an example of a mixed caseload worker who is out of compliance.

Cases/families from the following service lines for county offices would be counted:

1. Child Protection Assessment
2. Family Preservation
3. Other Child Welfare Services
4. ICPC Receiving
5. Support Services only – Families

Efforts are being made, to the extent possible, to eliminate assignment of adult protection cases to child welfare staff carrying at least one class member on their caseload by concentrating their assignment in single caseloads both within and across adjacent counties. DSS commits, in large and medium counties, to refrain from this assignment and to transfer any after-hours APS assessments these staff receive to an APS caseworker within five days of receipt. However, where adult cases continue to be assigned in smaller counties, each adult client will represent a case.

While caseworkers in the county office who carry a mixed caseload will be measured against the standard by summing the total number of foster care children (class members) that they serve with the total number of families (cases) of non-class members that they also serve; supervisors will know the total number of children assigned through weekly caseload reports and ensure that the total number of children represent manageable workloads.

Application of Standards in Specialized Caseloads

Adoption workers will be identified through their regional offices. The appropriate standard for adoption workers will be applied whether the worker case manages only class members or a mix of class-members and non-class members. Because Adoption workers handle few non-class members², children who are class members and other children who are non-class members will be summed and compared to the standard.

If IFCCS is eliminated as a separate workload category as mentioned above, children with that designation will be served in pure or mixed caseloads at the county level with the standard of 15 children. Although IFCCS children typically require special behavioral and/or medical support, those needs may or may not indicate a requirement of increased caseworker contact based on the involvement of other service providers, the child's adjustment in his or her placement, and the capacity of the caregiver to manage the child's needs. Likewise, class member children without specific behavioral or medical diagnoses may require more frequent contact based on their individual needs, permanency status, and placement. Policy currently provides that once a

² Non-class members assigned to adoption caseworkers are primarily children ages 18 and over.

month visits constitute the minimum contact for all foster care and IFCCS children but directs that more frequent visits are to be made based on the child's needs. The DSS practice model currently under development will emphasize the need to individualize case planning and services for each child.

OHAN workers carry investigations involving reports of maltreatment of children in out of home care. They are assigned and located regionally, with Region 2 personnel assigned and located in the central office and the service type is child protective assessment cases (not children). During normal business hours, the Intake Clerk enters the intake in CAPSS, opens the Assessment line and assigns the caseworker. The Supervisor on call will enter the intake in CAPSS, open the Assessment line and assign the caseworker for those cases initiated on the weekend. All cases will be assigned in CAPSS within 24 hours of report to the hotline. Intakes that have not been assigned are captured on a CAPSS report, and email alerts are sent to the worker, supervisor and other leadership staff when assignment has not been made within 48 hours. If assignment was not made prior to receipt of the alert, the line is opened, and an investigator is assigned in CAPSS that day. The OHAN Director follows up on all alerts to ensure they are resolved.

Supervisors who carry a caseload are identified along with the number of cases assigned to each. All cases assigned to supervisors are included in the calculation of caseworker positions required to achieve the workload standards.

Importantly, DSS recognizes that counting in-home cases as families, rather than children, represents a practice change. To promote sustained practice change, DSS commits to providing training on the new standard that aligns with the family-centered model of practice the department is developing. DSS will provide this training by June 30, 2019 and in conjunction with the case practice model implementation. Policy will also be updated as needed. This approach to measuring in-home caseloads is consistent with caseload standards recommended by the Child Welfare League of America (CWLA) and by other authoritative sources such as the Children's Research Center (CRC) of the National Council on Crime and Delinquency. Although children served in the non-custody programs are not, for the most part, Michelle H. class members, DSS believes that establishing workload standards that closely approximate those of CWLA and CRC will play an important role in ensuring the safety of children referred to the agency and in achieving a healthier and more stable over all workforce.

New Caseworker Training Caseload Standard

To provide new workers with time for on-the-job training and skill development, a new caseworker will be assigned a maximum of one-half of the applicable standard for his/her first 6 months after completion of Child Welfare Basic and by policy, efforts will be made to assign no

more than three cases in any thirty-day period³ unless they represent cases of larger sibling groups in foster care or adoption. In the case of sibling groups, all children and their family case(s), regardless of number, should normally be assigned to the same caseworker. If for reasons related to workload, placement or other factors having to do with the interests of the child(ren) and/or family, siblings are not all carried in the same caseload, assignment should be limited to two caseworkers who shall communicate at least monthly to coordinate services. All children in a single placement, regardless of number, will always be assigned to the same caseworker unless this is deemed by the supervisor to be inadvisable for some extraordinary reason having to do with the interests of a child or children.

Based on the current pure standards outlined above, applicable standards for a new worker are the following: new OHAN caseworker, 1:4; new foster care caseworker, 1:8; new IFCCS caseworker, 1:5; and new adoption caseworker, 1:8. After that, the worker can assume a full caseload. This standard is subject to waiver by the Director of Child Welfare Operations for individuals with a year or more of child welfare agency casework experience occurring within the last five years. The Director of Child Welfare Operations may approve that the Training Standard does not apply to a particular caseworker based on documented recommendations from county and regional leadership that outline the caseworker's relevant experience, prior training, level of success in completing Child Welfare Basic (i.e. receiving a final score a certain percentage higher than the minimum required for certification), and observed practice during the 30 days after Child Welfare Basic.

IV. Monitoring and Continuous Quality Improvement

Monitoring of Caseworker Caseloads

For weekly tracking and monitoring to the field, SCDSS has already adapted the current caseload report to include only workers and supervisors with assignment of at least 1 class member, count class member children and non-class member families for county offices (for IFCCS and Adoption regional offices, total children are counted). Currently there are weekly reports for county office caseloads (class members and non-class members), foster care caseworkers (class members only), adoption, IFCCS, and OHAN. These reports will be further adapted so that for each caseworker, his or her total caseload will be compared to the appropriate standard. This report will be issued weekly to the field, including individual caseworkers, and to county and regional leadership. Summary information on the number and percentage of caseworkers in compliance

³ This practice will be incorporated into policy and measured for CQI purposes but will not be measured for FSA compliance as it is not a part of the agreed upon and approved new worker standard.

will be calculated by office, region, and for the state. Caseworkers whose caseloads are not in compliance will be flagged.

Supervisors who are carrying a caseload will be identified and listed in a separate report. As noted below, DSS will create a separate methodology for supervisors who also carry caseloads. Once that methodology is approved and implemented, supervisors carrying cases will then be removed from the caseworker caseload calculation.

The data report will also indicate the number and percentage of caseworkers and supervisors, by worker type, with caseloads that are 125% or more of the limits indicated above.

County leadership will be required to certify back⁴ to the state office monthly that the caseload for each worker is correct. Any changes to that caseload will be updated into CAPSS within three business days to improve the accuracy of the information.

Compliance Monitoring for Caseworkers' Caseloads

SCDSS will pull data from 1 randomly selected day each month to measure compliance for that month. Similar to the report described above, for that 1 random day, all caseworkers and their compliance will be listed with a state level summation by worker type. The data report will also indicate the number and percentage of caseworkers, by worker type, with caseloads that are 125% or more of the limits indicated above. Supervisors carrying cases will also be included in this report.

Monitoring for Supervisors and Continuous Quality Improvement

Similar to caseworkers, supervisors may have “mixed” caseworkers. A supervisor may supervise workers who carry non-class members as well as workers who carry class members. This occurs more frequently in smaller counties where there are fewer workers and supervisors overall.

If a supervisor is assigned at least one caseworker who carries at least one class member, then that supervisor will be measured against the appropriate supervisor standards. For Monitoring Period 5 (October 2018 through March 2019), DSS will work to identify and not include in monitoring calculations those personnel under the supervisor who are not case-carrying personnel, such as human services assistants and/or administrative specialists. Human Services

⁴ This process will include a review of caseload reports by county and regional leadership at the end of each month; an email to their Regional Director by the fifth working day of the following month verifying the report is correct or identifying discrepancies and any actions taken to resolved discrepancies; and an email from the Regional Directors to State Office by the 10th working day of the month with all information from their region.

Assistants typically assist with transporting children, monitoring visits with parents and siblings as appropriate, and other support-related duties. Administrative Specialists perform various clerical duties as determined by each county or regional office. They are most often assigned to higher level staff such as program coordinators. These positions will not be counted in the standard but all staff with case-carrying responsibility will be. The data report will also indicate the number and percentage of caseworkers, by worker type, with supervisory caseloads that are 125% or more of the limits indicated above. Assignment of a supervisor is required as part of new hire documentation. This assures that all caseworkers are assigned to a supervisor as part of the on-boarding process. There are also computer data checks inside the programs that run the monitoring reports.

OHAN supervisors supervise both investigators and intake workers (they do not specialize). Therefore, the standard 1 supervisor to 6 workers will be applied to all OHAN supervisors.

Two reports will be created and issued to the field for tracking and monitoring. The first report will list out by region and office, all caseworkers and their listed supervisors. Using this report, regional and county staff will know which caseworkers are included in the measurement for a specific supervisor. The second report will be summarized at the supervisor level and count the total number of caseworkers that he/she supervises where the supervisor has at least one caseworker who carries at least one class member. The standards will be applied and supervisors who are not in compliance will be flagged. County leadership will again be asked to certify the data and return the certification to the state office monthly. County and regional directors are charged with responsibility for reviewing and correcting each of these reports.

Summary information on the number and percentage of supervisors (by supervisor type) in compliance will be calculated by office, region, and for the state.

Compliance Monitoring for Supervisors

DSS recognizes that there are supervisors who for various reasons may carry caseloads. The most typical reason for a supervisor to carry a caseload is when they have had turnover in their unit and are unable to distribute the cases amongst the remaining staff. Until a new worker is hired and has been trained or the caseloads can be distributed amongst other staff, that supervisor may have a caseload in their name as well as supervise staff. Through input from an outside data expert and from the co-monitors, DSS will create a separate methodology for supervisor workload compliance that considers supervisors carrying cases. DSS may consider in this new methodology creating a combined formula that establishes workload ceilings similar to the formula discussed for senior workers who mentor staff. Supervisors carrying cases will then be

removed from the caseworker caseload calculation. DSS timeline for development of this separate methodology includes the following:

Step 1 – DSS will propose an operational methodology, to include numerator, denominator, any exclusions and the combined formula that establishes workload ceilings if applicable. This will be complete by no later than July 31, 2019.

Step 2 – DSS will work with the Co-Monitors to obtain approval of the methodology. This will be complete by August 30, 2019.

Step 3 – DSS will test this data and be prepared to report to the Co-Monitors for MP6.

Similar to “**Compliance monitoring for caseworkers**”, SCDSS will pull 1 random day in the month, to measure compliance for that month; for that 1 random day, all supervisors and their compliance will be listed with a state level summation. Two methodologies will be utilized. Until the methodology is approved and implemented to measure supervisors who carry cases, all calculations will be measured by workers that the supervisor “supervises” where the supervisor has at least one worker who has at least one class member child in their unit. Once the methodology for supervisors carrying cases is approved and implemented, DSS will utilize that methodology and the methodology for non-carrying case supervisors. As noted under the section above, for Monitoring Period 5 (October 2018 through March 2019), DSS will work to identify and not include in monitoring calculations those personnel under the supervisor who are not case-carrying personnel, such as human services assistants and/or administrative specialists. The data report will also indicate the number and percentage of supervisors, by worker type, with caseloads that are 125% or more of the limits indicated above.

V. Current Status of Data Related to these Targets

DSS has a weekly caseload report that will serve as the foundation for the Michelle H. caseload reports. This caseload report shows all caseworkers who had at least one human services case and contains the following fields: Date the services were provided, Region, Office Number, Office Name, Worker ID (6-character code), Date of First Assignment, Supervisor Indicator (true/false), and Service Type. Using Service Type in combination with Office Name, the following activities can be distinguished: Count of Foster Care Children Served on Date, Count of IFCCS Children Served on Date, Count of Adoption Children Served on Date, Count of Family Preservation Cases and Children Served on Date, Count of Child Protective Assessment Cases and Children Served on Date (Non-OHAN), Count of OHAN Cases Served on Date, and Count of Other Child Welfare Cases and Children Served on Date. While the report is populated weekly by staff from Research, Data, and Accountability, the data are from a “mirrored” image of the production SQL-Server CAPSS “live” database which is populated daily.

While DSS has this well-established report, which has been used to help the agency determine caseworkers with high caseloads, DSS had to address several limitations to measure compliance with Michelle H. targets:

- 1) SCDSS has had a long-standing field in CAPSS to indicate supervisors, but that field has not been consistently maintained. SCDSS IT staff coordinated with the field and program to update the supervisor information by assuring that the supervisor is currently assigned to the correct office and attributing the correct workers to that supervisory unit in early 2018. The requirement of county certification and the efforts of SCDSS IT staff will continue to keep this information updated. SCDSS IT staff has also created a DSS Worker Profile Directory site on SCDSS's intranet which captures information on each worker and their supervisor. While this data is user generated, workers must certify that the information is correct and this request for certification is on a routine monthly schedule. A report from this information is currently generated as a separate extract monthly.
- 2) To accurately measure compliance with the new caseworker standard, DSS has coordinated with the University of South Carolina which maintains a Learning Management System on the completion of basic training (with a date of completion) and the final certification by DSS for new Workers. Those monthly data extracts are linked to the caseload report to flag new workers. USC has established a monthly reporting process to DSS for that information. County and Regional Directors are charged with responsibility for reviewing caseload reports, which designate new caseworkers, and assuring that assignment is within the guidelines calling for no more than three new cases per month and lower overall caseload limits for the first six months post training.
- 3) To accurately measure compliance with the IFCCS standards, should DSS maintain that workload category, DSS will need to develop a better way to identify IFCCS children in CAPSS. Currently, IFCCS children are identified by the office of the caseworker who manages them. If siblings are also managed by an IFCCS worker, it is assumed on the caseload report that they are also IFCCS children. DSS will need to create a clear designation for IFCCS children.

VI. Baselines and Interim Enforceable Targets

Baseline for Targets:

The baseline performance⁵ on the two non-supervisory workload measures is:

1. **A.2.b: 23%** of Workers during the period had a workload within the applicable Workload Limit (Target 90%).
2. **A.2.c: 64%** of Workers during the period had more than 125% of the applicable Workload Limit (Target 0%).

The baseline performance⁶ on the two supervisory workload measures is:

1. **A.2.b: 45%** of Supervisors during the period had a workload within the applicable Workload Limit (Target 90%).
2. **A.2.c: 31%** of Supervisors during the period who had more than 125% of the applicable Workload Limit (Target 0%).

Interim Benchmarks and Timeline

The projected interim performance on the two non-supervisory workload measures is:

A.2.b: Target 90%		A.2.c: Target 0%	
Interim Benchmark:	Timeline:	Interim Benchmark:	Timeline:
40%	September 2019	40%	September 2019
65%	March 2020	25%	March 2020
80%	September 2020	15%	September 2020
90%	March 2021	0%	March 2021

Utilizing the approved Workload Limits, every Worker who has at least one class member on their caseload during the reporting period will be assessed for compliance monthly.

⁵ The baseline methodology now counts children (for Adoptions and IFCCS or) or children/families (for mixed caseloads for county offices only), or investigations (for OHAN) dependent on the Office. (The methodology no longer uses hours based on the workload study). Data is from the weekly caseload report dated September 25, 2017, results of monitoring period 2.

⁶ The supervisory workload baselines in this revised implementation plan are based on data from the weekly caseload report dated March 2, 2018 and supervisor report dated March 5, 2018. These data are inclusive of human services assistants and administrative staff, and, therefore, may be improved once data are refined.

The interim enforceable targets were initially based on 1/1/2017 to 1/31/2017 daily caseload reports counting children and families but reevaluated from the results for the Monitoring Period ending on March 2018 (MP3) and caseload reports ending in September 2018. When these projections were initially built, only about half of the counties in the state had been “rolled into” a regional intake hub for CPS investigations. During this first roll-in phase, the system experienced a spike in caseloads, and although the cases eventually leveled off, there was an overall sustained increase in caseloads. In its 2018 budget request, the Department received resources to move the remaining counties into the intake hubs. Similar to the initial roll into the hubs, SCDSS again experienced a spike in caseloads which negatively impacted its performance during the third monitoring period (MP), from October 2017 to March 2018. It should also be noted that SCDSS experiences seasonality increases typically around February / March of each year.

While SCDSS has a final target of no Worker or Worker’s supervisor shall have more than 125% of the applicable Workload Limit (A.2.c) and has estimated interim enforceable targets, the department recognizes that it is imperative to ensure that workers do not have dangerously high caseloads for the safety of the children in its care. Therefore, using recent caseload reports and projected allocations of new workers, the department has estimated an additional interim target for no worker shall have more than 180%* of the applicable workload limit by September 2019. *In county foster care caseloads for example, 180% of a pure caseload represents 27 children. Furthermore, an additional interim target for no worker shall have more than 170% of the applicable workload limit by March 2020 was included. Applicable caseloads would also be applied to adoption and IFCC caseworkers and OHAN Investigators.

Target 0% No worker above 180%		Target 0% No worker above 170%		Target 0% No worker above 160%	
Interim Benchmark:	Timeline:	Interim Benchmark:	Timeline:	Interim Benchmark:	Timeline:
0%	September 2019	N/A	September 2019	N/A	September 2019
0%	March 2020	0%	March 2020	N/A	March 2020
0%	September 2020	0%	September 2020	0%	September 2020
0%	March 2021	0%	March 2021	0%	March 2021

The projected interim performance on the two supervisory workload measures is as follows:

A.2.b: Target 90%		A.2.c: Target 0%	
Interim Benchmark:	Timeline:	Interim Benchmark:	Timeline:
72%	September 2019	20%	September 2019
80%	March 2020	10%	March 2020
90%	September 2020	0%	September 2020

Utilizing the approved Workload Limits, every Supervisor who is supervising a caseworker with at least one class member on their caseload during the reporting period will be assessed for compliance monthly. These interim enforceable targets were initially based on 3/5/2018 caseload and supervisor reports but were reevaluated from the results for the Monitoring Period ending on March 2018 (MP3).

OHAN

DSS will make offers of employment for the nine new OHAN investigative positions to begin by March 17, 2019. The staff that accept an offer of employment and who have completed child welfare basic will be trained utilizing the new OHAN Investigation Training curriculum and accepting cases no later than April 30, 2019. The staff that accept an offer of employment and who have not completed child welfare basic will complete child welfare basic, will be trained utilizing the new OHAN Investigation Training and will be accepting cases no later than July 15, 2019. By September 30, 2019, DSS will determine how many additional staff are needed to bring OHAN staff to the required caseload standards and begin the process for allocation of additional positions.

VII. Strategies to Support Workforce Development

1. Agency Infrastructure Improvements:

a. Reorganize Leadership of the Child Welfare Division

Extensive work has occurred to reorganize the Child Welfare Division to provide more support for the child welfare reform efforts. When the Michelle H. work began, the Deputy Director of Child Welfare had only two direct reports, the Director of Field Operations and the Director of Programs, Policy, and Practice. The Department recognized in this structure that it would be difficult to plan and drive the reform efforts while also tending to the day-to-day operations of the Child Welfare Division. The Child Welfare Division has begun to reorganize by creating the following offices with each of its directors reporting directly to the Deputy Director of Child Welfare – Safety Management, Permanency Management, Child Health and Well-Being,

Performance Management and Accountability, Family and Community Partnerships, and Regional and County Operations. The Child Welfare Services Department will utilize a planning and implementation teaming structure to support reform efforts. A new Safety Management director has been appointed, and the department recently hired the Child Health and Well-Being director, the Permanency director, and the director of Performance Management and Accountability. The agency is currently in the process of hiring directors of Family and Community Partnerships and Regional and County operations.

b. Support for an IT System that can Produce Accurate and Timely Data Reports

SCDSS understands that in order to provide its case managers, management, and other stakeholders with real-time, accurate data about the children and families they serve, it will be necessary to implement several improvements to the Child Adult Protective Services System (CAPSS) and intends to make the budget requests as outlined in the five-year budget plan to support this commitment.

2. Establishing Workforce Capacity:

a. Hiring and Retention of Caseworkers and Supervisors

To achieve caseload compliance, the Department projected the need for 670 additional caseworkers. The Department requested 163 positions for FY 2017-2018, 182 positions for FY 2018-2019, and funding for 121 positions in FY 2019-2020. The Department will request the additional caseworkers over the next two budget years. These projections were made prior to the Agency exploring changes to IFCCS and Adoptions as presented in this plan. Updated projections will be made by June 30, 2019 and as the plan is implemented. Positions for FY 2018-2019 were allocated throughout the state based on identified need using a methodology through the Accountability, Data, and Research unit. That methodology included an evaluation of current caseload reports, current vacancies, and current enrollment in Child Welfare Basic. From that evaluation plus an evaluation of growth trends, projected need was based on total workload (children and APS). The FY2018-2019 FTEs were allocated according to this projected need and evaluated through several work sessions with the Operations Director and Regional Managers. They are being rolled out incrementally.

VIII. Strategies to Achieve Caseload Standards:

Currently, DSS is struggling with very high caseloads in some counties. The agency has been allocated additional caseworker positions but is unable to fill them as it continues to lose newly hired and even longer-term personnel at a rate exceeding its overall ability to hire and prepare new caseworkers. Turnover in case manager, supervisor, and program coordinator positions in calendar year 2017 was 31.85 percent. For the first quarter of 2018, it was 11 percent compared with 9 percent for quarter one in 2017 and 7 percent in 2016. Several factors have been linked to this unfortunate reality. They include salaries that are roughly 30% below the South Carolina median wage or the living wage for one parent with one child; a lack of opportunity for career advancement within DSS and particularly in front line service delivery; supervisors that are carrying such high workloads that, in many instances, they cannot provide consistent oversight and support for their staff; the high caseloads themselves; and other factors such as inadequate ongoing training, lack of role clarity, and lack of supports such as paraprofessional personnel and supportive technology.

To meet the requirements of caseload standards, DSS must address the needs of its workforce as aggressively as possible using the resources currently available and those which will be requested in the future. The additional resources are accounted for in the five-year comprehensive budget plan submitted to the court in May 2018. This plan will be reviewed and updated at a minimum of annually by December 31st or sooner and more frequently as implementation costs are determined. The following actions represent immediate steps that DSS will take to begin to address its workforce deficiencies while also working with the Governor and other executive branch agencies and with the legislature to obtain support for needs that exceed its current resources.

A. Short Term Strategies (January 2019 through January 2020)

DSS will initiate the following actions within the current state fiscal year and complete them by the end of January 2020 unless otherwise specified below.

1. More fully use caseworkers assigned to the custody programs by eliminating the current practice of assigning two caseworkers, one in the foster care program and one in adoptions, to children who are legally free for adoption. Adjustment of these assignments is already underway and expected to be completed within the timeframes listed below.

South Carolina law currently provides for the provision of designated adoption services, which is understood as requiring specialized caseload assignment of children with an adoption plan. DSS intends to explore further interpretation of this requirement. Meanwhile, however, the agency does have the authority to eliminate the practice of requiring the cases of children moving toward

adoption to be carried by both foster care and adoptions caseworkers. This transition will be carried out in phases as outlined below:

- Phase 1: Cases of all children with a permanency plan of adoption who are free for adoption and are placed with a family that intends to adopt and has signed an adoption agreement or a pre-adoption agreement will be assigned solely to an adoption worker. (Currently implementing)
- Phase 2: Cases of children with a permanency plan of adoption who are free for adoption, and who are siblings of children case managed by Adoptions pursuant to Phase 1 but are not placed with a family that intends to adopt will be assigned solely to an adoption worker. (Currently implementing)
- Phase 3: Cases of children case managed by county DSS foster care case managers who have a permanency plan of adoption and are free for adoption, but do not have an identified adoptive resource will be assigned solely to an adoption worker. (Begin implementation by July 2019)
- Phase 4: Cases of children case managed by IFCCS service coordinators who have a permanency plan of adoption and are free for adoption, and who are siblings of children case managed by Adoptions pursuant to Phase 3, but do not have an identified adoptive resource will be assigned solely to an adoption worker. (Begin implementation by September 2019)
- Phase 5: Cases of all other children who have a permanency plan of adoption, are free for adoption and case managed by IFCCS service coordinators, but do not have an identified adoptive resource will be assigned solely to an adoption worker. (Begin implementation by November 2019)

This measure more fully uses the capacity of the adoption caseworker position and, in the current workload environment, this is critically important. Efforts will be made to minimize the effects of caseworker change for children and families by requiring that foster care and adoption caseworkers make a transition visit together to each child in instances when the adoption caseworker does not have an established relationship with the child and family.

2. Implement “Stay” interviews conducted by managers for staff at regular intervals (e.g., 60, 90, 180, 260 days) through their first year of work and develop and implement a process for follow up on needs expressed by interviewees. Examples of questions to be included in interviews are:

- Are you getting the tools and training that you need?
- Do you have a good relationship with your peers?
- What is the fit with your supervisor?
- What is the cultural fit with the agency?

A formal process to record and aggregate results of “Stay” interviews is being developed and will be implemented *by June 30, 2019*. The process also includes county office Directors’ documentation of individual follow-up with interviewed caseworkers to address more

immediate non-systemic needs. For example, local offices will be expected to meet requests for tools and training within the limits of their resources and to communicate those which cannot be fulfilled to the regional level. This is also true for accommodations relating to in-office relationships and supervisory issues that threaten caseworker development and/or retention.

3. Increase salaries for staff having BSW or MSW degrees and revise caseworker and supervisor job descriptions to indicate a clear preference for social work degrees as per the attached salary plan.

4. Engage South Carolina public university departments of social work in developing a partnership using provisions for federal funding available under Title IV-E of the Social Security Act. This partnership will be directed toward recruitment of BSW students who, in return for tuition support and DSS-based internship opportunities, will commit to at least two years of work for DSS upon graduation. Ideally, this partnership will also be developed to include at least two courses with specific child welfare content that will lead, along with the agency internship, to allowing these students to become qualified as caseworkers without having to go through the pre-service training currently required of all new hires. The focus of student education should be direct practice rather than administrative.

Work on this initiative is beginning immediately as part of DSS's application for a federal workforce development grant from the National Child Welfare Workforce Institute (NCWWI). That application will be submitted by the end of January 2019. If successful, it will provide funding and technical assistance support for the agency-university partnership development over the next five years. If DSS's application is unsuccessful, the agency remains committed to engaging universities as outlined below.

Specific steps in this process include:

- a. Within 90 days of plan finalization, hire a Child Welfare Workforce Developer. Once this person is in place, he/she will be responsible for implementing items b – d below *by June 30, 2019*
- b. Contact the Georgia Department of Family and Children's Services agency-university consortium, and possibly with those in other states (e.g., Louisiana, New Jersey, Pennsylvania, etc.) known to have long standing, successful agency-university partnerships, to obtain information about design and other key considerations in establishing and supporting agency-university agreements;
- c. Conduct outreach to South Carolina universities to ascertain interest and establish a planning group; and

d. Consult with Public Consulting Group, the Region 4 office of the federal Administration for Children, Youth, and Families, and/or other technical assistance resource(s) to explore opportunities for accessing IV-E funding to support a university partnership or multi-university consortium.

The agency-university partnership should also include provisions for supporting DSS child welfare employees to obtain the Master of Social Work degree. Overall, retention studies have shown that those obtaining the MSW when already employed in child welfare are more likely to remain than those who have the degree at the time of hire.

5. Advance the proposal already initiated to provide repayment of student loans for staff employed for at least one year who have degrees in social work and, possibly, in very closely related fields. Work to assess the cost of this strategy will be completed during the current fiscal year to allow for this to be included in the agency's budget request for 2020-21 which will be made in September 2019. Once approved, payment can be made retroactively to staff who qualify.

6. Create a realistic job preview video or a virtual reality demonstration or, alternatively, enter into an agreement with an existing jurisdiction to adapt an existing one, for posting on the state human resources website with required viewing by those wishing to submit an online application for a child welfare caseworker position. Research has already begun and the target date for implementation is August 2019.

7. With the Office of Human Resources, review current procedures for approving requests for authorizations of salary above the minimum and for salary increases within pay band and make any changes needed to ensure that they are based upon clear, objective, and consistently applied criteria. Communicate the procedures and criteria in writing to all staff by June 30, 2019.

B. Intermediate Strategies (July 2019 – July 2020)

DSS will initiate the following actions in July 2019 and complete them by the end of July 2020 unless otherwise specified below.

8. DSS will seek funding in September 2019 to raise the salaries of all child welfare frontline staff (i.e., caseworkers and supervisors) consistent with the salary plan attached as Appendix A. Where such raises for caseworkers and supervisors result in caseworkers being paid more or within 10% less than child welfare supervisors or managers to whom they report, budget shall also be requested to raise salaries of those positions to the next highest step consistent with the salary plan attached as Appendix A so that salaries are higher than those in the highest subordinate position level.

9. DSS will design, and request both budget and administrative authorization to implement, a career path for child welfare caseworkers that consists of a trainee entry level position and provides two to three levels beyond trainee with increasing qualifications related to education, experience, and skill demonstration and ascending pay grades, preferably with opportunities for pay advancement to a maximum salary within each grade. This new set of positions is viewed as necessary (a) to maintain personnel in providing direct services to families and children as they grow in work related knowledge and skill and (b) to reduce turnover by affording employees opportunities for career advancement. That new salary structure and career path, as prepared by DSS, the Public Consulting Group (PCG) and Sue Steib, a workforce development consultant is included as a separate attachment (Appendix A).

10. Identify counties with caseloads consistently over 125% of standard, allocate additional positions to achieve under 125% of standard across programs (taking into consideration current vacancies), and deem positions approved to fill. This will require undertaking a process to validate the size of caseloads with at least one class member, particularly those in the non-custody programs, to ensure that counts represent only those that need to be open. To make this determination, DSS will need to establish criteria and direction for review of caseloads to include processes and protocols that include supervisory oversight and QA. In child protection assessments, for example, agency policy calls for a determination to be made within 45 days of a report with the possibility of one 15-day exception. Thus, any case open longer than 60 days, should be screened for closure, if no safety concerns exist and all necessary information has been collected to make a determination on the allegations. In Family Preservation, cases open longer than three months may call for updated safety assessments and plans for disposition and closure within 60 days unless there are clear reasons related to child safety and risk for maintaining a case for a specified length of time.

11. Implement measures to support selection of staff more likely to remain in child welfare by taking the following actions by January 2020:

a. Design or adopt a research-informed protocol for selection of applicants (e.g., the *Staying Power* toolkit developed in North Carolina) that includes assessment of competencies, standardized interviewing procedures, and exercises such as use of questions and writing of reports based on typical child welfare case scenarios.

b. Train personnel involved in hiring in the new selection process.

12. Determine a ratio of allocation of support staff positions to foster care caseloads using current data on workload, miles traveled by caseworkers, and number of children placed farther than 30 miles away. Based on ratio, determine the number of new support positions needed statewide and by county. In addition, determine a base number of support positions for each county to

meet transportation needs as placement implementation plan efforts reduce the number of children placed out of county. The agency currently has 62 support positions statewide. Consider position need by county as a basis for adjusting current assignments and requesting budget in September 2019 for additional allocations in FY '20-21. Such positions can be used for routine agency-required transportation of parents of children in out of home care and for children themselves in selected situations which do not involve transporting children to appointments or events that are likely to be emotionally charged or to require that the child be accompanied by someone with direct knowledge of or responsibility for the child's day to day functioning and well-being (e.g., medical or psychotherapy appointments). The goal of using these positions for support services would be to relieve foster care caseworkers of some of their transportation responsibilities and to eliminate the use of contracted transportation services for children in favor of selectively using trained support personnel with consistency in their individual assignment to specific children in the situations described above. Such personnel might also be assigned other administrative duties otherwise handled by caseworkers such as handling payment related questions from providers or resource families and scheduling of appointments.

13. Design and implement measures to support high quality supervision as the cornerstone of workforce stability and performance. This will include:

a. Working with USC to develop an overview of pre-service training content that all supervisors who entered the agency prior to 2019 must complete as part of their annual in-service training requirement. (July 2020)

b. Ensure that supervisors are the initial recipients of training in new knowledge and skills. DSS will utilize the Learning Management System to incorporate new training content into the supervisor training track. Training tracks are currently under development with assistance from our Chapin Hall partners and will be completed in conjunction with the case practice model. (March 2020)

c. Acknowledge the unique positions of supervisors at the midpoint of the organization (i.e., "touching" both front line staff and management) by creating a structure for them to regularly provide input and feedback to leadership regarding program policy, workforce development, internal and external messaging, and any other barriers to the attainment of positive outcomes for families. (January 2020)

d. Create policy that prioritizes supervisors in all professional development opportunities such as stipends to obtain MSWs, additional training/certification in specialty areas, and incentivize through higher pay grades, formal acknowledgment of expertise, appointment to special committees and task forces, etc. (January 2020)

14. Redefine the current “performance coach” position to include specific qualifications related to advanced knowledge, experience, and practice skills and standardize their role in providing clinical and case consultation to front line staff. Once the performance coach role is standardized and coaches are functioning as intended, the number and allocation of these positions will be reexamined. (July 2020)

15. Develop a performance appraisal process for child welfare staff at all levels that reflects the values and principles of the child welfare practice model and includes identification of needs for additional learning and skill development. The evaluation process will be developed in conjunction with DSS’ university training partners and incorporate objective measures of staff performance and accomplishment as a basis for gauging additional learning needs and determining advancement in merit pay. (July 2020)

C. Longer Term Strategies (July 2020 – 2023)

The actions outlined below reflect additional measures necessary to fulfill recommendations of the recent workforce assessment. They are viewed as no less important than those in A. and B. above, but, because they involve considerable overlap with the practice model and training plan development now underway, they are expected to require additional time and sequencing.

16. Establish a mentoring program that pairs senior caseworkers with new caseworkers. Develop policies and procedures for program implementation as well as a process for monitoring and CQI. Provide training to supervisors and senior caseworkers.

17. Support mentoring by senior caseworkers in the new caseworker career progression by creating a combined formula that establishes workload ceilings for instances in which a caseworker is assigned to mentor specific staff. For example, a foster care caseworker mentoring one trainee would be considered to have 20% of his/her workload devoted to mentoring and would thus carry no more than 12 foster care cases.⁷

18. If by the end of SFY 2020 the short term and intermediate steps outlined above have not reduced turnover sufficiently to achieve equitable and reasonable workload and minimize vacancies such that they are rare and of very short (e.g., one month or less duration), DSS will create an “over-hire” pool. This would involve requesting authorization for the onboarding of a number of casework staff over and above actual vacancies who are already trained and available to fill vacancies as they occur. Trained and certified caseworkers from the “over hire pool” can be deployed to shadow a resigning or promoting caseworker as he or she transitions casework responsibility as well as to assume duties for those on extended leave, such as for maternity or family medical needs. DSS will consider asking retired supervisors to be available to fill

⁷ This practice will be included in policy and measured for CQI purposes, but not measured for FSA compliance as it is not an agreed upon and approved caseload standard.

supervisory vacancies during the hiring or promotion process or while supervisors are on extended leave.

The three objectives described below are part of the training and workforce development that DSS envisions completing with university schools of social work. The agency is currently applying for a federal workforce development grant in partnership with the University of S. Carolina. If successful, the grant will provide technical assistance and monetary support for workforce development, to include supervision and leadership, during the period 2019 to 2023. If DSS' application is unsuccessful, the agency will continue to work on these objectives with its university partners and include them in its state budget and federal Title IV-E funding requests for that same time period.

19. Establish an objective process for onboarding of supervisors that identifies candidates for supervisory and management preparation and establishes a track for supervisory skills development to begin immediately for newly appointed supervisors and to continue through their first two years in supervision. This process, characterized in some systems as a "Supervisors' Academy" will be compulsory and provide both classroom training that begins immediately upon assumption of a supervisory position and ongoing mentoring by an assigned mentor identified based on demonstrated skills in practice and supervision.

20. Develop a curriculum for ongoing professional learning that consistently incorporates the practice model and produces skill building in key areas of practice such as motivational interviewing, solution-focused approaches, behaviors associated with building client trust and working alliance, factors that underlie maltreating behaviors, behaviorally based case planning, and utilization of evidence-based interventions that is accessed through a framework of individualized planning based on caseworkers' unique learning needs, areas of interest, and performance evaluation. When it is fully developed, it is envisioned to include advanced curricula leading to specialized certification in areas germane to child welfare practice such as assessment and intervention in domestic violence, in families experiencing parental substance abuse, with developmentally disabled parents, and in child sexual abuse.

21. Establish a leadership academy for managers or use the state Office of Human Resources leadership development training opportunities that provide both a standard track and electives for professional development. Curricula and course content should ensure an understanding of:

- fundamentals of management in complex organizations;
- importance of a positive, outcome-oriented organizational culture that promotes transparency and learning;
- practice innovations, and their associated evidence; and
- key factors in the assessment and attainment of child safety, permanency, and well-being.

The academy is envisioned as subject to ongoing adjustments, drawing on nationally recognized experts (i.e., researchers and model developers/purveyors) to reflect advancements in knowledge and the emergence of new evidence-based and research-informed models and approaches.

IX. Budgeting to Achieve Workload Capacity

All relevant sections of the South Carolina Department of Social Services Five-Year Comprehensive Budget Narrative (Five-Year Budget Plan) will be updated to reflect the estimated fiscal impacts of the activities discussed above determined necessary to accomplish the goals set forth in the Caseload Implementation Plan, including the salary plan attached as Appendix A.