

## Children's Bureau Child and Family Services Reviews Round 4 Guide for Writing “No” Narratives and Rationale Statements

The Onsite Review Instrument and Instructions (OSRI) is the official case review instrument for the onsite review phase of the Child and Family Services Reviews (CFSRs). Many states also use it to inform program improvement planning and monitoring, and for their ongoing Continuous Quality Improvement (CQI) reviews. As an important part of completing this instrument and rating its items and outcomes, reviewers must complete short “No” Narratives and longer Rationale Statements. This guide is recommended for use by reviewers to ensure that “No” Narratives and Rationale Statements succinctly and comprehensively provide the information required to support answers to OSRI questions.

Briefly:

- A **“No” Narrative** is a written response to rating-related OSRI questions within each item that directly contribute to the item’s rating. They are required when the answer to such a question is No (see Figure 1, below) and the written response explains why No was chosen.
- A **Rationale Statement** is a short essay-like response at the end of each item that provides case-specific details explaining and justifying the item’s rating. It highlights strengths or challenges related to specific practices, systemic issues, or resources that affected performance on the item.

The guidance provided in this document concerns “No” Narratives and Rationale Statements in general and does not focus on the specific information required to support each item’s rating.

It may be helpful to have the OSRI on hand to reference while using this guide.

## Section I: Guidance for Writing “No” Narratives

1. **With one exception,<sup>1</sup> any “No” response to rating-related OSRI questions must always be supported with a short narrative explaining that response.** As noted above, these short narratives are only required for “No” responses. Rating-related questions answered with a “Yes” response do not require a narrative.

**Figure 1: Item Question With Narrative Response Field**

A. During the PUR, did the agency make concerted efforts to provide or arrange for services for the family (including any services for alternative caregivers) to protect the children and prevent their entry into foster care or re-entry into foster care after a reunification? (Be sure to assess the entire PUR.)

Yes       No

If No, explain circumstances in the narrative field below:

As Figure 1 shows, the item question (A) is followed by its possible responses—in this case, Yes or No (for some questions, “Not Applicable” is also a response option). Since the “No” response is selected, the next required step is to compose a brief “No” Narrative in the blank text field below the response options.

2. **“No” Narratives typically do not need to exceed one sentence in length.** Ideally, the Narrative will identify what specific evidence or circumstance exists to support the “No” response so that any reader immediately understands why the response is accurate.

### Example 1: Item 2, Question A

*During the PUR, did the agency make concerted efforts to provide or arrange for services for the family (including any services for alternative caregivers) to protect the children and prevent their entry into foster care or re-entry into foster care after a reunification? (Be sure to assess the entire PUR.)*

**Narrative Response (example):** The initial 10/31/2021 Safety Assessment noted a chronic lack of supervision for the young children, and the agency did not provide appropriate services to address this concern.

### Example 2: Item 7, Question B

*If the answer to question A is No, was there a valid reason for the child’s separation from the siblings?*

**Narrative Response (example):** The child was separated from his two siblings because there was no foster home available that could support all three children.

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<sup>1</sup> The one exception in the OSRI is Item 1, Question C, which requires a written response when either Question A or B in that item is answered with anything other than 0 (zero). However, the same instructions for any “No” Narrative apply to this required narrative as well.

### Example 3: Sub-Item 12A, Question A1

*During the PUR, did the agency conduct a formal or informal initial and/or ongoing comprehensive assessment that accurately assessed the children's needs?*

**Narrative Response (example):** The child is pre-school age, lives in an isolated area, and has only limited contact with peers. There is no evidence that she was assessed for socialization needs.

- 3. Further details supporting the “No” response and its relevance to the item’s rating should be included in the Rationale Statement.** Supportive details that provide contextual information for the “No” response but would require lengthy explanation should be included in the item’s Rationale Statement, which is the appropriate place for additional case-specific details that support the overall item rating. See Section II: Guidance for Writing Rationale Statements.

### Example Sub-Item 12B Question B2

*During the PUR, did the agency conduct a formal initial and/or ongoing comprehensive assessment that accurately assessed the father's needs?*

**Narrative Response (example):** The father’s whereabouts were unknown, and the agency made insufficient efforts to locate him to assess his needs.

**Expanding on a “No” Narrative Response in a Rationale Statement (example):** Item 12 is rated as an Area Needing Improvement because the father’s whereabouts were unknown and therefore no assessment occurred. The mother supplied his full name, birth date, and last known address. The last telephone number the mother had for the father was non-functional. However, the agency made insufficient efforts overall to locate the father, such as checking social media, asking other relatives about any information on the father, or conducting a formal absent-parent search.

## Section II: Guidance for Writing Rationale Statements

A Rationale Statement is a short, essay-like narrative that provides case-specific details that address all rating-related questions, or Rating Criteria, within an item so the reader can fully understand how the overall rating for that item was determined. The primary purpose of a Rationale Statement is to explain and justify the item’s rating. For example, if the item is rated as a Strength, its Rationale Statement should specifically explain the case practice that justified that Strength rating. If the item is rated as an Area Needing Improvement, the Rationale Statement should clearly explain what was not done—for example, what services were not provided that should have been. From reading an item’s Rationale Statement, someone who is not familiar with the case should understand how the facts and circumstances support the rating.

Figure 2: Item 2 Rating Criteria, Rating, and Rationale Statement Text Field

*Section I: Safety Outcome 2*

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**Item 2 Rating Criteria:**

This item should be rated as a **Strength** if either of the following applies:

- The answer to question A is Yes, and the answer to question B is Not Applicable.
- The answer to question A is No, and the answer to question B is Yes.

This item should be rated as an **Area Needing Improvement** if either of the following applies:

- The answer to question A is No, and the answer to question B is No.
- The answer to question A is No, and the answer to question B is Not Applicable.

Item 2 should be rated as **Not Applicable** if the response to the question of applicability is No.

**Item 2 Rating (select one):**

Strength     Area Needing Improvement     Not Applicable

Provide comments that highlight strengths or challenges related to specific practices, systemic issues, or resources that affected this item in the narrative field below.

Figure 2 demonstrates the Rating Criteria for Item 2, which indicates it is Questions A and B together that contribute to the item’s overall rating. Based on the responses to those two questions, the item will be rated as either a Strength or an Area Needing Improvement. The blank text field below the rating options is where the Rationale Statement must be entered.

Below are 11 tips for writing effective Rationale Statements. Select examples in these tips use gray highlighting to indicate the focal point of the example.

1. **Tip 1: Rationale Statements should open using the following structure: “Item X is rated X because...”** For example, the Rationale Statement supporting a Strength rating for Item 2 would begin, “Item 2 is rated as a Strength because...,” and would then go on to support that rating, keeping in mind the other guidance provided in this document. This helps structure the Rationale Statement so that information directly supporting the rating appears first and before additional details that might not directly support it.

### Example: Item 1: Timeliness of Initiating Investigations of Reports of Child Maltreatment

#### Instead of—

One report was received during the PUR, and that report was responded to in a timely way. On June 16, 2017, a report was received at 10 a.m. alleging physical abuse...

#### Try this—

Item 1 is rated as a Strength because one report was received during the PUR, and that report was responded to in a timely way. On June 16, 2017, a report was received at 10 a.m. alleging physical abuse...

**Explanation:** By using the required opening, the second example focuses the Rationale Statement so the reader immediately understands what rating is being supported by the rest of it.

2. **Tip 2: There is no required length for Rationale Statements. They should be as succinct as possible while still containing all of the information necessary to fully support and explain the item’s rating. They should also be organized into structured, topical paragraphs that support the main point. Other organizational structures, such as bullet lists or outlines, should not be used.**

**Example: Item 2: Services to Family to Protect Child(ren) in the Home and Prevent Removal or Re-Entry Into Foster Care**

**Instead of—**

Item 2 is rated as a Strength because:

- The agency determined the target child would be unsafe if left in the home and so child was removed and placed in foster care without services being provided.
- Target child had suffered physical abuse and possible sexual abuse (perpetrator unclear) and was afraid of being in home.
- A series of unknown people were coming in and out of home.
- Mother denied any knowledge of possible sexual abuse; her ability to protect the child was doubtful.
- Target child’s siblings were out of the home visiting cousins at the time and remained with cousins.
- The relative environment was determined to be safe, so the siblings were deemed to be in no immediate danger.

**Try this—**

Item 2 is a rated as a Strength because even though the target child was removed from the home and placed into foster care without any services being provided to prevent removal, the agency determined that the target child would be unsafe if left in the home. The child had suffered physical abuse, so a forensic interview was done, which also revealed possible sexual abuse. The identity of the perpetrator of the sexual abuse was unclear, and it was learned that a series of people were coming in and out of the home.

The mother denied any knowledge of possible sexual abuse of the child or that the opportunity existed for it to occur, and her ability to protect the child was doubtful. This resulted in the target child’s emergency removal and placement into foster care. The child’s siblings were out of the home visiting cousins at the time and were left with the cousins for several weeks by the mother. The relative environment was determined to be safe, so the siblings were deemed to be in no immediate danger.

**Explanation:** The first example lacks a clear, narrative structure and as a result is more difficult for the reader to follow. By presenting the same information in paragraph form with a logical flow, the second example presents a clearer story of the case that readers will generally find more approachable and comprehensible.

- Tip 3: A Rationale Statement should include case-specific details sufficient for someone who is completely unfamiliar with the case (for example, staff compiling review results to identify practice trends) to be able to easily understand why the rating is justified.**

#### **Example: Item 18: Mental/Behavioral Health of the Child**

##### **Instead of—**

Item 18 is rated as an Area Needing Improvement because the child's mental health needs were not adequately assessed and he has not been provided targeted services to meet his needs. The target child is not taking any prescription medications.

##### **Try this—**

Item 18 is rated as an Area Needing Improvement because the child's mental health needs were not adequately assessed and he was not provided targeted services to meet his needs. The agency had not completed a mental health assessment of the target child since his entry into care or consulted the child's therapist since counseling began. According to information gathered during interviews, the child displayed no unusual behavioral challenges and has been withdrawn and reluctant to communicate since his placement into care. Further, while he attended individual therapy every other week, where he dealt with the harshness and abuse of his mother, separation from his family, and being bullied in school, he made minimal progress and asked for a therapist who "looks like him." The target child was not taking any prescription medications.

**Explanation:** The first example provides little detail for the reader beyond the basic statement that the child's needs were not adequately assessed or addressed. The additional information in the second example provides case-specific details such as the type and frequency of therapy, information about the child's particular issues, and a note about the child's subdued communication. All of these details help the reader more directly understand the case-specific circumstances that factored into the item's rating.

- Tip 4: Rationale Statements should not simply recite the events of a case. Rather, they should distill and assess the agency practice and explain why that practice demonstrated the criteria for the given rating. It is acceptable and even encouraged for a Rationale Statement to include additional comments that might help explain strengths or challenges related to specific practices, systemic issues, or resources that affected the item's rating.**

#### **Example: Item 16: Educational Needs of the Child**

##### **Instead of—**

Item 16 is an Area Needing Improvement because the agency did not adequately assess and address the child's educational needs. Although an Individualized Education Plan (IEP) was in place, according to interviews, the child did not receive all the services he required. The child was repeating first grade at the end of the PUR, as he was held back the past year. In addition, the target child had difficulty with...

### Try this—

Item 16 is an Area Needing Improvement because the agency did not adequately assess and address the child's educational needs. Although an Individualized Education Plan was in place, according to interviews, the school did not consider that English was the child's second language and the effect this had on the child's learning, and the agency did not advocate for related ways to support the child. The child was repeating first grade at the end of the PUR, as he was held back the past year. In addition, the target child had difficulty with...

**Explanation:** The addition of the highlighted text in the second example, noting the language barrier as well as the agency's lack of advocacy, clarifies how the agency's inaction directly contributed to the challenges experienced by the target child. This enables the reader to more clearly understand the central issues that led to the rating's determination.

5. **Tip 5: A good Rationale Statement will address all rating-related elements of an item, including the areas of focus in the item's Purpose of Assessment and every question specifically identified in the OSRI as contributing to the item's rating.**

### Example: Item 5: Permanency Goal for Child

#### Instead of—

Item 5 is a Strength because the current goal of reunification is appropriate and was established in a timely way. The sole permanency goal of reunification was established at a Family Team Meeting on the child's 10th day in care. The child's permanency goal is clearly documented in the case plan and court documents. The child has not been in care 15 of 22 months, so timeliness of filing for termination of parental rights (TPR) does not apply.

### Try this—

Item 5 is rated as a Strength because the current permanency goal of reunification is appropriate and was established in a timely way. A sole permanency goal of reunification was set at a Family Team Meeting at the child's 10th day in care. This is an appropriate goal because the mother expressed her desire to have the child back in the home, was willing to work toward that end, and has a strong bond with her child. The child's permanency goal is clearly documented in the case plan and court documents. The child has not been in care 15 of 22 months, so timeliness of filing for TPR does not apply, and no exceptions apply to this case.

**Explanation:** While the second example does address the rating-related questions in Item 5, the first example omits information pertinent to Questions C and G (highlighted). Since this information contributes to the item's rating, it should be included in the Rationale Statement.

6. **Tip 6: No proper names of any kind (e.g., person, place, organization) should appear in the Rationale Statement.**

### Example: Item 11: Relationship of Child in Care With Parents

#### Instead of—

Item 11 is rated as an Area Needing Improvement because the agency made insufficient efforts to keep the mother involved in Anita's life in ways other than visitation. For example, after Anita's birthday party was scheduled to take place at The Pizza House, her mother told the

caseworker that she was unable to get there because her car was not working and she could not afford a taxi. However, the agency...

#### **Try this—**

Item 11 is rated as an Area Needing Improvement because the agency made insufficient efforts to keep the mother involved in the target child's life in ways other than visitation. For example, the agency did not assist the mother with arranging transportation to the target child's birthday party at her favorite restaurant despite the mother's notifying the agency of her lack of transportation before the party.

**Explanation:** Proper names include people's names as well as the specific names of geographic locations and work or business places. The first example uses both the child's name (Anita) and the name of a restaurant (The Pizza House). Using proper names can lead to the identification of persons involved in the case. In the second example, those names have been generalized to "the target child" and "her favorite restaurant."

- 7. Tip 7: Rationale Statements should avoid using any language (including pronouns such as I, my, or we) that imply reviewer involvement in case activities or decisions.**

#### **Example: Item 9: Preserving Connections**

##### **Instead of—**

Item 9 is rated as an Area Needing Improvement because we have made insufficient efforts to maintain the child's connections to important persons and entities...

##### **Try this—**

Item 9 is rated as an Area Needing Improvement because the agency made insufficient efforts to maintain the child's connections to important persons and entities...

**Explanation:** The use of "we" in the first example suggests that the reviewer participated in the agency's efforts (insufficient or otherwise) in the case. In the second example, "we" is replaced with the more accurate "agency."

- 8. Tip 8: Avoid using values-based commentary or judgmental language in Rationale Statements. While many ratings will invariably be based on the professional judgment and opinions of reviewers, the underlying reasoning should be presented and supported as fact.**

#### **Example: Item 12B: Needs Assessment and Services to Parents**

##### **Instead of—**

Item 12B is rated as an Area Needing Improvement because although the agency accurately assessed the mother's needs on an ongoing basis throughout the PUR, the agency failed to provide appropriate services and supervision during the time of the PUR when the child was in her care...



### Try this—

Item 12B is rated as an Area Needing Improvement because although the agency accurately assessed the mother’s needs on an ongoing basis throughout the PUR, the agency **did not** provide sufficient services and supervision to meet those needs during the time of the PUR when the child was in her care...

**Explanation:** The first example uses a judgmental term (“failed to”) to describe the agency’s inaction, which could imply a bias on the part of the reviewer. By contrast, the second example describes the same inaction without judgmental language by stating only what the agency did not do. The remainder of the Rationale Statement would then explain how this inaction caused the item’s rating with specific examples and details from the case.

- 9. Tip 9: Information that appears contradictory to the rating may be included in the Rationale Statement, but it should be provided at the end of the statement and in such a way that it’s clear the information is intended only to provide additional details regarding the agency’s activities that, while not directly supportive of the assigned rating, also do not rise to the level of changing it.**

### Example: Item 9: Preserving Connections

#### Instead of—

Item 9 is rated as an Area Needing Improvement because the agency made insufficient efforts to maintain the child’s connections to important persons, culture, and entities. The agency has not been proactive in facilitating ongoing contact between the relatives who live in the area and the target child, and it is seldom that any relatives accompany the mother to the visits except the child’s brothers, who he sees weekly. The child’s foster mother speaks Spanish, and both Spanish and English are spoken in the home; thus, the child is able to maintain his connection with his first language. The child had to change schools when he entered foster care, and no efforts have been made to keep him in touch with friends/schoolmates. The child is Muslim, and the agency has not kept the child involved with his faith; rather, he attends a Protestant church with his foster parents.

#### Try this—

Item 9 is rated as an Area Needing Improvement because the agency made insufficient efforts to maintain the child’s connections to important persons, culture, and entities. Before entering care, the child had regular contact with an aunt and uncle who continue to live near the foster home. The child indicates a desire to see his aunt and uncle but the agency has not made efforts to reach out to them and encourage or arrange any contact between them and the child. The child also had to change schools when he entered foster care, and no efforts have been made to keep him in touch with friends/schoolmates. The child is Muslim, but the agency has not made efforts to ensure the child is kept involved with his faith; rather, he attends a Protestant church with his foster parents.

The child's foster mother speaks Spanish, and both Spanish and English are spoken in the home; thus, the child is able to maintain his connection with his first language.

**Explanation:** In the first example, the highlighted information that does not support the rating is introduced in the middle of the Rationale Statement and, as a result, could confuse the reader

because it appears to support a Strength rating instead of the Area Needing Improvement rating that the item received. Rationale Statements should be written in an essay-like format so all supporting evidence follows the opening statement, allowing the reader to clearly develop an understanding with the examples that follow. While information that does not support the rating may be important to mention for context, placing it at the end of the Rationale Statement makes it clearer to the reader that it is separate from the supporting information.

**10. Tip 10: Information that is not specifically germane to the item should not be included in its Rationale Statement.**

**Example: Item 15: Caseworker Visits With Parents**

**Instead of—**

Item 15 is rated as a Strength because there has been good frequency and quality in the caseworker’s visits with the mother. The caseworker’s visits with the mother...

...The whereabouts of the child’s biological father are currently unknown. However, the child does maintain a close connection with several paternal relatives, including his paternal grandmother, who was present during several caseworker visits to the home. The father, however, is not applicable to this item.

**Try this—**

Item 15 is rated as a Strength because there has been good frequency and quality of caseworker visits with the mother. The caseworker’s visits with the mother...

...The whereabouts of the child’s biological father are currently unknown and he is therefore not applicable to this item.

**Explanation:** While it is appropriate to address and explain the fact that the child’s father is not applicable to the rating of Item 15, the first example provides additional details about the child’s relationship with relatives that are not at all relevant to Item 15’s rating. The second example removes all these details, which would be more appropriately covered in Item 9 (Preserving Connections).