

## Reviewer Brief:

# Application of CFRS OSRI, Item 2: Services to Family to Protect Child(ren) in the Home and Prevent Removal or Re-Entry Into Foster Care

### Purpose

This reviewer brief provides guidance for applying Item 2 of the Onsite Review Instrument and Instructions (OSRI) in Child and Family Services Reviews (CFSR) Round 4. Emphasis is placed on the applicability criteria, key questions that inform the rating determination, and making distinctions between appropriate services that should be addressed under Item 2 and those relevant to the Well-Being items in the OSRI.

### Background

In CFRS Round 3, OSRI Item 2 was applicable to a case under review only if there was a child “safety” concern and services (referred to as “safety-related services”) were needed to prevent foster care entry/re-entry during the period under review (PUR). CFRS Round 3 guidance emphasized that services aimed at addressing child “safety” versus “risk” of child abuse/neglect (risk) should be captured separately under OSRI Items 2 and 12 (or the appropriate Well-Being item), respectively. However, a salient observation soon began to emerge that making distinctions between child safety and risk was not always useful in terms of achieving the purpose of OSRI Item 2, which is to assess whether concerted efforts were made to provide services to the family to prevent foster care entry/re-entry. This was a concern particularly for in-home services cases because they were then rated as “not applicable” for Item 2 if reviewers determined children to only be at “risk” of child maltreatment (e.g., “high risk”) versus being subject to an actual “safety concern.” As a result, children determined to be at high risk of abuse/neglect and who could benefit from services to reduce that risk from escalating into a situation that may require removal from the home were not rated for Item 2.

**Risk** refers to the likelihood, chance, potential, or probability of child abuse and/or neglect occurring in the future. Risk that is not adequately addressed in a timely manner can escalate and become a safety threat.

**Safety** refers to a current condition within a home or family and considers whether there is an immediate threat of danger to a child.

In CFRS Round 4, the instructions under OSRI Item 2 have been modified so that reviewers now consider both child safety and risk of child abuse/neglect (child safety and/or risk) when determining whether appropriate services were provided to the family to protect children in the home and prevent foster care entry/re-entry. In addition, while OSRI “Frequently Asked Questions” have provided guidance on how to apply Item 2 to circumstances when a child is temporarily placed by a parent with an alternative caregiver (an occurrence that is not uncommon in cases reviewed during the CFRS),

this alternative caregiver arrangement is more clearly addressed in the CFSR Round 4 OSRI applicability criteria, instructions, and key questions to inform the item rating.

## Application Issues

### Initial Steps in Applying OSRI Item 2

“**Appropriate Services**,” for the purposes of Item 2, are those that are provided to, or arranged for, the family (including any services for alternative caregivers) with the explicit goal of (1) addressing the case-specific safety concerns of the child(ren) and/or risk of child abuse/neglect, and (2) doing so within a timeframe needed to prevent a child’s entry into foster care and/or re-entry after a reunification. As a guiding principle, appropriate services are:

- **Tailored** to meet the specific needs of families;
- **Culturally appropriate** with providers who can speak the language of the family;
- **Accessible** to the family (consider hours of service and location, special accommodations needed for individuals with a disability, transportation, affordability of any costs/fees, onsite childcare/childcare needs, and wait lists);
- **Provided in a setting** that is most effective and responsive to needs (consider availability of appropriate services offered by providers in community/neighborhood-based organizations and/or services offered in the home versus an office setting); and
- **Monitored** to ensure that family needs are met.

The OSRI Item 2 applicability criteria will help reviewers focus on critical stages of an open case (e.g., in-home services vs. foster care), relevant case circumstances (e.g., alternative caregiver arrangements), and transitions (e.g., trial home visits) to address key questions about any services needed by the family to prevent foster care entry/re-entry during the PUR.

At the same time, the application of OSRI Item 2 should be informed by the comprehensiveness and accuracy of safety and risk assessments completed by the agency and other relevant information captured under OSRI Item 3. It is particularly important that reviewers also consider any significant gaps, such as child safety and/or risk concerns, that were not appropriately identified in the assessments completed by the agency. The intent of the questions below is to generate an in-depth

understanding and discussion among the review team (e.g., reviewers and QA staff) related to any child safety and/or risk concerns in a case under review to inform the application of OSRI Item 2.

- What were the identified child safety and risk concerns for all children in the family? Were there any significant gaps in the safety and/or risk assessments (formal or informal)?
- What services were needed and/or provided to the family to address each of the child safety and risk concerns identified?
- What safety and/or risk concern(s) were not addressed by appropriate services?

- If an alternative caregiver arrangement was in place during the PUR, were appropriate services provided to the:
  - Alternative caregiver to prevent foster care entry/re-entry of any child living temporarily in the home?
  - Parent to ameliorate the underlying issues that created the risk/safety concern requiring the alternative caregiver arrangement?
- For families receiving in-home or reunification services for a prolonged period of time, what are the child safety and/or risk concerns that continue to exist, and are the services being offered appropriate to address these concerns?

### Services to Prevent Foster Care Entry/Re-Entry: Child Safety and Context of Risk Concerns

In CFSR Round 4, there are no substantive changes in how OSRI Item 2 is applied to cases when there are child safety concerns as specified in the applicability criteria. However, for OSRI Item 2, “risk” concerns should be placed in the context of the need for appropriate services to prevent foster care entry/re-entry for a child in the foreseeable future. In other words, do any concerns related to “risk” rise to the level of requiring services aimed at the prevention of foster care entry/re-entry? Moreover, in keeping with the definition of “appropriate services” under OSRI Item 2, reviewers should be mindful of the “explicit goal” of services aimed at addressing any “risk” concerns. In some circumstances, the same service may appropriately be addressed in OSRI Item 2 as well as in Well-Being items, depending on the explicit goal of the service. Further guidance on services addressed in OSRI Item 2 and/or Well-Being items is provided below.

### Alternative Caregiver Arrangements and Safety Plans

Alternative caregiver arrangements and safety plans are inherently temporary approaches to ensure child safety and prevent foster care entry/re-entry but are not “services,” per se. While the appropriateness and monitoring of safety plans are addressed in OSRI Item 3, any services that are needed to support, implement, maintain, or supplement such approaches to ensuring child safety should be addressed under OSRI Item 2. In addition, services needed to ensure the child can be returned to a parent after an alternative caregiver arrangement ends should also be captured under OSRI Item 2. As an example, consider the following scenario:

In an open in-home services case under review, an accurate and comprehensive assessment identified child safety concerns during the PUR related to the parent’s substance use. As a result, the agency and parent developed and agreed to a safety plan that specified the 3-year-old child would temporarily live with a relative (grandparent in this scenario) and, at the same time, identified appropriate services to be provided to the caregiver and parent aimed at preventing the need for foster care.

**Safety-related services** are those that are designed or expected to produce an immediate impact on safety concerns. They may manage, reduce, or change unsafe behaviors and circumstances, and they typically would be provided in the home.

In this brief scenario, OSRI Item 2 would be applicable for the following reasons:

Childcare services were provided to support the alternative caregiver arrangement because without such services the child may have to enter foster care.

Services were also provided to the parent to address the safety issues in the family that required an alternative caregiver arrangement. Specifically, there was an immediate need for inpatient substance abuse treatment services by the parent so the child could safely return to the home and prevent entry into foster care.

### Distinctions Between Appropriate Services Addressed Under OSRI Item 2 and Well-Being Items

In CFSR Round 4, the OSRI will continue to review the casework practice associated with how an assessment of “risk” is addressed by the agency. Whether a service to address risk concerns is captured under OSRI Item 2 or in the appropriate Well-Being items will be driven by the explicit goal of a service, as used in the definition of “appropriate services.” Reviewers should consider the following question to inform whether services to address risk concerns should be captured in OSRI Item 2 or the appropriate Well-Being item:

- Does any risk (child abuse/neglect) concern rise to the level of requiring services aimed at, and with the explicit goal of, the prevention of foster care entry/re-entry in the foreseeable future? If the answer to the above question is yes, the service should be captured under OSRI Item 2; if no, the service will be addressed under the appropriate Well-Being item.

Consider the following case review scenario: A reviewer determines the agency completed a comprehensive assessment, which identified that an older youth in the home was at high risk because of the threat of violence due to interpersonal conflict. As a result of this assessment, it was determined that counseling services were needed to address the relationship between a parent and an older youth to prevent removal. Therefore, services to address the issues related to high risk would be captured under OSRI Item 2.

Next, consider an alternative to the above scenario: It was determined after the completion of a comprehensive assessment that while there was conflict in the home, it was low risk, and there was no threat of violence. However, counseling services for the parent and older youth were needed to address interpersonal communication needs and improve the emotional and social well-being of the older youth in the home. Services to address the issues related to low risk would be captured under OSRI Item 12.

Initially, **intensive inpatient treatment** to address **parental substance abuse** might be needed to prevent foster care entry (Item 2), for example. However, **aftercare treatment** (AA/NA, Sober Living, or Outpatient) may be necessary to ensure ongoing sobriety (Item 12).

### Circumstances When the “Same Service” is Captured in OSRI Item 2 and the Appropriate Well-Being Item

It is important to emphasize that the same service may be appropriately considered under OSRI Item 2 as well as other Well-Being items. In the scenario above that illustrated the use of an

alternative caregiver arrangement, childcare services would be appropriately addressed under OSRI Item 2, and could also be captured under OSRI Item 12A if the service was intended to meet the child's socialization needs as well. Similarly, substance use and domestic violence services may be provided to parents with dual (or multiple) explicit goals of preventing the foster care entry/re-entry of a child (OSRI Item 2) and meeting their well-being needs associated with mental/behavioral health, social functioning, and capacity to develop and sustain nonviolent relationships (OSRI Item 12B).

Case-specific circumstances across different points in time during the PUR may be a factor in determining that the same service (or same type of service) would be captured in both OSRI Items 2 and 12. For example, concrete services (e.g., cash assistance) may be needed to prevent a child's removal (e.g., by maintaining electricity during extreme temperatures) and addressed in OSRI Item 2 but also captured under OSRI Item 12B (e.g., housing deposit) at a later point during the PUR. Medical services to prevent foster care entry/re-entry may be needed, in part, to address an infant's immediate "failure to thrive" condition (OSRI Item 2) as well as the infant's health/well-being (OSRI Item 17). However, 6 months later during the PUR, and contingent upon different case-specific circumstances, such medical services (e.g., well-baby check-ups), would be captured under OSRI Item 17.

## Summary Points

- Whether an evident child maltreatment concern is identified as a "safety" or "risk" concern should not be a barrier to addressing any services needed by a family to prevent foster care entry/re-entry under OSRI Item 2.
- In CFSR Round 4, there are no substantive changes in how OSRI Item 2 is applied to cases when there are child safety concerns.
- When considering services to address "risk" under OSRI Item 2, the following question may be helpful: "Does any risk (child abuse/neglect) concern rise to the level of requiring services aimed at, and with the explicit goal of, the prevention of foster care entry/re-entry in the foreseeable future? If the answer to the above question is yes, the service should be captured under OSRI Item 2; if no, the service will be addressed under the appropriate Well-Being item.
- While there are distinctions between services best captured under OSRI Item 2 (services to prevent foster care entry/re-entry) versus Well-Being items (e.g., OSRI Item 12), they are not always mutually exclusive. Consider case-specific circumstances to determine when casework practice is more effectively captured across OSRI Item 2 and the relevant Well-Being items using an "and/both" approach versus an "either/or" perspective in applying the OSRI.
- As with many items across the OSRI, the application of OSRI Item 2 will require professional judgment, particularly considering the array of formal and informal safety and risk assessments used in casework practice and the array of multidimensional services available to the field.