

FFA Investigations

(Revised 12/02/22)

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Forms

The following forms are referenced in this file:

- 04-51A Critical Incident Report
- 04-184 CWS Suspected Child Abuse Report
- 04-310 Inter-Departmental Correspondence FFA and STRTP Complaint and Feedback Form

Introduction

This policy describes the activities of all parties involved in the investigation and follow-up of child abuse and neglect allegations when a child is placed in an FFA foster home, and the alleged abuser is the FFA resource parent, an adult regularly present in the home, and/or the resource parents' family member/relative, or the FFA staff.

Policy

All allegations of abuse and neglect screened in by the Hotline as meeting criteria for an in-person response, follow the investigation process as outlined in the ER - Investigations.

When the alleged victim is placed in an FFA and the alleged perpetrator is a resource parent or other adult in the home or regularly present in the home, many agencies and CWS staff may be involved in the investigation including:

- Child Abuse Hotline (Hotline)
- Institutions Evaluation Unit (IEU)
- Community Care Licensing (CCL)
- Open Case Investigations (OCI)
- Law Enforcement (LE)
- Placing SW or Probation Officer, and/or Residential Services (RS) -SW

The Institutions Evaluation Unit (IEU) Monitor with the OCI worker is responsible for coordinating the investigation on FFAs when the alleged perpetrator is the FFA resource parent, an adult regularly present in the home, and/or the resource parents' family member/relative, or the FFA staff.

Policy (cont.)

If the alleged abuser is someone other than the FFA resource parent, an adult regularly present in the home, and/or the resource parents' family member/relative, or the FFA staff, the IEU does not investigate. However, if during the course of an investigation or a routine visit by a placing SW, negligence on behalf of FFA resource parent is suspected, the SW must consult with IEU.

If abuse or neglect is reported to any SW, the SW will report to the Hotline by faxing the completed the CWS Suspected Child Abuse Report (04-184).

The table below describes what a SW will do if there are concerns about an FFA home during an investigation or routine visit to the home, after first assessing the immediate safety of the youth in consultation with PSS:

If...	Then...
The concern is regarding suspicion of abuse and/or neglect	<ul style="list-style-type: none">• Per Hotline - Non-Hotline Staff Takes Referral, submit a CWS Suspected Child Abuse Report (04-184) via email to CARCWS.HHSA@sdcounty.ca.gov• Consult with IEU
The concern is not suspected abuse and/or neglect, but is a complaint regarding FFA standards or practices	<ul style="list-style-type: none">• Attempt to resolve the concern directly with the FFA; then• Consult with PSS who will also attempt to resolve the concern directly with the FFA; then• If the SW and PSS cannot resolve the concern, send a completed Inter-Departmental Correspondence <i>FFA and STRTP Complaint and Feedback Form (04-310)</i> to the IEU PSS.

If a Critical Incident Report (CIR) is needed:

- The Hotline will follow the Critical Incident Protocol and generate a CIR when applicable.
- The OCI worker will complete a CIR if one was not completed by the Hotline.

The Office of the Ombudsman (OOO) will receive the CIR, per Critical Incident Protocol and complete required noticing. The CWS Hotline will cross report all allegations against the FFA to Community Care Licensing (CCL). No CWS staff shall inform the FFA that IEU or CCL will be involved in the investigation.

Types of Allegations

Types of allegations include:

- Child Abuse/Neglect –all referrals for service which allege that a child is endangered by abuse, neglect, or exploitation.

Types of Allegations (cont.)

- Other concerns/complaints:
 - Care and supervision or Personal rights – (i.e., not letting child have enough clothes or own clothes, not letting child call SW)
 - Any non-criminal act or omission that infringes upon the basic rights of a child
 - Punishment or discipline in violation of the Foster Youth Bill of Rights (ie. withholding visitation, removing contact with providers or permanent connections, etc.)
 - Complaints about the quality of care other than abuse or neglect

Roles and Responsibilities

The following table describes the roles and responsibilities of each responding agency and unit staff if a referral meets criteria for in-person response to investigate abuse and/or neglect in an FFA home:

Who	What
Hotline SW	Hotline SW will complete intake and assignment of referral as outlined in Hotline - Assignment of Referrals.
OCI/ER SW	<p>For all FFA investigations, in addition to ER - Investigations policies:</p> <ul style="list-style-type: none"> • Assigned primary on the referral • Coordinate investigation with assigned IEU worker to respond to the allegations • Follow Child Victim Witness Protocol • Assist IEU and CCL as requested • Interview the alleged victim child and caregiver. Note: Other children in the home cannot be interviewed unless they have an open referral and the SW is assessing their safety and risk, or they have parent permission to be interviewed as a collateral. • Interview bio-parents as perpetrators, non-protecting parents, or collaterals based on the allegation Note: Do not contact parents if their parental rights have been terminated, unless they are a witness, collateral, or alleged perpetrator to the allegation incident. • Attend Child Protection Team meetings • Attend any additional forensic services • Determine risk/safety of the child utilizing the appropriate Structured Decision Making (SDM) tools based on the household with allegations.

Roles and Responsibilities (cont.)

Who	What
OCI/ER SW (cont.)	<ul style="list-style-type: none"> • Generate companion referrals if needed for other youth who may have experienced or be at risk of abuse or neglect in the FFA home • Consult with IEU when reaching a decision about the disposition on the child abuse allegation to ensure concurrence regarding the assessment. • Verify that IEU has completed their investigation prior to closing the referral in CWS/CMS • Update the perpetrator's name in the Client Notebook once the perpetrator is identified, regardless of the outcome of the investigation. The Allegation Notebook must indicate perpetrator type as "SCP/Res. Facility Staff". <p>If the referral is on a youth with an open case, per ER - Open Case Investigations:</p> <ul style="list-style-type: none"> • Notify CLS of investigation and any Child and Family Team (CFT) meetings • Attend any CFT meetings with the case carrying SW • Coordinate Multi-Disciplinary Team (MDT) meeting with case carrying SW, as needed or required by Case Consultation policy. • Make any placement decisions in consultation with the assigned case carrying SW and the CFT • If ICWA applies, coordinate the investigation, assessment, and interventions with the youth's tribal representatives.
IEU Monitor	<ul style="list-style-type: none"> • Contact the following to coordinate the investigation: <ul style="list-style-type: none"> ○ Investigating SW ○ Case carrying SW (if applicable) ○ CCL ○ LE (as applicable) ○ Probation (if applicable) <p>Note: It is <u>highly recommended</u> that all interviews be done jointly.</p> <ul style="list-style-type: none"> • Interview FFA staff, including the alleged staff perpetrator and any other staff with information regarding the allegation and facility functions • Provide investigating and case carrying social workers with information needed to assess safety, risk, and placement needs of the youth involved. • Assess the FFA's compliance with their contract and youths' rights.

Roles and Responsibilities (cont.)

Who	What
CCL	In coordination with IEU, investigate the FFA’s compliance with FFA licensing requirements.

Note: Verbal and written information are to be shared among all staff involved in the investigation, as appropriate.

Concluding an FFA Investigation

After completion of interviews, information gathering, and assessment, the investigating SW will:

- ensure that IEU has completed their investigation. Do not close the CWS/CMS referral until IEU has completed their investigation.
 - consult with IEU to ensure there is an agreement with the disposition on the abuse allegation. If there is a disagreement, elevate to the manager.
 - follow closing and next steps procedures outlined in the ER-Investigations and OCI policies.
 - update the allegations and alleged perpetrators to reflect investigation information.
 - update the “Occurrence Information” field on the ID tab of the Allegation Notebook for all substantiated referrals
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Alignment with SET

This policy supports [SET Values 1, 3, and 4](#) by working together with agency and community partners to ensure the safety of youth in congregate care settings.
