

**Program and Operational Changes Supported by CONNECTIONS
Impact Analysis: Consolidating a New Investigation into an Open Investigation**

Subject: CPS Investigation

Functional Area: Consolidating a New Investigation into an Open Investigation

Brief Description of Current Function/Process:

Local Departments of Social Services are responsible for investigating reports that are received by the State Central Register (SCR). If a report is received on a case in which there is a report under investigation, this second report is recorded as a Subsequent Investigation unless it is a duplicate of the report under investigation. In order for the SCR to determine that the report type is “Duplicate”, there must be an open CPS investigation and another report is registered which involves the same or similar account of the incident, with no other additional subject(s), allegation(s) or MA/AB children or the same or similar incident is reported with fewer subject(s), allegation(s) or MA/AB children. If the report continues as a “Subsequent,” the LDSS is required to complete and to document all of the tasks required during an investigation, some of which could be duplicative of the tasks and documentation for the first investigation.

What Remains the Same:

- The Local District is still required to investigate all allegations of abuse and maltreatment, to make a determination as to whether there exists credible evidence to support the allegations, assess safety and risk and to document the investigation activities.
- The SCR will still have the capability of recording an Intake as “Duplicate” and the Local District will continue to have the capability of changing an intake report type to “Duplicate” if the subsequent report meets the criteria for a duplicate report.

What is New or Changed:

- Consolidated Investigations functionality provides the ability to close an investigation stage associated with some subsequent reports by selecting the new investigation status, “close as duplicate.” This negates the need to document a full, separate investigation and to generate separate notice letters, etc. A supervisor must approve the Investigation stage closure reason in the same manner that all investigation conclusions are approved.
- When incorporating new information into an on-going open Investigation stage, caseworkers and supervisors must complete all the required activities and documentation associated with a child protective investigation within the allowable determination timeframe of the previous report.

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Implications/Considerations:

Note: Guidelines for Consolidated Investigations and Creating a Duplicate Investigation Stage are to be issued soon.

System

- In order for an Investigation to be “closed as duplicate” and consolidated into the on-going open Investigation stage in CONNECTIONS, there are a number of steps that the worker must take to prepare the Investigation stage for consolidation with the on-going investigation, including that all the persons/allegations in the “to be closed” Investigation are contained in the report remaining open.
- The “Close as Duplicate” process can be completed in the Investigation Conclusion window once the system has verified that all requirements have been met to support the appropriate consolidation of investigations.
- A supervisor must approve the Investigation stage closure reason, in the same manner that all Investigation Conclusions are approved.

Program

- Each district will need to develop and communicate the guidelines for consolidation that they will use prior to the functionality becoming available to caseworkers and supervisors.
- There are two key considerations when deciding whether or not to consolidate a subsequent Investigation stage into an on-going open Investigation stage:
 - Is there sufficient time in the prior on-going open investigation stage, to adequately investigate and determine any new allegations and assess the safety of all of the children?
 - Should the new report be maintained as a separate investigation?
- The flexibility offered to districts in determining their own policies and procedures for consolidating investigations will provide for local control and fit with local needs and capabilities. However, it also requires that each district assess the impact of consolidation on their case assignment processes, the degree of discretion in decision making to be given to supervisors, the type of cases that they want to deem as eligible for consolidation, the district’s current ability to reach determinations within 60 days, etc.
- Districts may want to assess their experience with consolidated investigations and plan for a periodic review of those cases, reviewing determination timelines, investigation and assessment thoroughness, caseworker feedback regarding their ability to engage families’ cooperation with the investigation, assessment and service plan.
- Districts’ ability to maintain engagement with families may be enhanced as the investigation of multiple reports (within 59 days of the initial) and the associated assessment activities should be seamless and less fragmented into distinct processes, procedures and notices.

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Recommendations/Next Steps:

1. Local districts need to distribute the OCFS ADM (to be available prior to Build 16) on consolidated investigations to assure that all CPS staff are aware of the rationale for and the process of consolidating investigations.
2. Local districts should assess their performance in reaching determinations within the required 60-day timeframe and assess the impact that consolidating investigations may have on their ability to adhere to that timeframe.
3. Local districts should consider the need to inform their attorneys, the court and mandated reporters in their community about the consolidation process so that the community is assured that a “suspended investigation” and a consolidated report do not imply a less thorough investigation and assessment of reports of maltreatment.
4. Local Districts will need to decide whether to adopt the OCFS Guidelines for Consolidated Investigations as their local policy in total or further develop local policies in conjunction with the OCFS Guidelines. Local Districts will need to notify their respective Regional Offices of their intent. The Regional Office will review and sign-off on any locally written policy, if applicable.