



June 2021
PE 21-02-636

PERFORMANCE REVIEW

The Bureau for Children and Families Child Protective Services

AUDIT OVERVIEW

The Bureau for Children and Families Allocates Positions for Child Protective Services Workers Based Mainly on Caseload Data; However, Incorporating Child Population and Poverty Rates in the Allocation Process Should Be Considered.



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John Sylvia
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March 29, 2021

The Honorable Mark Maynard
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The Honorable Brandon Steele
West Virginia House of Delegates
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Dear Chairs:

Pursuant to the West Virginia Performance Review Act, we are transmitting a Performance Review of the Bureau for Children and Families, Child Protective Services. The issue covered herein is *"The Bureau for Children and Families Allocates Positions for Child Protective Services Workers Based Mainly on Caseload Data; However, Incorporating Child Population and Poverty Rates in the Allocation Process Should Be Considered."*

We transmitted a draft copy of the report to the Bureau for Children and Families on February 4, 2021. We held an exit conference on February 10, 2021. We received the agency response on February 17, 2021.

Let me know if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "John Sylvia".

John Sylvia

Joint Committee on Government and Finance

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EXECUTIVE SUMMARY

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor conducted a Performance Review of the West Virginia Department of Health and Human Resources' Bureau of Children and Families (BCF) pursuant to West Virginia Code §4-10-8. The objectives of this audit were to identify and review the BCF's child protective service worker allocation process and determine if other methods should be used.

Frequently Used Acronyms in This Report:

PERD – Performance Evaluation and Research Division

BCF- Bureau of Children and Families

CPS- Child Protective Services

Report Highlights:

Issue 1: The Bureau for Children and Families Allocates Positions for Child Protective Services Workers Based Mainly on Caseload Data; However, Incorporating Child Population and Poverty Rates in the Allocation Process Should Be Considered.

- The BCF allocates CPS workers based on the percentage of accepted CPS cases to a region and district. While the agency allocates based on this method most of the time, it does allow for exceptions, which changes the allocation in two or more districts.
- Child population and poverty data have higher correlations to accepted CPS cases than the BCF's current allocation process. Since these variables correlate highly to accepted CPS cases, the BCF is indirectly considering them in its allocation process.
- While the current allocation process keeps the caseload numbers in line with national standards, it does not consider vacancies. When the number of vacancies is considered, the actual caseload is much higher than the allocated caseload.
- The backlog of CPS cases is not included in the caseload totals for allocation.

PERD's Response to the Agency's Written Response

On February 17, 2021, PERD received a written response to the report from the agency's Commissioner of the Bureau for Children and Families, which can be found in Appendix C. The agency generally agrees with the overall findings and recommendations of the report. The BCF drafted proposed legislation regarding the report recommendations and plans to complete a study on the workload for CPS workers to determine whether child population and poverty rate should be incorporated in the allocation formula. The proposed bill, HB 2620, was introduced February 19, 2021. In addition, the agency proposes a study of the salaries and benefits for CPS workers in other states.

Recommendations:

1. *The Bureau for Children and Families should consider examining or incorporating other variables that are significantly correlated with CPS referrals and accepted cases, such as child population and the poverty rate, as part of the process of allocating CPS workers authorized positions throughout the state.*
2. *The Bureau for Children and Families should consider implementing the recruitment and retention recommendations outlined in the 2019 Post Audit Division's report on the agency's Child Protective Services.*

ISSUE 1

The Bureau for Children and Families Allocates Positions for Child Protective Services Workers Based Mainly on Caseload Data; However, Incorporating Child Population and Poverty Rates in the Allocation Process Should Be Considered.

Issue Summary

Once a year, typically in March or April, the Bureau for Children and Families (BCF) redistributes authorized positions for child protective services (CPS) workers at its regional offices based on proportional percentages of a region's CPS caseload data of the prior year. One reason for this redistribution process is to achieve recommended standards for the number of CPS cases per worker. The Chairs of the Joint Committee on Government Organization requested that the Performance Evaluation and Research Division (PERD) compare the efficacy of the agency's current redistribution of positions for CPS workers to an alternative approach of allocating positions based on county child population data. PERD finds that although the agency's allocation of CPS workers positions is reactive and does not incorporate analytics outside of CPS caseload, it is reasonably effective and has some flexibility for agency discretion. Although child population is strongly correlated to CPS caseload, PERD found that using it in the allocation process does not give significantly different results than the agency's current process. Nevertheless, PERD finds that child population data as well as county poverty rates are viable options to consider in the agency's CPS position allocation methodology.

PERD finds that although the agency's allocation of CPS workers positions is reactive and does not incorporate analytics outside of CPS caseload, it is reasonably effective and has some flexibility for agency discretion.

The Agency's Method for Allocating CPS Workers Has Merit But Alternative Approaches Should Be Considered.

In order to manage CPS workers and other personnel, the BCF organizes the state into districts and regions. The BCF assigns or allocates a specific number of workers based on a percentage of the regions' CPS caseloads. Allocating is not the actual hiring of an individual. Rather, allocating is assigning to specific districts and regions the authorization to hire full-time equivalent (FTE) positions. The Deputy Commissioner of Field Operations tracks allocations by using a tracking log for FTE positions for CPS workers. The BCF periodically changes or reallocates¹ worker positions within CPS districts and regions, normally in March or April. The Deputy Commissioners of Field Operations and regional directors determine changes based on district and regional caseload reports compared to BCF's reports on staffing and caseload. Each region receives a percentage of the total staff positions based on the percentage

Allocating is not the actual hiring of an individual. Rather, allocating is assigning to specific districts and regions the authorization to hire full-time equivalent (FTE) positions.

¹ Reallocation allows the BCF to meet the caseload standards of both the Child Welfare League of America (12 to 17 cases per worker) and the Council of Accreditation (12 to 18 cases per worker) for CPS workers. This is the average caseload per worker with all positions filled.

of referrals and cases per region. For example, if a region has 30 percent of the statewide intake calls and cases, the region receives 30 percent of the available staff. If a district has a significantly high caseload, the agency may reallocate positions from one area to another. If the BCF decides to reallocate a position currently filled, the position is not moved until vacant. As a result, the BCF keeps monthly records of allocations and reallocations.² The DHHR may also change districts for BCF and CPS which affects the allocation in specific areas.

Given the directive to examine the BCF's process of allocating (and reallocating) authorized CPS positions based on total CPS caseload, PERD conducted a series of correlation analyses on factors that may drive changes in caseloads. This analysis not only evaluates the BCF's current methodology but also determines if an alternative approach is warranted or if other variables should be considered. The variables that were assessed include each district's child population, the county poverty rate, and opioid deaths.

Table 1 shows the results of the correlation analysis. A district's child population and its poverty rate have the highest correlation to referrals and accepted cases, with correlation coefficients between 0.92 to 0.95.³ These variables are prominent in West Virginia. However, it should be noted that correlation is a measure of association between variables but does not necessarily indicate causation. Child population has the strongest correlation to referrals and the second strongest correlation to accepted cases. The BCF indicated that it does not use these data in determining where to distribute authorized CPS positions. The BCF's current allocation method based on a percentage of accepted cases shows a relatively high correlation of 0.89. This should be expected since the agency's allocation process is designed to correlate to the number of accepted CPS cases. It also suggests that the agency does reasonably well in correlating authorized positions to accepted cases. Moreover, since accepted CPS cases correlate to child population and poverty, the agency's allocation process has a measure of correlation with these demographic statistics. This is shown in the relatively high correlation (0.86) between the poverty rate and allocated CPS positions, and a less robust correlation (0.71) between child population and allocated CPS positions.

However, given the high correlation of the poverty rate and child population to accepted CPS cases and referrals, the BCF should consider them as viable principal factors in allocating authorized CPS positions or

Child population has the strongest correlation to referrals and the second strongest correlation to accepted cases.

² The DHHR has also reallocated positions within the agency by shifting them from other areas of DHHR to CPS. In 2018, the BCF shifted 48 positions to CPS from other areas of DHHR to create new FTE positions for CPS workers, and in 2019, 12 full-time CPS workers were added.

³ CPS referrals include cases that are accepted for investigation and referrals that are not accepted because they do not meet the statutory definition of child abuse and neglect.

incorporate them to some extent into the current process. There are also other variables that can be considered in the allocation process such as the number of opioid deaths in a district or the unemployment rate.

Table 1 Ranking Chart of Correlation Coefficients for Select Potential Caseload Drivers FY 2018		
Rank	Correlating Factors	Correlation Coefficient
1	Child Population to Referrals	0.95
2	Poverty to Accepted CPS Cases	0.94
3	Child Population to Accepted CPS Cases	0.92
4	Poverty to Referrals	0.92
5	Allocated Positions to Accepted CPS Cases**	0.89
6	Poverty to Allocated CPS Positions	0.86
7	Allocated Positions to Referrals	0.80
8	Opioid Deaths to Accepted CPS Cases	0.77
9	Opioid Deaths to Referrals	0.73
10	Child Population to Allocated Positions	0.71
11	Opioid Deaths to Allocated Positions	0.69
<i>Source: Information provided by BCF; CPS Total Caseloads 2016-2019, CPS Allocated and Vacant Positions and U.S. Census Population. Calculations conducted by the audit team.</i>		
<i>**Allocated Positions to Cases is the correlation of the BCF's current method.</i>		

Although our analysis of opioid deaths correlation is lower than other variables, it is still a strong correlation and the federal government has conducted studies indicating a relationship between the two. Moreover, each variable correlated to referrals and cases has a high coefficient of determination. The coefficient of determination indicates the proportion of referrals explained by the variables. The coefficient of determination for allocated positions is significantly lower, indicating a likelihood of variance. For example, in the case of child population, the size of the population explains approximately 90 percent of referrals. Given the strong correlations noted for child population, and poverty, the use of these data could aid the agency in the allocation process identifying changes that may influence the number of referrals, and consequently, caseload.

Moreover, each variable correlated to referrals and cases has a high coefficient of determination...For example, in the case of child population, the size of the population explains approximately 90 percent of referrals.

Table 2 illustrates each district's child population, the percent of children living in poverty, the district's CPS worker allocation, the number of referrals accepted (cases) in a district for 2018, and the percent

of CPS cases, which involve substance abuse. As shown in Table 2, districts with child populations such as Kanawha and Berkeley/Jefferson/Morgan, accept a relatively larger number of referrals, 3,039 and 2,128, respectively. Districts with smaller child populations accept a smaller number of referrals. For example, the district of Calhoun/Gilmer/Wirt, McDowell, and Wyoming all have less than 400 referrals accepted and a child population of about 4,000.

While reviewing BCF's allocation method, PERD found that, generally, a district's allocation matched the percentage of referrals accepted as specified by the agency's policy. There were a few districts where the percentage varied slightly. This is primarily due to exceptions made by the BCF to add CPS workers to a district if needed. It is understood that on occasion there is a need for discretion in allocating CPS positions. Each district will likely have its own specific factors that will influence future caseload.

While there is a strong correlation, as noted above, between child population and cases, there are outliers in Table 2. Despite the district of Berkeley/Jefferson/Morgan having a higher child population, Kanawha has nearly 1,000 more referrals accepted and three times more CPS workers. Berkeley/Jefferson/Morgan may have the highest child population, but it has the lowest poverty rate and the least amount of substance abuse involved in CPS cases. Mercer County is an outlier as well. It has a quarter of the child population and about half of the cases of Berkeley/Jefferson/Morgan, but it has eight more CPSW allocations. Mercer County has 13 percent more children living in poverty and 8 percent more CPS cases involving substance abuse as Berkeley/Jefferson/Morgan.

Each district will likely have its own specific factors that will influence future caseload.

Table 2
Child Population, Percent of Children Living in Poverty, Allocation,
Referrals District Comparison, and Percent of CPS cases involving Substance Abuse

Districts	Child Population	Children in Poverty	CPS Worker Allocation	Referrals Accepted	Substance Abuse Cases
Brooke/Hancock/Ohio	17,374	20%	22	1,324	24%
Calhoun/Gilmer/Wirt	3,760	25%	8	327	20%
Doddridge/Pleasants/Ritchie	4,653	22%	6	407	22%
Clay/Jackson/Roane	10,897	24%	20	871	16%
Marion/Monongalia	28,586	19%	26	1,788	19%
Marshall/Tyler/Wetzel	10,700	27%	11	1,008	9%
Wood	17,621	26%	23	1,464	11%
Boone/Lincoln	9,223	38%	22	894	24%
Cabell	18,395	26%	30	1,524	15%
Kanawha	36,012	26%	61	3,039	19%
Logan	6,677	31%	10	709	19%
Mason/Putnam	18,203	15%	11	939	9%
Wayne	8,178	32%	10	483	16%
Barbour/Preston/Taylor	13,132	27%	22	944	21%
Berkeley/Jefferson/Morgan	43,053	15%	22	2,128	8%
Grant/Hardy/Pendleton	6,350	19%	6	456	13%
Hampshire/Mineral	9,728	25%	9	649	13%
Harrison	14,434	19%	13	1,186	19%
Braxton/Lewis/Upshur	11,159	32%	12	1,026	11%
Randolph/Tucker	6,502	24%	10	608	25%
Fayette	8,897	30%	11	763	30%
Greenbrier/Monroe/ Pocahontas/ Summers	12,960	28%	13	945	17%
McDowell	3,735	45%	9	358	14%
Mercer	12,199	28%	30	1,299	16%
Mingo	5,285	41%	10	541	21%
Nicholas/Webster	6,770	31%	15	627	21%
Raleigh	15,460	24%	21	1,328	26%
Wyoming	4,217	27%	9	362	22%

Sources: CPS Allocated Staff and Vacancies provided by BCF, US Census Data on Poverty, Referrals Accepted provided by BCF, and US Census Population Data 2018.

The BCF's Method of Allocating Workers Is Based on FTE Positions, Not Actual Employees. This Method Does Not Address Caseload Evenly.

For Table 3, the terms “actual cases” and “allocated cases” are used. “Actual cases” is the number of cases per worker based on the positions filled. It is the number of cases each CPS worker would have if cases were split evenly. “Allocated cases” is the number of cases based on the positions allocated to the district. It is the number of cases each CPS worker would have if all positions were filled. For example, as shown in Table 3, the Calhoun/Gilmer/Wirt district’s allocated number of positions in June 2019 was seven, down from eight in January 2019. This resulted in cases per worker of 14.57 (within the recommended per worker caseload range of 12 to 18 cases). However, the district had only four CPS worker positions filled, which resulted in the actual cases per worker of 25.5, significantly higher than the recommended individual caseload. While in the Braxton/Lewis/Upshur district, which had no change in the number of allocated positions, actual cases per worker went from 21.56 (above the recommended caseload) to 13 as the district hired 3 CPS workers. However, based on allocated positions, the number of cases per worker dropped from 16.17 to 13 (all within the recommended individual caseload). In fact, when accounting for filled positions of the 28 districts, 12 (43 percent) exceeded the recommended cases per worker. However, based on allocated positions, no district exceeded the caseload guidelines. Changes in the number of cases per worker are affected by the total number of cases in the district, as well as vacancies in the district.

As shown in Table 3, the primary issue driving variances in caseload per worker is the vacancy rate. Until the agency can increase staffing, achieving appropriate caseload per worker will be difficult. The number of vacancies imposes a significant challenge in allocating CPS positions. Table 3 illustrates the effect vacancies have on cases per worker. For example, McDowell County had only 4 positions filled in January 2019 and the actual cases per worker was 45.5. In June 2019, McDowell County hired three more CPS workers for a total of seven and their actual cases per worker dropped to 22.57. The district’s allocated cases per worker was 20.22 in January and 17.56 in June, significantly lower than the actual cases per worker. Another example of vacancy affecting cases per worker is in the district of Berkeley/Jefferson/Morgan. In January 2019, only 13 of the 22 allocated CPS workers positions were filled. During January, the district’s CPS workers had an allocated caseload per worker of 14.86 and an actual of 25.15 cases per worker. In June 2019, the district of Berkeley/Jefferson/Morgan filled 20 of the 23 allocated positions. During June, the district had an allocated caseload per worker of 11.61 and an actual caseload per worker of 13.35, a significant decrease from June.

“Actual cases” is the number of cases per worker based on the positions filled. It is the number of cases each CPS worker would have if cases were split evenly. “Allocated cases” is the number of cases based on the positions allocated to the district. It is the number of cases each CPS worker would have if all positions were filled.

Until the agency can increase staffing, achieving appropriate caseload per worker will be difficult.

Table 3
Monthly Allocated Cases and Actual Cases per Worker Comparison
January and June 2019

District	January 2019				June 2019			
	Allocated Positions	Filled Positions	Allocated Cases	Actual Cases	Allocated Positions	Filled Positions	Allocated Cases	Actual Cases
Brooke/Hancock/Ohio	22	19	18.18	21.05	25	19	12.88	16.95
Calhoun/Gilmer/Wirt	8	5	14.38	23	7	4	14.57	25.5
Doddridge/Pleasants/Ritchie	6	5	19.5	23.4	8	4	13.88	27.75
Clay/Jackson/Roane	20	17	13.6	16	20	17	11.45	13.47
Marion/Monongalia	26	20	17.08	22.2	26	20	13.58	17.65
Marshall/Tyler/Wetzel	11	10	16.36	18	12	10	12	14.4
Wood	23	21	15.87	17.38	23	21	14.48	15.86
Boone/Lincoln	22	16	15.41	21.19	23	19	13.78	16.68
Cabell	30	27	15.13	16.81	31	30	12.55	12.97
Kanawha	61	50	18.97	23.14	62	51	15.61	18.98
Logan	10	9	20.9	23.22	12	10	15.67	18.8
Mason/Putnam	11	9	18.73	22.89	12	11	15.42	16.82
Wayne	10	6	13.5	22.5	10	9	15	16.67
Barbour/Preston/Taylor	22	18	15.05	18.39	23	17	14.7	19.88
Berkeley/Jefferson/Morgan	22	13	14.86	25.15	23	20	11.61	13.35
Grant/Hardy/Pendleton	6	6	17.33	17.33	6	6	13.17	13.17
Hampshire/Mineral	9	7	14.78	19	9	6	12.56	18.83
Harrison	13	13	20.62	20.62	13	12	17.23	18.67
Braxton/Lewis/Upshur	12	9	16.17	21.56	12	12	13	13
Randolph/Tucker	10	6	15.3	25.5	11	8	13.91	19.13
Fayette	12	10	17.25	20.7	13	9	15.38	22.22
Greenbrier/Monroe/Pocahontas/Summers	13	12	13.08	14.17	13	11	13.46	15.91
McDowell	9	4	20.22	45.5	9	7	17.56	22.57
Mercer	30	22	13.93	19	29	22	12.72	16.77
Mingo	9	8	14.11	15.88	8	7	13.88	15.86
Nicholas/Webster	15	13	18.53	21.38	15	12	15.87	19.83
Raleigh	21	18	15.14	17.67	21	19	14.38	15.89
Wyoming	9	5	14.67	26.4	8	5	11.75	18.8
West Virginia	472	378	16.39	20.46	484	398	13.98	17.01

Sources: The BCF provided information regarding allocation, vacancies, and monthly cases- January and June 2019.

**This chart does not include backlogged cases.

In addition to tracking current referrals and investigations, the BCF tracks backlogged cases, or cases remaining open beyond 30 days. These cases have been investigated but have not been closed. District CPS workers are responsible for backlogged cases in addition to their regular caseload. As shown in Table 4, the size of the backlog varies by district.

**Table 4
Backlogged Cases by District
August 2019**

District	Backlogged Cases
Brooke/Hancock/Ohio	419
Calhoun/Gilmer/Wirt	71
Doddridge/Pleasants/Ritchie	201
Clay/Jackson/Roane	189
Marion/Monongalia	358
Marshall/Tyler/Wetzel	287
Wood County	320
Boone/Lincoln	69
Cabell County	7
Kanawha County	115
Logan County	11
Mason/Putnam	24
Wayne County	63
Barbour/Preston/Taylor	118
Berkeley/Jefferson/Morgan	373
Grant/Hardy/Pendleton	81
Hampshire/Mineral	53
Harrison County	81
Braxton/Lewis/Upshur	245
Randolph/Tucker	176
Fayette County	18
Greenbrier/Monroe/ Pocahontas/Summers	15
McDowell County	4
Mercer County	40
Mingo County	20
Nicholas/Webster	14
Raleigh County	94
Wyoming County	29
State total	3,495

District CPS workers are responsible for backlogged cases in addition to their regular caseload.

Source: BCF provided COGNOS Backlog report
 Note: This is a snapshot as of August 2019 and the backlog numbers change monthly.

Cabell's backlog was seven cases, while McDowell had four. However, other districts had well over 300 backlogged cases, such as Berkeley/Jefferson/Morgan and Marion/Monongalia. The district of Brooke/Hancock/Ohio had 419 backlogged cases, the highest in the state. As of August 2019, the state backlog was nearly 3,500 cases.

Conclusion

In response to the request made by the Chairs of the Joint Committee on Government Organization, PERD concludes that using district child population data to allocate CPS workers positions is viable and worthy of consideration by the BCF. The district poverty rate is also an important variable that correlates to CPS cases. However, PERD also finds that the use of these variables provides results that are similar to the agency's current method of allocating CPS workers positions. The reason for the similar results is that the agency's allocation process is designed to have a high correlation with caseload data. Therefore, the agency's allocation process indirectly correlates with child population and the poverty rate. Nevertheless, PERD concludes that there are several variables that correlate to CPS referrals and accepted cases. Therefore, the agency should not confine itself to only one methodology. The BCF should examine incorporating, to some extent, child population and the poverty rate data.

Regardless of what variables are used in the allocation of CPS workers positions, the process will be challenged in achieving the appropriate caseload per worker unless the number of vacancies are reduced. If vacancy rates remain high, the agency will have to make periodic adjustments in allocating authorized CPS positions. PERD found that of the 28 districts, 12 (43 percent) meet or exceed the maximum recommended caseload per CPS worker. However, this does not include backlogged cases. With 3,495 cases statewide, the inclusion of backlogged cases in a CPS worker's caseload would likely result in more districts exceeding the maximum caseload of 18 cases per CPS worker. Thus, until the BCF can decrease the vacancy rate, the caseload per CPS worker will continue to be an issue. If all allocated positions were filled, every district would be under the recommended maximum caseload per CPS worker. The Legislative Auditor recommends the BCF consider implementing the recruitment and retention recommendations outlined in the 2019 Post Audit Division's report of the Department of Health and Human Resources' Child Protection Services.

“The allocation process indirectly correlates with child population and the poverty rate. Nevertheless, PERD concludes that there are several variables that correlate to CPS referrals and accepted cases. Therefore, the agency should not confine itself to only one methodology.”

Regardless of what variables are used in the allocation of CPS workers positions, the process will be challenged in achieving the appropriate caseload per worker unless the number of vacancies are reduced.

Recommendations:

1. *The Bureau for Children and Families should consider examining or incorporating other variables that are significantly correlated with CPS referrals and accepted cases, such as child population and the poverty rate, as part of the process of allocating CPS workers authorized positions throughout the state.*
2. *The Bureau for Children and Families should consider implementing the recruitment and retention recommendations outlined in the 2019 Post Audit Division's report on the agency's Child Protective Services.*

Appendix A Transmittal Letter

WEST VIRGINIA LEGISLATURE *Performance Evaluation and Research Division*

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John Sylvia
Director

February 1, 2021

Linda Watts, Commissioner
Bureau for Children and Families
350 Capitol Street, Room 730
Charleston, WV 25301

Dear Commissioner Watts:

This is to transmit a draft copy of the CPS Allocation Review. This will be presented during a future interim meeting of the Joint Committee on Government Operations, and the Joint Committee on Government Organization. We will inform you of the exact time and location once the information becomes available. It is expected that a representative from your agency be present at the meeting to orally respond to the report and answer any questions committee members may have during or after the meeting.

We have scheduled a virtual exit conference to discuss any concerns you may have with the report. It is scheduled for February 10, 2021 at 1 p.m. In addition, we need your written response by noon on Friday, February 19, 2021 in order for it to be included in the final report. If your agency intends to distribute additional material to committee members at the meeting, please contact the House Government Organization staff at 304-340-3192 by Thursday, prior to the meeting to make arrangements.

We request that your personnel not disclose the report to anyone not affiliated with your agency. Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "John Sylvia".

John Sylvia

Enclosure

Appendix B

Objectives, Scope and Methodology

The Performance Evaluation and Research Division (PERD) within the Office of the Legislative Auditor conducted a Performance Review of the West Virginia Department of Health and Human Resources' Bureau of Children and Families (BCF) pursuant to West Virginia Code §4-10-8. The purpose of the BCF is to provide services to West Virginia children and families.

Objectives

The objectives of this audit were to identify and review the BCF's child protective service worker allocation process and determine if other methods should be used. In addition, the audit is to review if population is considered in staffing allocation.

Scope

The scope of this review focused on the allocation methods utilized for the placement of Child Protective Service Workers. The period for the audit is fiscal years 2016 through 2019. However, the primary focus of the audit was 2019 data.

Methodology

PERD gathered and analyzed several sources of information and conducted audit procedures to assess the sufficiency and appropriateness of the information used as audit evidence. The principal research methods used include interviews, emails, data analysis, and documentation review.

Testimonial evidence was gathered through interviews with the BCF staff, through email and official correspondence. Discussions involved caseload data, processes for allocation, allocation numbers, backlog cases, and reports used by the BCF.

PERD staff received information from the BCF and used this information in correlations between various caseload drivers and the number of Child Protective Service workers. PERD also utilized data from the U.S. Census Bureau including child population, and poverty statistics. PERD calculated actual cases per worker and allocated cases per worker.

PERD staff reviewed a variety of agency documents including staffing allocation, vacancy, backlog, caseload per month, and substance abuse cases. PERD also reviewed reports and documents from other states to determine what methods other states use in allocating staffing, as well as federal agency recommendations. In addition, PERD staff contacted personnel from offices in other states, equivalent to BCF.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Appendix C

Agency Response



STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES

Bill J. Crouch
Cabinet Secretary

Bureau for Children and Families
Commissioner's Office
Office of Field Support
350 Capitol Street, Room 730
Charleston, West Virginia 25301-3711
Telephone: (304) 558-0628 Fax: (304) 558-4194

Linda M. Watts
Commissioner

February 17, 2021

Mr. John Sylva, Director
Performance Evaluation and Research Division
Building 1, Room W-314
1900 Kanawha Boulevard, East
Charleston, West Virginia 25305-0610

Re: Allocation of Child Protective Services Workers Audit

Dear Mr. Sylva:

Please find attached the response of the West Virginia Department of Health and Human Resources to the Performance Evaluation and Research Division Audit Report on the allocation of child protective services workers within the districts of the Bureau for Children and Families.

Thank you for the opportunity to respond to the audit report. Please contact me at Linda.M.Watts@wv.gov or Cammie Chapman at Cammie.L.Chapman@wv.gov if you have additional questions or concerns.

Sincerely,

A handwritten signature in blue ink that reads "Linda Watts".

Linda M. Watts, Commissioner
Bureau for Children and Families

Issue 1: The Bureau for Children and Families Allocates Positions for Child Protective Services Workers Based Mainly on Caseload Data; However, Incorporating Child Population and Poverty Rates in the Allocation Process Should Be Considered.

Recommendation No. 1:

The Bureau for Children and Families should consider examining or incorporating other variables that are significantly correlated with CPS referrals and accepted cases, such as child population and the poverty rate, as part of the process of allocating CPS workers authorized positions throughout the state.

Response:

The Bureau for Children and Families (BCF) will incorporate child population and poverty rate as part of the process for allocating CPS workers authorized positions throughout the state. BCF is hoping to conduct a study of the child protective services and foster care workforce. BCF is working with the Legislature to propose a bill which specifically requires that child population and poverty rate be incorporated into the study (see attached).

Recommendation No. 2:

The Bureau for Children and Families should consider implementing the recruitment and retention recommendations outlined in the 2019 Post Audit Division's report on the agency's Child Protective Services.

Response:

BCF continues to implement its recruitment and retention plan. The following is an update on some of the areas outlined in the 2019 Post Audit Division's report:

CPS Career Ladder: The 2021 state fiscal year budget allocated two new classifications: child protective service case coordinator (CPS CC) and child protective service worker senior (CPSW Sr.). The budget created 34 CPS CC positions and 43 CPSW Sr. positions. BCF districts are still in the process of hiring for these positions. The CPSW Sr. positions are being filled by existing child protective service workers (CPSW), creating a higher vacancy rate with CPSW positions, which will require hiring additional new staff for the created vacancies. This same process is occurring with the CPS CC positions as those positions are being filled by health and human resources aides. It will take some time to realize the impact of these new classifications.

New Retention Goals: BCF has a Recruitment & Retention Committee that uses data to develop retention goals that are measurable and attainable. This effort is stymied because BCF has limited ability to obtain the types of reports it needs to set goals or track retention through wvOASIS. BCF must use hand counts and other archaic methods to track this information.

CPS Salaries: The 2021 state fiscal year budget included funds to pay CPSWs a daily rate for their scheduled on-call days. This is in addition to pay for hours worked. BCF implemented the on-call daily pay in January 2021. Over the past four years, salaries for CPSWs have increased by approximately 20 percent. BCF continues to monitor salaries of staff working in child protective services.

Designated Shift: As part of the recommendations regarding overtime use, a suggestion was made to have some positions work shifts other than standard day shifts to allow work time to be after school and evening hours, which may achieve more contacts with families and less use of overtime. Currently, BCF does this on a case-by-case basis: if a worker would request a non-traditional shift schedule, approval is generally limited to the West Virginia Department of Health and Human Resources' Policy 2102 Hours of Work/Overtime. BCF is considering a more formalized approach to allow additional staff to work evenings as a matter of routine and formal work schedules.

Equal Distribution of Caseloads: BCF is working with the regional directors and community service managers regarding the use of the data reports to review caseload distribution among the CPSW staff. Additionally, the child protective services and foster care workforce study will include a workload evaluation to ensure workloads are manageable and achieve positive outcomes for the children and families served.



WEST VIRGINIA LEGISLATIVE AUDITOR

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