

# Montana Department of Justice Office of the Child and Family Ombudsman 2024 Annual Report



**Contact the Ombudsman:**

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## Executive Summary

Welcome to the 2024 Annual Report of the Montana Department of Justice Office of the Child and Family Ombudsman (OCFO). This annual report is required by Montana Code 41-3-1211 and is a summary of activities for January 1 through December 31, 2024. OCFO has now been an office in the Montana Department of Justice for over 10 years.

The Office of the Child and Family Ombudsman's work is conducted through two primary activities: First, it responds to citizen questions and concerns about Montana's child protection system by reviewing individual Child and Family Services cases. Second, it collects and analyzes a tremendous amount of data. Both the citizens' questions and the data identify systemic issues in Montana's child welfare system, including internal Child and Family Services Division (CFSD) practices, legal and judicial system challenges, and the role of community service providers. The Office of Child and Family Ombudsman strives for effective and positive outcomes as it continues its commitment to strengthening the child protection system for those who work in it and for those who seek its assistance.

In 2024, 48% of the citizens who contacted The Office of Child and Family Ombudsman completed and submitted a Request for Assistance which is the highest rate of returned Requests since the office opened in 2014. An expansion of Outreach and Education through mailings, virtual presentations, the web site and in person events were successful.

Each year the annual report includes formal recommendations to the Department of Public Health and Human Services:

### **Recommendations to Child and Family Services Division (pg. 15):**

The casework and child fatality reviews in 2024 yielded two recommendations. Rationales are included later in this report.

**Recommendation 1:** Department of Public Health and Human Services direct Child and Family Services to train and regularly review MCA 41-3-209(1), the requirement to report child fatalities defined in this code to the Office of Child and Family Ombudsman, with all staff.

**Recommendation 2:** Department of Public Health and Human Services direct Child and Family Services to provide clear communication and documentation about the *Conditions for Return* to parents on a regular basis.

## **Mission**

The Office of the Child and Family Ombudsman responds to citizen requests to protect the rights of children and families by improving case outcomes and strengthening Montana's child welfare system.

To support its mission, the Office of the Child and Family Ombudsman follows four principles consistent with the standards of the United States Ombudsman Association (USOA).

## **Principles**

1. The Office of the Child and Family Ombudsman is independent of the Montana Department of Public Health and Human Services (DPHHS), meaning it is separate and free from the influence of the individuals whose actions the Office of the Child and Family Ombudsman reviews. It is part of the Montana Department of Justice's Division of Criminal Investigation and managed by the Special Services Bureau (SSB).
2. The Office of the Child and Family Ombudsman is impartial. The Office of the Child and Family Ombudsman treats citizens equitably and works collaboratively with all parties to improve services for the children of Montana. It may advocate certain recommendations, which benefit the individual who requested assistance; however, advocacy is always directed at improving services offered by Child and Family Services and should not be construed as supporting one individual over another.
3. The Office of the Child and Family Ombudsman is confidential. It adheres to Montana law.
4. The Office of the Child and Family Ombudsman provides a credible review process to each citizen contacting the Ombudsmen. The Office of the Child and Family Ombudsman keeps each requestor apprised of each step of the process and takes actions that improve transparency of the child welfare system.

To request assistance, contact our office in one of the following ways:

**Telephone: 1-844-25CHILD (1-844-252-4453)**

**Fax: 406-444-2759**

**Email: [DOJOMBUDSMAN@mt.gov](mailto:DOJOMBUDSMAN@mt.gov)**

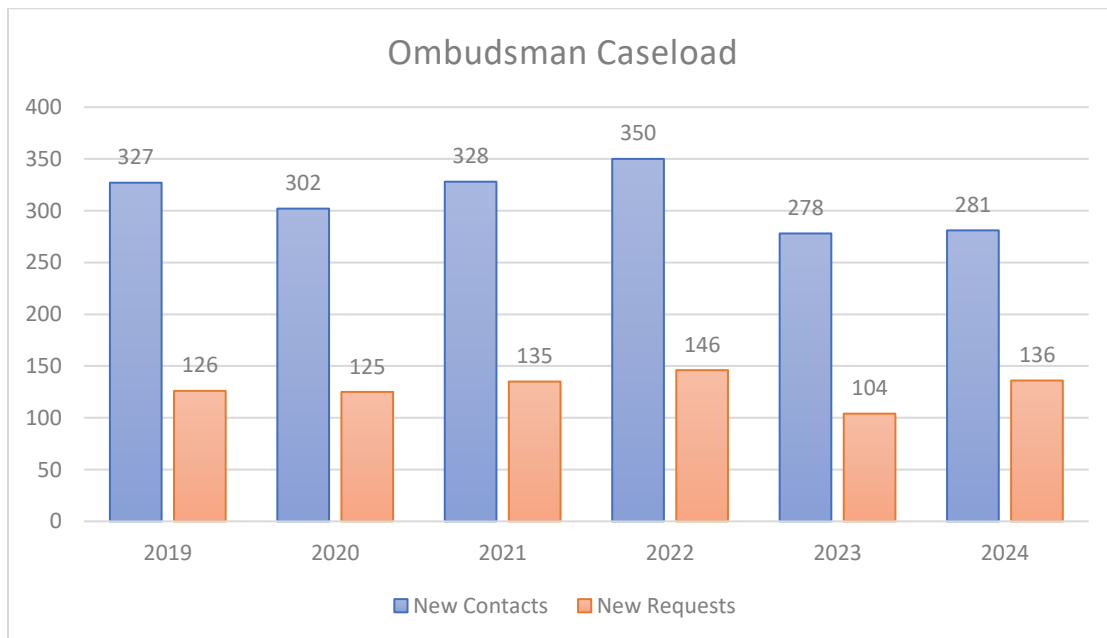
### Duty: Respond to Citizens' Requests

When a citizen calls, emails, or writes the Office of the Child and Family Ombudsman, they begin the Intake process as a *Contact*. If the Contact submits a Request for Assistance (RFA) form, they are then called a *Requestor*. The Office of the Child and Family Ombudsman reaches out to each contact at least three times to assist in completing the Request for Assistance form. The number of Contacts and Requests are collected each year. At the end of each year, open Contacts and open Requests carry over to the next year.

The Office of Child and Family Ombudsman served 233 children in 2024.

### Graph 1: Caseload per year

There were 281 total contacts of which 48.4%, or 136 contacts, returned a Request for Assistance form to open a case review.



### 2024 Contact Data

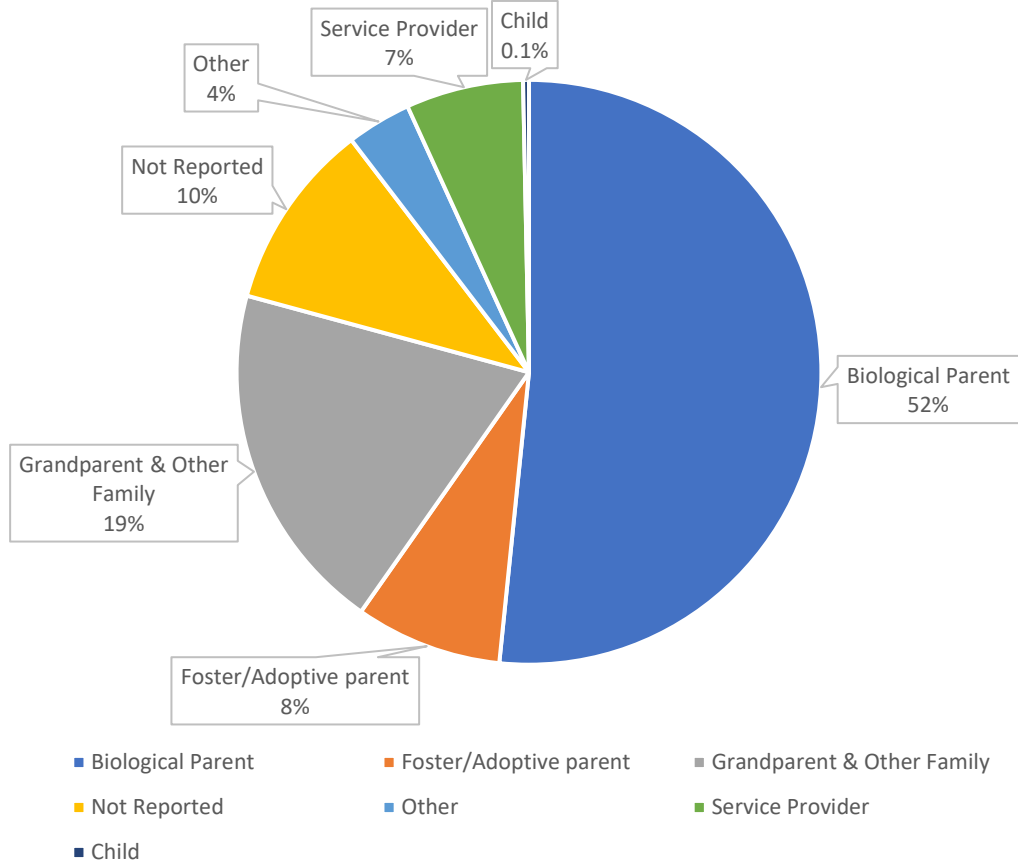
The Child and Family Services Division's statewide structure is based on six regions, each with a Regional Administrator. The number of counties and offices in each region varies. Each region has a main office and field offices, the regional map is attached to Appendix I.

### Graph 2: Contacts by Relationship to the Child

The Office of the Child and Family Ombudsman tracks the relationship between the Contact and the child, or children, identified in the concern about a Child and Family Services action.

Biological Parents were the largest category of contacts to the Office of Child and Family Ombudsman at 52% followed by Grandparents and Other Family at 19%.

Relationship to Child - All 2024 Citizen Contacts



### Duty: Investigate Findings

#### 2024 Outcomes

The Office of the Child and Family Ombudsman received 281 contacts. Of the citizen contacts within the Office of the Child and Family Ombudsman jurisdiction to investigate, 136 submitted Request for Assistance forms by the close of the year. Per Montana Code, every request must be investigated by the Office of the Child and Family Ombudsman unless it meets one of four statutory reasons per MCA 4-3-1212 to decline. Those reasons include:

- The Office of the Child and Family Ombudsman investigated previously.
- The request is vexatious or not made in good faith.
- The requestor is not personally aggrieved.
- The case is too old to justify an investigation.

It is the Office of the Child and Family Ombudsman’s practice to make three attempts to obtain a request form from a contact before closing it as a “no further contact.”

**Review Process**

The Office of the Child and Family Ombudsman case review is an investigation of all the Child and Family Services actions or omissions for a specific case. Each Child and Family Services case may include records located in three different electronic databases:

- Child and Adult Protective Services or *CAPS*
- Montana Family Safety Information Systems or *MFSIS*
- Document Generator or *Doc Gen*

Additional case specific records may also be maintained in a hard file at the Child and Family Services local office.

The range of interventions provided by the Office of the Child and Family Ombudsman includes referral to services; mediating concerns directly with the requestor and Child and Family Services; addressing concerns directly with legally mandated stakeholders; and in some cases, preparing a Findings Report which is submitted to Child and Family Services and to the citizen requestor’s who fit within MCA 41-3-205’s Confidentiality - disclosure exceptions. The Office of the Child and Family Ombudsman conducts an accurate and comprehensive case review for each citizen requester. The Ombudsmen frequently provide resources to citizens even when the case is not appropriate for The Office of the Child and Family Ombudsman services or must be declined.

Table 1 describes in more detail the outcomes of individual citizen contacts and requests for assistance.

**Table 1: Status of contacts and request forms to the Office of Child and Family Ombudsman for 2020—2024.**

<b>Outcome Measures</b>	<b>2020 Outcomes</b>	<b>2021 Outcomes</b>	<b>2022 Outcomes</b>	<b>2023 Outcomes</b>	<b>2024 Outcomes</b>
Closed, no further contact.	28%	30%	30%	21%	31%
Declined to intervene.	1%	2%	5%	4%	4%
No citizen response after review opened*	N/A	N/A	1%	21%	6%

Referred and closed.	14%	13%	12%	14%	20%
Closed – Concerns fully resolved.*	7%	3%	4%	4%	3%
Closed – Plan established.*	10%	11%	3%	4%	6%
Closed – Questions answered.*	20%	19%	25%	12%	26%
Findings Report to DPHHS Director*	2%	3%	3%	2%	3%
Open from previous year’s contacts.*	7%**	17%**	9%**	10%**	8%**
Pending review at end of year*	12%	3%	8%	6%	11%

\*A Request for Assistance was received from a citizen.

\*\*This data factors into the previous calendar year’s overall contact numbers.

The 2023 Legislature gave the Office of the Child and Family Ombudsman an additional duty to investigate. MCA 41-3-215 allows for the Office of the Child and Family Ombudsman to investigate whether a report made to the Montana Child Abuse Hotline was done with false or malicious intent. If the Office of the Child and Family Ombudsman finds this has occurred the office shall report the matter to the county attorney that has jurisdiction over the matter. The investigative duty began on July 1, 2023.

The Office of the Child and Family Ombudsman received two Request for Assistance forms in 2024 that suspected false or malicious intent in reporting suspected child and/or abuse. The Office of the Child and Family Ombudsman found that neither report was made in a false or malicious manner.



## **Duty: Share Findings**

### **2024 Findings Reports and Recommendations**

The Office of the Child and Family Ombudsman submitted ten *Findings Reports* to Child and Family Services. *Findings Reports* document case specific violations of law, policy and procedure and are sent to the Director of Department of Public Health and Human Services. The reports make recommendations to improve practices.

There was a total of 23 formal recommendations to Child and Family Services. Child and Family Services agreed with 82.6% of the recommendations and disagreed with 17.3%. MCA 41-3-1212 requires DPHHS to respond to all *Findings Reports and Recommendations* within 60 days. Child and Family Services complied within the required time for all ten reports.

All *Findings Reports* recommendations made to Child and Family Services and the written responses can be found in Appendix II of this report.

### **Child Fatalities**

Montana Code Annotated (MCA) 41-3-209 requires Child and Family Services to provide critical incident notifications to the Office of Child and Family Ombudsman, including child fatalities.

MCA 41-3-209 directs Child and Family Services to notify The Office of the Child and Family Ombudsman:

- 1) Within one business day: The death of a child who, within the last 12 months:
  - (a) had been the subject of a report of abuse or neglect;
  - (b) had been the subject of an investigation of alleged abuse or neglect;
  - (c) was in out-of-home care at the time of the child's death; or
  - (d) had received services from the department under a voluntary protective service agreement.

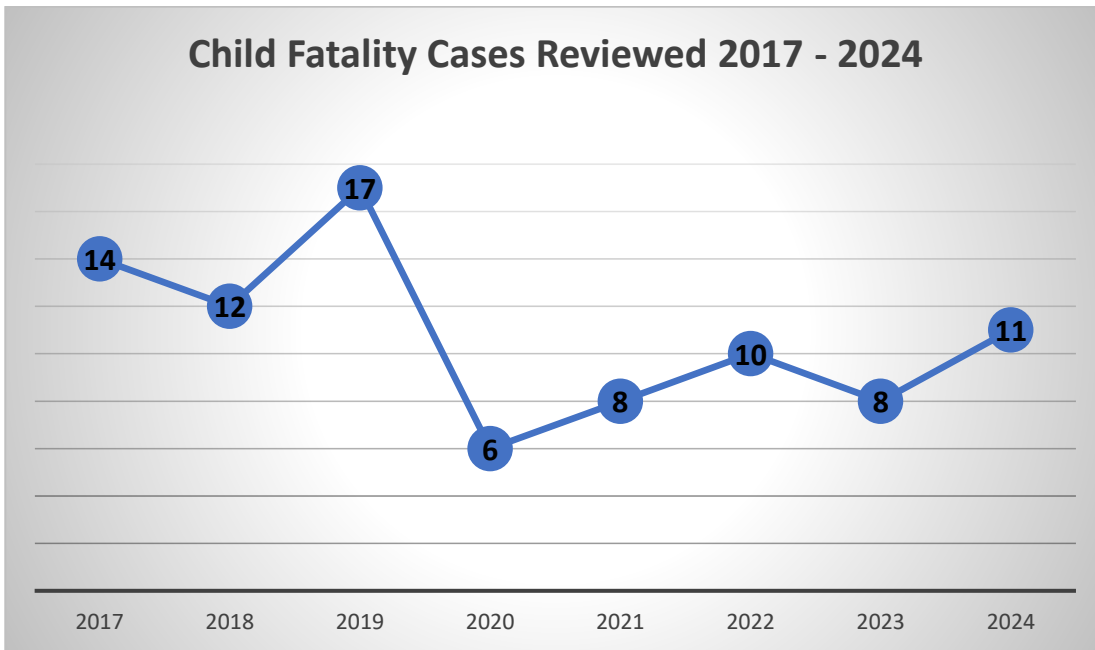
Eleven child fatalities qualified for review by the Office of the Child and Family Ombudsman in 2024.

### **Child Fatality Review Process**

Child and Family Services provides notification of a child fatality via email to the Office of the Child and Family Ombudsman. The Office of the Child and Family Ombudsman reviews all reported child fatalities. In every case, the Office of the Child and Family Ombudsman uses Child and Family Services electronic case management systems and/or requests all Child and Family Services documentation for each child and family member included in the report of the fatality. All documentation available in the case management systems or provided by Child and Family Services is reviewed. The Office of the Child and Family Ombudsman conducts an accurate and comprehensive case review for each child fatality, however the Office of the Child and Family Ombudsman authority is limited to review only Child and Family Services records and does not include all medical, law enforcement, criminal history, educational, mental health, medical examiner or coroner findings, or other sources of documentation about the deceased child or

his/her family. To provide a comprehensive, neutral review, the child fatality review team includes the Special Services Bureau staff from other related programs. Data points from each case were identified and recorded in the review process.

The Office of the Child and Family Ombudsman reviews are initiated separately from a criminal investigation. No actions are taken to interfere with a criminal or judicial process. The following sections summarize the Special Services Bureau Child Fatality Review Team’s findings.



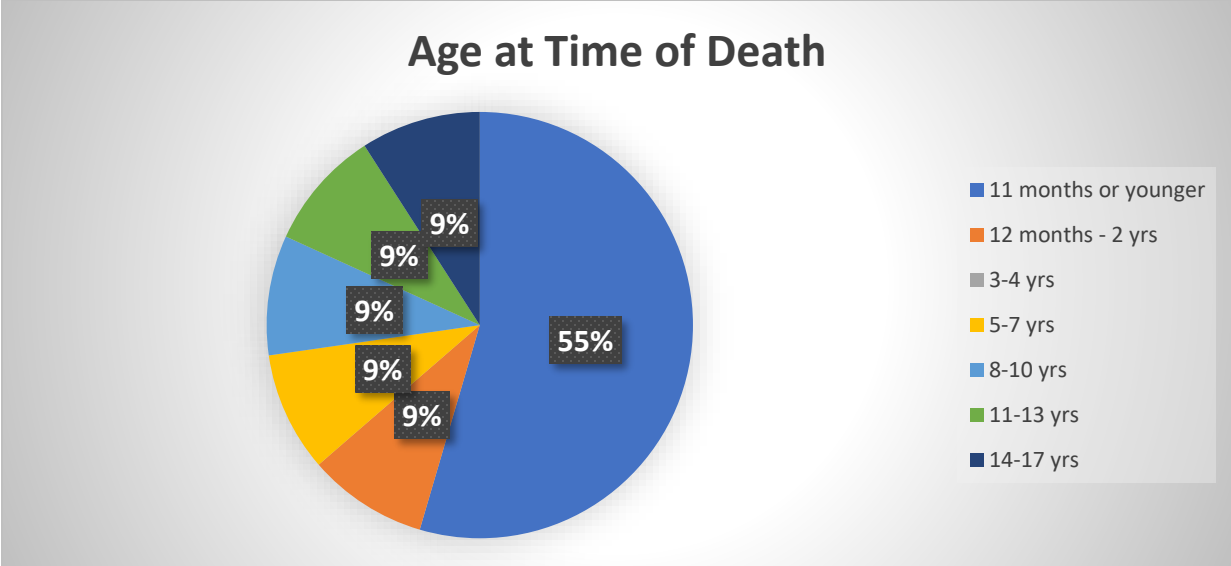
**Child Fatality Review Findings:**

**Finding 1: Age at Time of Death**

There were more fatalities involving children between the ages of 0 to 2 years old.

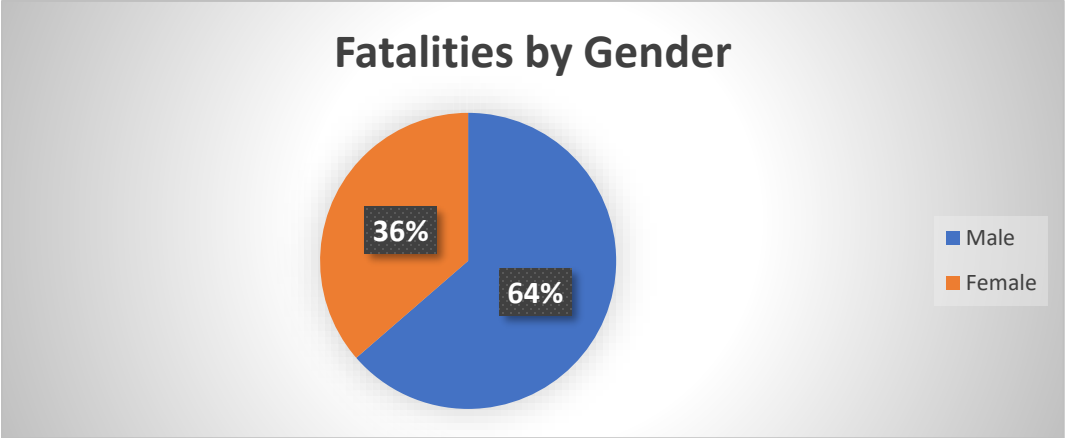
**Finding 2: Age Under One Year**

55% of the children were eleven months or younger on the date of the fatality.



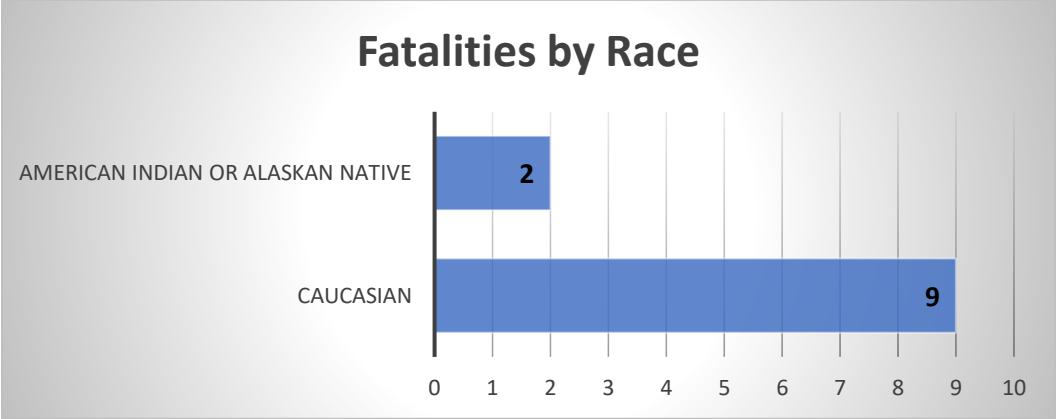
**Finding 3: Gender**

About two thirds of the fatalities were male children and about one third were female children.



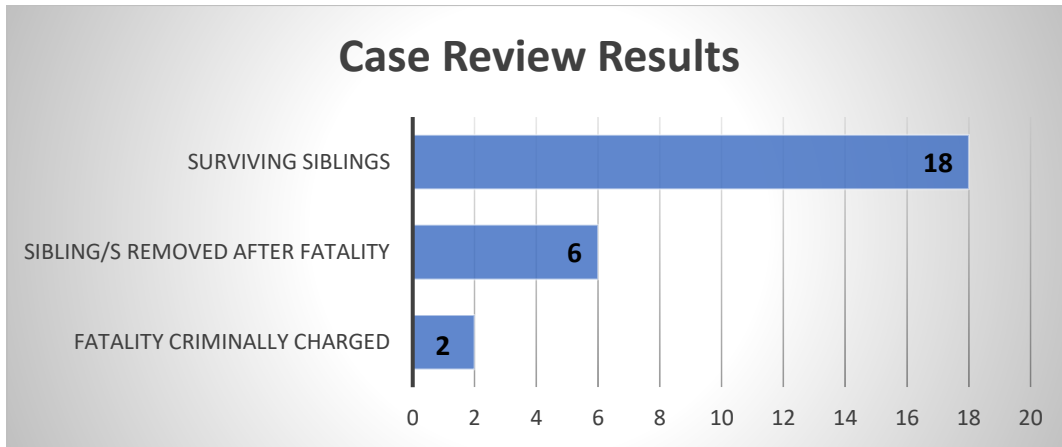
**Finding 4: Race**

Child and Family Services identified the race of each child.



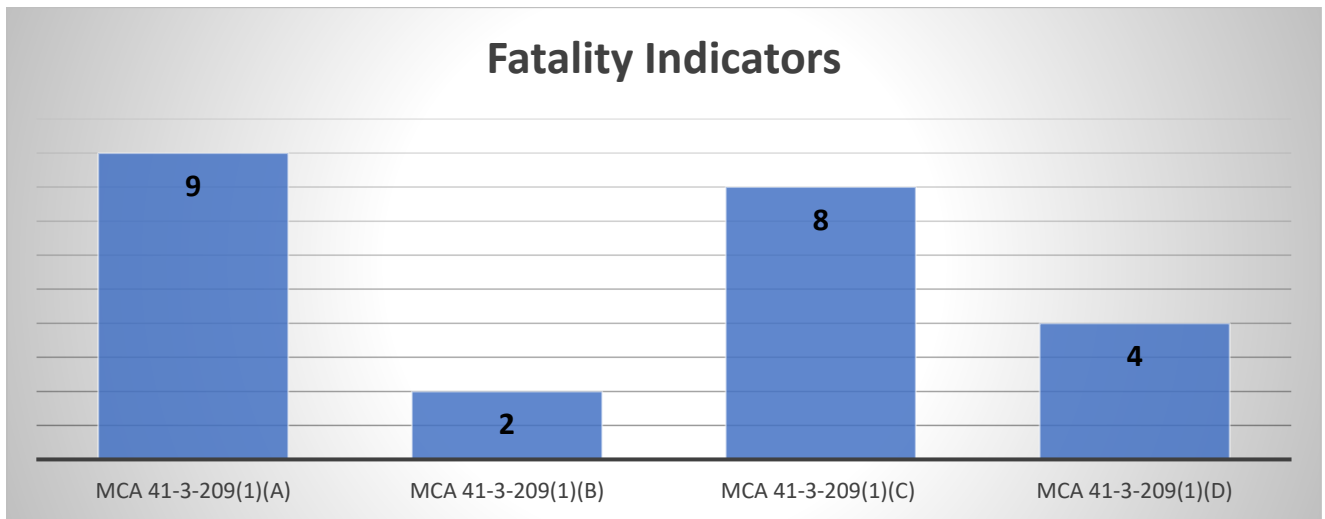
### Finding 5: Criminal Charges

For the 2024 fatalities, two of the fatalities resulted in criminal charges.



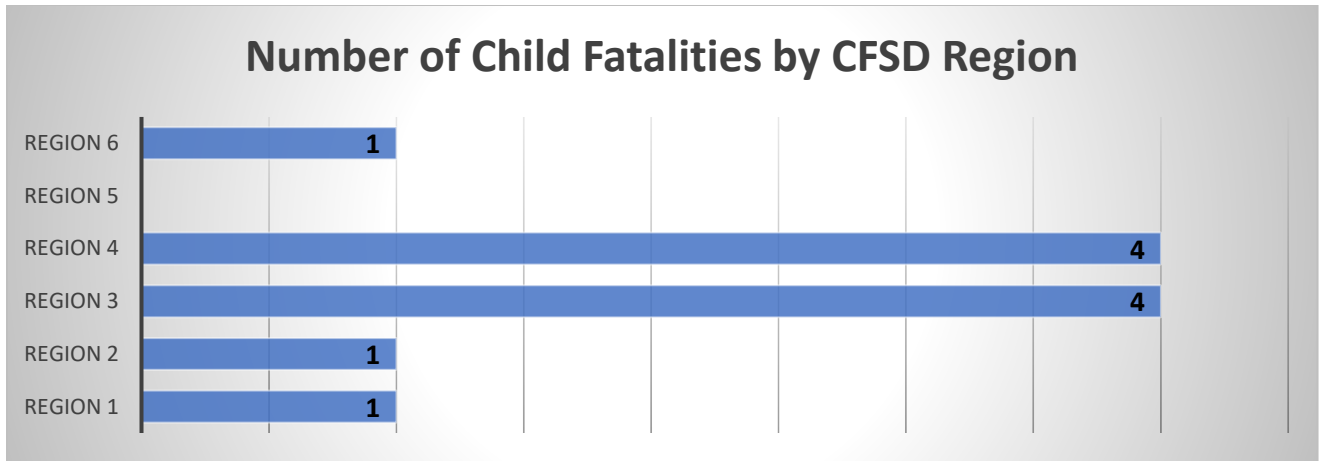
### Finding 6: MCA 41-3-209(1)

Please note a fatality may qualify under multiple MCA categories. The code can be found again on page eight of this report. A fatality may qualify under multiple indicators.



### Finding 7: Child and Family Services Regions

Child fatalities occurred in five of the six Child and Family Services regions.



### 2024 Notifications Data

Child fatalities are not the only statutorily required notification the Office of Child and Family Ombudsman receives from Child and Family Services. MCA 41-3-209 also directs Child and Family Services to notify the Office of Child and Family Ombudsman:

2) Within five business days:

- (a) any criminal act concerning the abuse or neglect of a child;
- (b) any critical incident, including, but not limited to, elopement, a suicide attempt, rape;
- (c) nonroutine hospitalizations, and neglect or abuse by a substitute care provider involving a child who is receiving services from the department pursuant to this chapter;
- (d) a third report received within the last 12 months about a child at risk of or who is suspected of being abused or neglected.

**Table 2: Notifications received by OCFO.**

Type of Notification	2020	2021	2022	2023	2024
Cross Reports	4,647	5,047	5,092	5,471	5,214
Missing Youth Reports	108	156	179	151	105
Other Critical Incidents	10	98	96	67	64

### Cross Reports:

Notifications received under 2) (a) or “any criminal act concerning the abuse or neglect of a child” are called *Cross Reports*. A Cross Report occurs when law enforcement makes a report to Child and Family Services Centralized Intake of suspected child abuse or when a Child and Family Services Centralized Intake Specialist reports a possible crime against a child to a local law enforcement agency. The Office of Child and Family Ombudsman receives an email for each Cross Report statewide. The Office of Child and Family Ombudsman received 5,214 Cross Reports in 2024.

- 3,312 Child and Family Services Centralized Intake reports to law enforcement jurisdictions.
- 1,902 law enforcement reports to Child and Family Services Centralized Intake.

### **Critical Incidents:**

**Missing Youth:** The Office of the Child and Family Ombudsman works closely with Child and Family Services and the Department of Justice Missing Persons Specialist to track any youth who is missing from an out-of-home placement, or who has been receiving services from Child and Family Services. The Department of Justice hosts a global email for reports of missing youth which assures that law enforcement is notified each time a youth is missing, and Child and Family Services also notifies the Department of Justice when the youth is located.

At the end of 2024 The Office of Child and Family Ombudsman, initiated a Memorandum of Understanding with Youth Court Services to begin attending the monthly Missing Youth meeting described in the June 2024 Systemic Report found [here](#). Youth Court Services staff will begin attending the meetings in early 2025.

In 2024 the Office of the Child and Family Ombudsman received 105 reports from Child and Family Services about a youth reported as missing. From this recorded data, the Office of the Child and Family Ombudsman found that there were some youths who were repeatedly reported as missing thus the 105 reports represent 95 individual youth. The Office of the Child and Family Ombudsman records each report as a separate event. It is important to understand that there are some youths who are recurrently reported missing throughout a month and year and that the numbers presented reflect that.

**Other Critical Incidents:** Notifications received under 2) (b) are called “Other Critical Incidents” in the table below. This category covers all other notifications received about a child in foster care. These notifications cover any situation that would not normally occur such as non-routine hospitalizations, injuries, suicide attempts or neglect or abuse by substitute caregivers. There were 64 Other Critical Incidents reported.

**Alerts:** Notifications received under 2) (c) are called “Alerts” by OCFO. OFCO receives an electronic notification each time a third report on a child is entered by Child and Family Services within a twelve-month period. This includes a new report to Child and Family Services and a new incident related to an open report. Alerts are received through MFSIS. A data analysis of Alerts revealed that the data is unreliable and inaccurate. Individual notifications of the third report on the same child are delivered inconsistently, with duplicates, and other conflicting information. Child and Family Services has been notified of the errors, however due to the number of case management issues identified in MFSIS related directly to field work, the cost of corrections, and the priority to direct resources efficiently, the Alerts will not be accurate.

### **Duty: Outreach and Education**

#### **General Outreach**

To ensure that citizens and stakeholders are made aware of the purpose, services, procedures, and contact information for the ombudsman, the Office of the Child and Family Ombudsman is statutorily mandated to offer outreach.

2024 Outreach included:

- Five statewide Child and Family Services field staff presentations
- Monthly “Meet the Ombudsman” webinars
- Site specific “Meet the Ombudsman” trainings at:
  - State of Montana: Office of Public Defender
  - Florence Crittendon
  - Helena YWCA
- Presentation to Montana Legal Services Association
- Attendance at four Child and Family Services State Advisory Council meetings
- Participating in the Justice for Montanans AmeriCorps Program
- The Montana Child Abuse and Neglect Conference
- The Children’s Justice Conference
- Montana Court Appointed Special Advocate (CASA) Conference
- Conference exhibitor:
  - Great Beginnings, Great Families Conference
  - Healthy Mothers, Healthy Babies Annual Conference

**Presentations included direct outreach to over 400 citizens.**

**Recommendations:**

The Office of Child and Family Ombudsman extends two recommendations to Child and Family Services.

**Recommendation 1:** Department of Public Health and Human Services direct Child and Family Services to train and regularly review MCA 41-3-209(1), the requirement to report child fatalities defined in this code to the Office of Child and Family Ombudsman, with all staff.

**Rationale 1:** When a child fatality is not reported within the one business day timeframe, the Child and Family Services Regional Administrator is notified and proper notification is provided immediately. The Office of Child and Family Ombudsman found that Child and Family Services staff may not know when to report a fatality to the Ombudsman office.

**Recommendation 2:** Department of Public Health and Human Services direct Child and Family Services to provide clear communication and documentation about the *Conditions for Return* to parents on a regular basis.

**Rationale 2:** In cases with legal action, requesters to the Office of Child and Family Ombudsman regularly expressed concern and confusion about how the *Conditions for Return* differ from the court ordered treatment plan for reunification of their family. During case reviews the Office of Child and Family Ombudsman found that Child and Family Services online case record did not consistently detail or update cases with current safety concerns. The case records accurately reflect

the initial reason for legal action, however as the case progresses the records may not accurately reflect regular ongoing safety assessments.

**Conclusion:**

The DOJ Special Services Bureau and the Office of the Child and Family Ombudsman recognize the impact case reviews and child fatalities have on citizens, communities, and professional stakeholders. Child abuse is a community problem; preventing and responding to child abuse requires strong collaboration among multiple agencies. We sincerely thank the Department of Public Health and Human Services for sharing information and considering recommendations for future system improvements. We extend our thanks to Attorney General Austin Knudsen, Division of Criminal Investigation Administrator Bryan Lockerby (retired), and DOJ staff for their unwavering support and commitment to improving Montana's child protection and child welfare systems to build a better future for all.



## Appendix I: Child and Family Regional Map

### CFSD Region Map

#### REGION VI

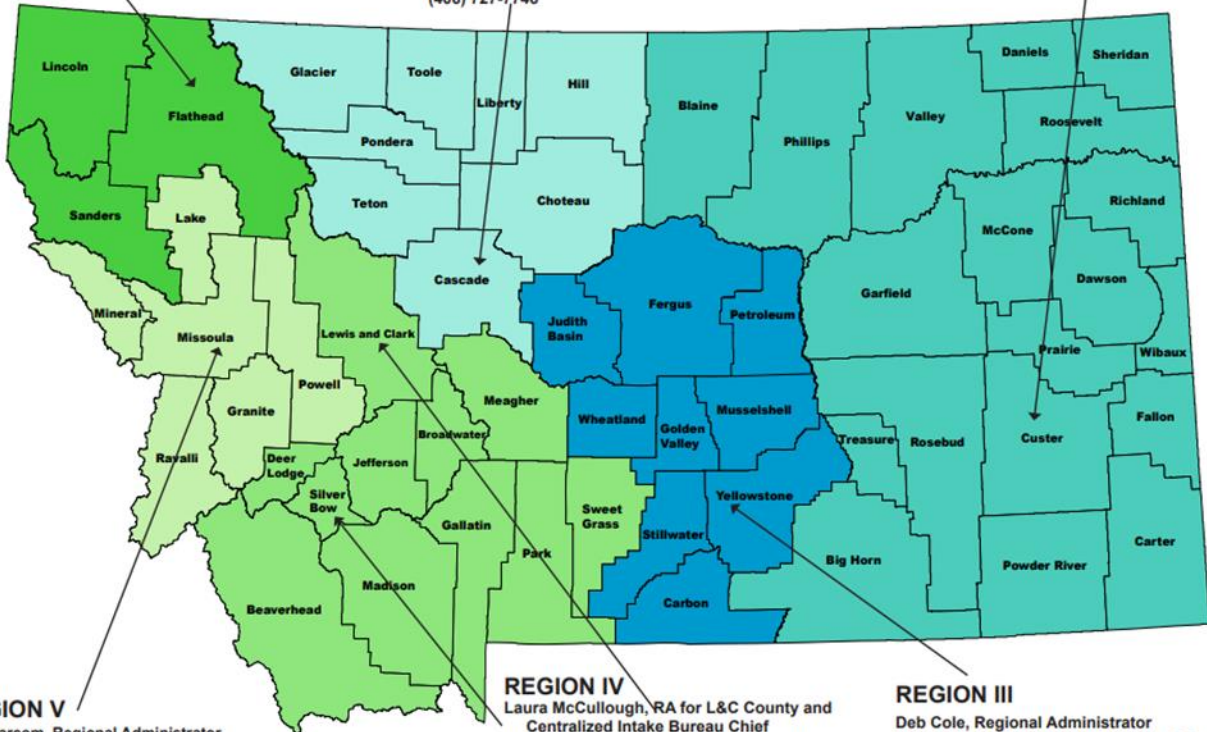
Jennifer Blodgett, Regional Administrator  
 Brandi Eaton, Admin Support Supervisor  
 121 Financial Dr. Ste. C  
 Kalispell, MT 59901  
 (406) 300-7418

#### REGION II

Sahrta Jones - Jesse, Regional Administrator  
 Megan Shine, Admin Support Supervisor 2300  
 12th Ave. S. #211  
 Great Falls, MT 59405  
 (406) 727-7746

#### REGION I

Eric Barnosky, Regional Administrator  
 Ginger Kiel, Admin Support Supervisor  
 706 Palmer / PO Box 880  
 Miles City, MT 59301  
 (406) 233-2340



#### REGION V

Kate Larcom, Regional Administrator  
 Brandi Eaton, Admin Support Supervisor  
 2677 Palmer, Ste. 300  
 Missoula, MT 59808  
 (406) 523-4100

#### REGION IV

Laura McCullough, RA for L&C County and  
 Centralized Intake Bureau Chief  
 Jennifer Hoerauf, Regional Administrator  
 Tracy Hawthorne, Admin Support Supervisor  
 700 Casey St.  
 Butte, MT 59701  
 (406) 496-4950

#### REGION III

Deb Cole, Regional Administrator  
 Shawn Smart Enemy, Admin Support Supervisor  
 Teresa Egelhoff, Admin Support Supervisor  
 2525 Fourth Ave. N. #309  
 Billings, MT 59101 (406)  
 657-3120

## **Appendix II: 2024 Recommendations from the Office of Child and Family Ombudsman to Child and Family Services Division**

The Office of the Child and Family Ombudsman’s statutory authority includes making case specific findings as well as recommendations to strengthen the system. Often the cases reviewed, and the findings determined, relate to specific actions of a worker and or higher-level administrator. While there is value in reporting back to the agency the areas of practice that were assessed during case reviews, it is the recommendations for overall case practice that stand to benefit the citizens of Montana. The Office of the Child and Family Ombudsman recommendations have directed the agency to clarify their policy and procedures for ease of use by field staff once they are working in the field.

Recommendations from the ten 2024 *Findings Reports* are listed in the order they were issued as written, apart from identifying information as to protect citizen confidentiality. Responses from Child and Family Services are below each recommendation.

There was a total of 23 formal recommendations to Child and Family Services. Child and Family Services agreed with 82.6% of the recommendations and disagreed with 17.4%. The responses which differ from the Office of Child and Family Ombudsman recommendation are in orange font and the responses that agree with the Office of the Child and Family Ombudsman recommendation are in blue font.

Child and Family Services has responded to each Office of the Child and Family Ombudsman recommendation from 2024 within the statutory 60-day timeline.

## 2024 Recommendations from OCFO to DPHHS

<p><b><u>Report 1:</u></b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Region 3 Administrator to review and train regional CPSS and CPS on the new Montana ICWA laws in the Montana Code Annotated.</p> <p>Although CFSD made efforts to involve the children’s Tribe in this case, the Region 3 Administrator will review and train regional CPS and CPSS on the new Montana ICWA laws on May 1, 2024.</p>
<p><b><u>Report 2:</u></b></p> <p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Licensing Bureau Chief to review and train RFSS and RFS on mandated reporting laws in the Montana Code Annotated and ARMs with foster and kinship families.</p> <p>CFSD always strives to be a culture of learning and continuous improvement. CFSD recognizes that the current resource family application and licensing process can be improved by including a training video that provides consistent guidance and explanation on mandatory reporting requirements. In the pursuit of this improvement, CFSD will include in the resource family licensing and acknowledgment process that the training video on mandatory reporting requirements be viewed by the resource family.</p> <p>2) DPHHS direct CFSD to review response times to Licensing Reports and consider adopting faster response times to reports.</p> <p>The current response time is 10 days. As of July 1, 2024, response time for licensing reports will be reduced to 5 days from the day the report is received at Centralized Intake. The Licensing Bureau Chief is currently laying the foundation for the change in response times and creating an implementation plan with leadership.</p>
<p><b><u>Report 3:</u></b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Region 4 Administrator to review and train regional CPSS and CPS on the Family Functioning Assessment Procedure regarding “face to face” contact with children when completing an Immediate Danger Assessment and uploading the Immediate Danger Assessment to the case management system within the timeframe outlined in the Family Functioning Assessment Procedure.</p> <p>Region 4 trained regional CPS and CPSS on the Family Functioning Assessment Procedure on June 10, 2024, at the Helena CFSD all staff meeting that occurs every Monday.</p>
<p><b><u>Report 4:</u></b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Region 5 Administrator to train regional CPSS and CPS to complete investigations with the statutory and procedural required 60 days.</p> <p>The Region 5 Administrator will train regional CPSS and CPS on completing investigations within the statutory and procedurally required 60-day timeframe on July 9 and July 16, 2024.</p>

<p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p>	<p>2) CFSD direct Region 5 Administrator to train regional CPSS and CPS to complete and send findings letters on all closed investigations within the procedural timeframe.  The Region 5 Administrator will train regional CPSS and CPS on completing and sending findings letters on all closed investigations within the procedural timeframe on July 9 and July 16, 2024.</p> <p>3) DPHHS direct CFSD to align procedures “Family Functioning Assessment” and “Investigative Finding and Determination.” The “Family Functioning Assessment” gives CFSD 30 calendar days while the “Investigative Finding and Determination” procedure gives CFSD 10 calendar days to provide findings letters to parents/caregivers once an investigation has been closed.  CFSD will align the Family Functioning Assessment Procedure and the Investigation Finding and Determination Procedure with a 30-calendar day deadline for sending findings letters by July 31, 2024.</p>
<p><b>Report 5:</b></p> <p><b>DPHHS Response:</b></p>	<p>1) DPHHS direct CFSD to develop a procedure directing how information pursuant to ARM 37.95.176(2) and ARM 37.47.614(2) is consistently shared between interdepartmental divisions.  When an employer-requested DPHHS background check is sent to CCL, CCL accesses only those CFSD records that inform CCL of any child abuse or neglect case determinations as they relate to a child care facility employee or candidate. Because CCL’s purpose for accessing CFSD records is narrow, there is no reason to develop an ongoing and reciprocal policy regarding inter-divisional information sharing.</p>
<p><b>Report 6:</b></p> <p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Region 3 staff to provide the current resource parent(s) a completed copy of the “Information on Child for Placement Purposes (CFS-206)” regarding youth #490510.  On July 31, 2024, the “Information on Child for Placement Purposes (CFS-206)” was reviewed with the current resource parents.</p> <p>2) CFSD direct Region 3 Administrator to train regional CPS and CPSS on providing the form “Information on Child for Placement Purposes (CFS-206)” to resource parents and/or licensed facilities whenever a child is placed in their care.  <i>Resource Parents:</i> The Region 3 Administrator will train regional CPS and CPSS on providing the form “Information on Child for Placement Purposes (CFS-206)” to resource parents whenever a child is placed in their care on September 4th, 2024.  <i>Licensed Facilities:</i> When a child is being considered for placement in a licensed facility, the CFSD Placement Procedure states the CPS will “contact the facility to determine the referral process” and “complete the referral and provide the necessary documents to the home or facility.” Licensed facilities may include a Psychiatric Residential Treatment Facility (PRTF), Therapeutic Group Home (TGH), daycare, youth shelter, acute psychiatric hospital, juvenile detention center, or juvenile correctional facility. Each of these different licensed facilities may have</p>

	<p>slightly different requests for information depending on the type of licensure, current milieu, scope and focus of clinical interventions and supports provided by the facility, or other factors. The information requested by licensed facilities varies but can include clinical documentation of mental and behavioral health diagnoses, physical health needs, educational records, medications, a list of recent behaviors, and other information as requested by any specific licensed facility.</p> <p>The sum of information requested by, and provided to, licensed facilities during the referral process includes all the information that is required on the “Information on Child for Placement Purposes (CFS-206)” form, but also includes substantially more child-specific information. The Placement Procedure currently requires that the CPS also send the “Information on Child for Placement Purposes (CFS-206)” form to licensed facilities, which requires the CPS to allocate time and resources to take information that is already included in the documentation provided to licensed facilities during the referral process and input it into the CFS-206 form.</p> <p>Accordingly, because a licensed facility would already have the information through the individual facility application packet, CFSD will update the Placement Procedure by October 31, 2024, to clarify that the “Information on Child for Placement Purposes (CFS-206)” form is not necessary to send to licensed facilities during the referral process or upon placement.</p>
<p><b><u>Report 7:</u></b></p> <p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p>	<ol style="list-style-type: none"> <li>1) CFSD direct Region 4 Administrator to train regional CPS and CPSS to complete the required safety management plans for children when impending dangers are identified. Region 4 (Helena) was trained on the safety management plans and impending dangers on September 23, 2024.</li> <li>2) CFSD direct Region 4 staff to develop and implement a case plan for CAPS # 643607 and 657861. CFSD filed a Petition for Dismissal in the case involving child #657861, and that case was dismissed on July 17, 2024. As mentioned above in the response to Finding #2, CFSD is currently piloting the implementation of a Family Case Plan that will serve as the comprehensive “case plan” document in each child’s case. As part of that pilot, Family Case Plan was developed for child #632607 on August 22, 2024.</li> <li>3) CFSD direct Region 4 Administrator will train Helena CPSS and CPS on including specific aspects of the assessment that need to be investigated in an affidavit requesting Temporary Investigative Authority. MCA 41-3-433 addresses Temporary Investigative Authority (TIA), and states “The department may petition the court for authorization to conduct an investigation into allegations of child abuse, neglect, or abandonment when necessary. An order for temporary investigative authority may not be issued for a period longer than 90 days.” To create maximum transparency for families served by CFSD, the elements of the Legal Intervention Pre-Adjudication Procedure referenced in the above findings</li> </ol>





<p><b>DPHHS Response:</b></p>	<p>in collaboration with their direct supervisor that consists of four training phases and an additional component that is ongoing through the first year of employment. As part of these comprehensive onboarding and training requirements, CPS staff are trained on the definition and requirements of being a mandatory reporter of child abuse and neglect as well as when and how to contact the Child Abuse Hotline during their routine job duties. CPS staff additionally trained on the National Association of Social Workers (NASW) Code of Ethics, including professional obligations and ethical responsibilities.</p> <p>Division Administrator will review the importance of mandatory reporting by CFSD staff at the statewide supervisor meeting on January 21, 2025.</p> <p>2) DPHHS direct Region 4 Administrator to train Centralized Intake staff and supervisors on cross reporting alleged domestic violence incidents to the appropriate local law enforcement jurisdiction and OCFO.</p> <p>CFSD is statutorily required by MCA 41-3-205 to cross report specific events to “an appropriate individual described in subsection (5)(a)” (the Attorney General, a county attorney or deputy county attorney for the location where the abuse occurred, a peace officer, or OCFO) or to a county or regional interdisciplinary child information and school safety team. MCA 41-3-209 requires CFSD to cross report specific events to the OCFO. As explained in the response to #2 above, MCA 41-3-205 does not provide sufficient language to determine the circumstances in which the OCFO is an appropriate entity to whom to report. In the absence of sufficient statutory guidance in MCA 41-3-205, CFSD defers to MCA 41-3-209 to determine when OCFO would be an appropriate individual to whom cross reporting must occur. The Region 4 Administrator will train Centralized Intake staff and supervisors on the cross reporting required by MCA 41-3-205 and MCA 41-3-209 on January 8, 2025.</p> <p>3) CFSD direct Region 6 CFSD staff to provide a referral to a Family Support Team meeting within 72 hours of a prevention plan being implemented to provide the opportunity for referrals to be made to specific community service providers.</p>
<p><b>DPHHS Response:</b></p>	<p>Region 6 CFSD staff were trained on the FST Procedure, including providing a referral for a FST meeting within 72 hours of a Prevention Plan being implemented, on July 8, 2024, and November 12, 2024.</p> <p>4) CFSD direct Region 6 CFSD staff to revise and resend the findings determination letter against the birthmother in R/R 603298 to describe actions made by the birthmother.</p>
<p><b>DPHHS Response:</b></p>	<p>The findings determination letter was revised and resent on November 1, 2024.</p> <p>5) DPHHS direct CFSD to develop guiding practices or procedures around safety assessments and case planning with families involved with domestic violence.</p>
<p><b>DPHHS Response:</b></p>	<p>All safety assessments and case planning activities completed by CFSD are intended to be individualized and address the unique circumstances of each family. The statutes and procedures referenced throughout this</p>

	<p>response determine and influence the engagement and multi-disciplinary approach CFSD uses when working with families and stakeholders, including law enforcement agencies and domestic violence service providers. Creating additional guiding practices or procedures specific to one element of any given investigation is duplicative of the individualized, family-centered approach to engagement and assessment already in place. Pursuant to MCA 41-3-130, a new requirement from the 2021 legislative session, all staff hired into child-facing positions complete a child welfare certification and training program and pass a competency examination as part of the requirements of employment. Pursuant to MCA 41-3-129, certified Child Protection Specialists (CPS) must also complete twenty hours of continuing education annually consisting of topics approved by CFSD. The topics approved in the onboarding and ongoing training and education requirements are outlined in statute and/or approved by CFSD and both introduce and reinforce the family-centered practices and procedures CFSD follows with every family. CFSD collaborates with external stakeholders and community partners, including domestic violence shelters and service providers, to provide ongoing training at local unit meetings, regional all-staff trainings, and statewide supervisor’s meetings. CFSD always strives to be a culture of learning and continuous improvement. In the interest of maintaining this culture, CFSD will continue to collaborate with external stakeholders and community partners (including domestic violence shelters and service providers) to provide timely and effective supports and services to children and families.</p>
<p><b><u>Report 10:</u></b></p> <p><b>DPHHS Response:</b></p> <p><b>DPHHS Response:</b></p>	<p>1) CFSD direct Region 3 Administrator to train regional CPS and CPSS on providing specific details regarding immediate or apparent danger of harm on the IDA form.  The Region 3 Administrator trained regional CPS and CPSS on providing specific details regarding immediate or apparent danger of harm at a regional all-staff meeting on December 4, 2024. Region 3 also has a meeting with all CPSS each week and provided additional training to all CPSS at the weekly supervisor’s meeting on December 4, 2024.</p> <p>2) DPHHS direct CFSD to align the Immediate Danger Assessment (IDA) form and the SAMS Field Guide regarding whether the safety threat “child is 0-6 of age” is a standalone safety threat.  The safety threat “child is 0-6 years of age” is not included in the current version of the SAMS Field guide as a safety threat. The SAMS Field Guide includes and defines safety threats that sufficiently account for a child’s vulnerability due to age, cognitive, or developmental factors, such as “child is unable to protect self” and “child is unsupervised or alone for extended periods of time.”  CFSD will update the IDA form by removing “child is 0-6 years of age” to accurately align with the SAMS Field Guide by January 15, 2025.</p>