

# SDM® SAFETY ASSESSMENT FOR CONGREGATE CARE SETTINGS

## PRE-IMPLEMENTATION CHECKLIST

### BACKGROUND

When abuse or neglect is alleged while a child is in out-of-home care, including in congregate care settings, California child welfare agencies are required to evaluate whether an in-person child welfare services (CWS) response is needed. State policy directs that the child welfare agency investigates allegations of harm in care to ensure the immediate safety of children/youth in placement, regardless of whether an agency such as the Community Care Licensing Division is investigating the same allegation.<sup>1</sup>

To support agency workers in making accurate, consistent, and equitable decisions about a youth's immediate safety, the Structured Decision Making® (SDM) safety assessment has been updated to include the SDM® safety assessment for congregate care. This assessment supports child welfare and probation staff responsible for investigating allegations in congregate care settings.

The SDM safety assessment updates for use in congregate care were developed through a collaborative workgroup process following an extensive discovery period. After the initial workgroup, the assessment was distributed for stakeholder review and feedback. The assessment was tested for inter-rater reliability in February 2023 and piloted in select counties from February 1 to May 31, 2023. Testing and pilot feedback was gathered and used to inform final changes to the assessment. The assessment development involved a diverse group of participants, including individuals with lived experience, tribal representatives, California Department of Social Services (CDSS) staff, an array of county staff, and subject-matter experts. **This assessment will be implemented statewide on January 2, 2024.**

All counties in California, regardless of pilot participation, are expected to implement the updated SDM safety assessment for use in congregate care, as guided by state policy.<sup>2</sup> Local agencies should review the checklist below to ensure readiness to implement the updated SDM safety assessment for

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<sup>1</sup> California Code of Regulations. CCR 11 § 930.52 (1991); California Department of Social Services. (2005). Reporting and investigation requirements for child abuse allegations regarding children in out-of-home placements (ACL No. 05-09).

<sup>2</sup> MPP 31-002: (s)(1); ACL 05-09; ACL 20-142; forthcoming ACL.

congregate care and are encouraged to reach out to CDSS or Evident Change as soon as possible with any questions or concerns.

## **LOCAL IMPLEMENTATION CHECKLIST**

### **☐ Step 1: Reach out to other county representatives to internally coordinate roles for training and communication.**

Each county should identify a lead contact or small steering team to support local implementation of the updated SDM safety assessment for use in congregate care. Local leadership should ensure that all program managers, supervisors, and staff responsible for investigations in out-of-home care know about the upcoming changes and have a plan for accessing necessary statewide trainings on the updated assessment.

### **☐ Step 2: Ensure local agency policy and practice align with state requirements for assessing investigations in licensed settings.**

Review of local policy should be completed prior to statewide implementation of this assessment to ensure any conflicts or misalignment between state and local policy are flagged for resolution. Evident Change's [Congregate Care Policy Scan](#) lists existing state policy and regulations related to investigations in congregate care settings. The scan can support local policy alignment pending release of the state's forthcoming all county letter (ACL).

Please note that while CWS and Licensing each have distinct roles, responsibilities, and timeframes in these investigations,<sup>3</sup> a joint investigation is considered best practice for minimizing trauma. Consider planning local policy or protocol in collaboration with community care licensing (CCL).

### **☐ Step 3: Review local data and create a continuous quality improvement plan.**

Agencies should review local data to understand current practice and develop a plan for monitoring implementation.

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<sup>3</sup> CCR Title 11, Section 930.52, ACL 05-09.

## Review data on local evaluate-out rates and current practice for screening allegations in congregate care.

State policy clarifies that it is not appropriate for a referral of abuse or neglect that requires an immediate response or an in-person investigation to be evaluated out to CCL on the basis of placement setting alone. The CWS agency should not determine or delay its response based on the licensing authority.<sup>4</sup>

Yet, an analysis of CWS/CMS data showed in fiscal year (FY) 2020–21, 18 counties evaluated out 90% or more of all referrals alleging maltreatment in congregate care settings.<sup>5</sup> Counties are encouraged to review local evaluate-out rates specific to allegations in congregate care and ensure hotline workers are familiar with state policy and the expected process for documenting perpetrator type and facility information in CWS/CMS.<sup>6</sup>

## Set local benchmarks to guide implementation.

Evident Change recommends developing a set of local benchmarks to guide implementation and ensuring regular review of data related to the completion of the updated SDM safety assessment for use in congregate care, particularly over the first year.

SafeMeasures® Completion Reports will be available to support a data-informed implementation of the assessment after it goes live statewide. Additional ad hoc reporting through Evident Change may also be available.

PROGRAM AREA	SAFEMEASURES REPORTS	60-DAY GOAL	SIX-MONTH GOAL	ONE-YEAR GOAL
Investigations: OHC	SDM Safety Assessment Completion for Substitute Care Providers	__ % completion	__ % completion	__ % completion
	SDM Safety Assessment Completion for Congregate Care	__ % completion	__ % completion	__ % completion

If you have questions related to implementation, please reach out to Mackenzie Rutherford at [mrutherford@evidentchange.org](mailto:mrutherford@evidentchange.org), Claire Crowley at [ccrowley@evidentchange.org](mailto:ccrowley@evidentchange.org), or Adele Carlson or Julie Waters at [childprotection@dss.ca.gov](mailto:childprotection@dss.ca.gov).

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<sup>4</sup> California Department of Social Services, *Reporting and investigation requirements for child abuse allegations regarding children in out-of-home placements (ACL No. 05-09)*.

<sup>5</sup> See [Congregate Care Discovery Findings](#), Slide 16–19.

<sup>6</sup> See [Congregate Care Discovery Findings](#), Slide 22–25; [Congregate Care Discovery Findings Memo](#), 2022.