

**Cuyahoga County Division of Children and Family Services
(CCDCFS)
Policy Statement**

Policy Chapter: Management
Policy Number: 10.07.02
Policy Name: Agency Policy and Procedure Development

Original Effective Date: 12/15/1994
Review Date(s): 10/01/2014, 05/01/2013, 08/10/2010, 08/06/2008
Current Revision Date: 06/01/2022
Approved By: Cynthia G. Weiskittel

PHILOSOPHY

CCDCFS recognizes that its mission statement, *To assure that all children are protected and nurtured within a family and with the support of the community as we strive to end the over-representation of people of color in the child welfare system*, mirrors our agency's commitment and continual effort in addressing ways to help reduce disproportionalities and disparities among our most vulnerable populations.

We believe advancing equity and inclusion is critical in achieving child safety, permanency and well-being outcomes and thereby rely on best practice principles and strategies to help identify and foster equitable solutions. Racial Equity Impact Assessment (REIA) tools are utilized in reviewing agency policies, practices, and decision-making processes to help identify any systemic barriers/gaps or biases that may perpetuate inequities.

Building and engaging community collaborative partners and other key stakeholders from public/private sectors remain a priority for ensuring appropriate resources, opportunities and supports are available and accessible to all children, youth, and families; especially to those who often experience social challenges and inequities, such as, people of color; LGBTQ+; gender nonconforming; and expectant and parenting teens. Furthermore, by analyzing and monitoring child welfare data on local and national levels helps us maintain a sense of vigilance and focus on child/family performance measures and outcomes and, thereby, allows opportunity for incorporating practice improvements that enable families to succeed.

An in-depth summary of CCDCFS policy and procedure guidelines and process flow are outlined in the proceeding text and subsequent pages.

PURPOSE: To establish guidelines for the development, review, and revision of agency policies and procedures and the maintenance of an agency policy and procedures manual for the day-to-day operations of the Cuyahoga County Division of Children and Family Services (CCDCFS).

SCOPE: This policy applies to all Cuyahoga County Division of Children and Family Services (CCDCFS) staff.

Definitions

Policy: A written statement of guiding principles, values, or intent that provides a basis for consistent decision making and guides the actions of staff. A policy is intentionally broad in its language and application.

Procedure: An outline of written instructions that provide steps for performing a task(s) or operationalizing an administrative or service delivery process. A procedure can be written as step-by-step instructions or as a narrative description of a process.

Policy Owner: A person with overarching responsibility for ensuring procedures within their respective division are reviewed and updated on a rotational schedule or as directed.

POLICY

I. General Guidelines

- A. CCDCFS maintains a Policy and Procedures Manual with policies governing the general administration and day-to-day operations of the agency and basic agency services and practice. All CCDCFS policies and procedures comply with all current legal and regulatory requirements, and child welfare standards and practices.
- B. CCDCFS has established procedures for the development and approval of new policies, the revision or deletion of outdated policies, and the timely review of all policies governing the agency.
- C. CCDCFS maintains a Policy Review Group (PRG). PRG's purpose is to assist the agency in maintaining the agency's policy and procedure manual by ensuring proposed new policies and/or revisions comply with child welfare standards and meet legal and regulatory requirements. Membership includes representatives from each Deputy Director's area: Program Administrators, Senior Supervisors, Supervisors, Social Services Workers and Case Review Facilitators. Members serve on the committee for at least one year. The chairperson/co-chair is generally expected to serve for a minimum of one year, but no more than three years, unless circumstances prevent continuation or CCDCFS' Senior Leadership requests new appointments.
- D. PRG reviews all new policies and existing policies that impact direct services and resource services delivery, or other policies requested by PRG. PRG is kept apprised of all current policies as they are due for triennial review and if needed, offer suggestions as agreed upon by the Group. All new/revised policies are reviewed for content and format by PRG and shared feedback is disseminated via PRG's Policy Review Form. If requested, PRG reviews any policy revisions made on behalf of prior recommendations. PRG shall invite the policy owner to a PRG meeting for continued dialogue, as needed.
- E. The Performance Evaluation and Innovation (PEI) designee ensures triennial reviews of existing policies are conducted.

PROCEDURES

I. Policy Development and Revision

- A. Policies are endorsed by CCDCFS Senior Leadership Team; developed, updated and reviewed on a triennial basis and maintained by PEI and PRG.
- B. A new/revised policy may be necessary when:
 - 1. Process improvements are needed or identified;
 - 2. Agency practice and/or Ohio Revised Code (ORC) and Ohio Administrative Code (OAC) require the development of a new policy;
 - 3. A current policy no longer reflects the current CCDCFS practice and / or ORC and OAC;
 - 4. A current/existing policy is scheduled for triennial (3-year) review;
 - 5. A staff member submits a request for a new/revised policy.
- C. If the Division Administrator or Deputy Director determines a new policy or revision is necessary, either one:
 - 1. Notifies or assigns a policy owner to draft a new policy or revise an existing one as consideration is given to appoint subject matter expert(s) (SME) or active individual(s) who served on committee(s) relevant to the topic.
 - 2. Emails PRG chairperson and PEI CFS Administrator regarding the new policy or revision being drafted, including those appointed to complete the work, and a target date for completion.
- D. If, however, a policy is due for triennial review, the PEI designee notifies the policy owner 90 days prior to the policy review due date.
- E. The assigned policy owner shall organize a workgroup or establish input from other internal/external stakeholders to ensure drafted policy reflects DCFS mission, vision and value statements and comply with all current legal and regulatory requirements.
- F. The new/revised policy is drafted using the CCDCFS Policy Statement template (accessible via CCDCFS agency intranet Forms section) or, if preferred, policy owner may submit the document to PEI's designee to verify if the content is relevant; reflects active voice language; and properly formatted, prior to PRG and management review.
- G. When completed, an electronic copy of the new/revised drafted policy, requested by Division Administrator or Deputy Director is submitted to PEI designee for circulation to PRG and Senior Managers for review and feedback. However, policies revised/updated as a result of triennial reviews are electronically submitted to PEI designee within 55-60 days of 90-day review period, and forwarded to PRG and Senior Managers for comment. Upon comment completion, PEI designee compiles and submits all feedback to policy owner for consideration.

- H. Policy owner reviews recommendation and consults with internal/external stakeholders, if necessary; makes appropriate changes and resubmits final revisions within 75 days of 90-day triennial review period to PEI designee who notifies, via email, CCDCFS Director and Deputy Directors of policy due for Senior Leadership's review and approval within a 10-calendar day timeframe.
- I. If CCDCFS Director and Deputy Directors determine additional revisions are needed, PEI designee informs policy owner and PEI CFS Administrator, and appropriate changes are made and resubmitted for secondary review and approval; however, if Senior Leadership Team decides the policy is acceptable, PEI designee submits final copy for Director's signature approval.
- J. If no revision is necessary, upon approval of the Deputy Director, the review date is noted on the policy and PEI designee submits a hardcopy of the policy statement to the Director for review and signature approval; posts the document via Cuyahoga County WEBISC and informs staff via email of the reviewed policy. PEI maintains and secures the policy's original signed copy.
- K. Within one (1) business day of the posted policy, the PEI designee informs all staff, via email, of the new/revised policy. A hyperlink is inserted in the email for each policy so staff can directly access the information. The email states: *"It is the responsibility of all staff to read, understand, and adhere to all CCDCFS policies. By opening this email, you have acknowledged receipt of the above policy(s) and accept responsibility for knowledge of its content. Should you have any questions about this, or any, CCDCFS policy, please contact and discuss with your immediate supervisor."*
- L. All agency managers ensure review of relevant procedures with their staff. The PEI designee provides each department area with a list of new and revised policies approved and posted during the previous month. This list is provided by the fifth business day of the month. All agency managers determine which policy(s) are relevant to their staff and provide a Policy Review Sheet for those policies. Upon receipt of an all staff broadcast email, managers ensure policies are reviewed by staff no later than 60 days after the effective date of the policy. Managers obtain acknowledgment of review of policies by obtaining staff signatures on a Policy Review Sheet following the review.

II. Practice Memos

- A. The Director and/or Deputy Directors issues practice memos, as needed, to communicate a procedure update or to clarify practice.
- B. If there is an existing practice memo which supersedes a current policy, the PEI designee posts the practice memo within one (1) business day of the Director and/or Deputy Directors' approval and informs staff via email of the new release. A hyperlink is inserted in the email for each practice memo so staff can directly access the information. The email messages states:

“It is the responsibility of all staff to read, understand, and adhere to all CCDCFS practice memos. Should you have any questions about this, or any, CCDCFS memo, please contact and discuss with your immediate supervisor.”

- C. The Deputy Director(s), whose area is affected by the memo, determines if and when the related policy is to be revised to reflect the practice memo.
- D. PRG reviews practice memos on an annual basis according by the issued date and recommends to Deputy Directors whether memo should be:
 - 1. remain posted;
 - 2. deleted/obsoleted; or
 - 3. incorporated into an existing or new policy.

III. Deletion/Obsolescence of Existing Policies or Practice Memos

- A. PRG recommends the deletion or obsolescence of a policy or practice memo when:
 - 1. Policy or practice memo no longer reflects CCDCFS practice and/or ORC & OAC rules and regulations;
 - 2. Pertinent information is housed within another policy;
 - 3. Policy or practice memo is requested for deletion by either the policy owner or PRG. It is a policy owner’s responsibility to notify PRG when a policy is no longer relevant to practice.
- B. After PRG reviews the policy or practice memo, recommendations are made to the policy owner and the deputy directors.
- C. Once a policy or practice memo is approved for deletion/obsolescence by the Director or Deputy Director, all staff are made aware by means of:
 - 1. A broadcast email message which includes a rationale statement on why the procedure is being deleted;
 - 2. DCFS’ News You Can Use (NYCU) monthly newsletter.

SEE ALSO:

CCDCFS Guidance for Policy Development and Review
CCDCFS Policy Development and Review Flowchart

FORMS

Location: DCFS Intranet

CCDCFS Policy and Procedure Template
CCDCFS Policy Review Group Form
CCDCFS Policy Review Sheet

CCDCFS Guidance for Policy Development and Review

Review and Consider:

- Existing agency policy, forms, tip sheets, etc.
- Relevant OAC and ORC
- Technical assistance from ODJFS
- REIA questionnaire tool for processing PRG's input/feedback
- Current literature and information resources on child welfare and related topics
- Potential effects on racial equity and disparity of all groups to ensure policy adheres in compliance with civil rights requirements and does not promote or encourage discrimination in the delivery of service by CCDCFS on basis of race, color, national origin, disability, age, sex, gender expression or religion
- Potential impact and challenges with implementing the policy at all levels

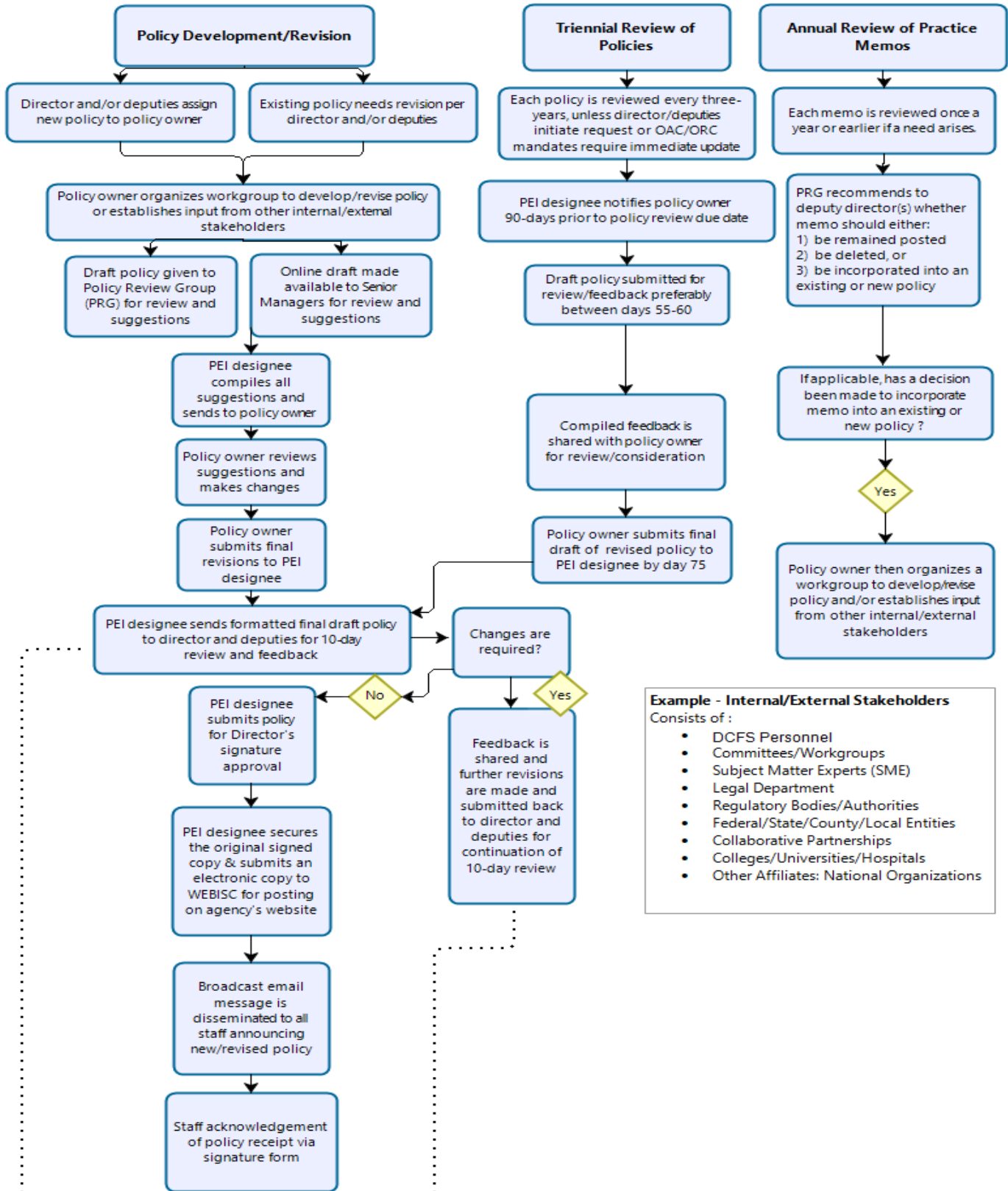
Partner with:

- Key internal/external stakeholders, such as, director, deputy director, senior managers, supervisors, affected staff, and community partners consisting of collaboratives, colleges/universities/hospitals, regulatory bodies/authorities, federal/state/local entities and other affiliates/national organizations
- Subject Matter Experts (SME)
- Legal Department
- Performance Evaluation and Innovation (PEI)
- Policy Review Group (PRG)

Considerations for Implementation:

- Has involvement and buy-in from key stakeholders been achieved?
- Is there a need for a presentation or training?
- Is coaching or other support needed?
- Is communication with partner agencies needed?
- How will performance be measured?

CCDCFS POLICY DEVELOPMENT AND REVIEW FLOWCHART



- Example - Internal/External Stakeholders**
 Consists of :
- DCFS Personnel
 - Committees/Workgroups
 - Subject Matter Experts (SME)
 - Legal Department
 - Regulatory Bodies/Authorities
 - Federal/State/County/Local Entities
 - Collaborative Partnerships
 - Colleges/Universities/Hospitals
 - Other Affiliates: National Organizations