

Safeguarding Children in Texas Foster Care

Key Issues in Policy and Practice and Recommendations to
Improve Child Safety in Foster Care





Safeguarding Children in Texas Foster Care

Key Issues in Policy and Practice and Recommendations to Improve Child Safety in Foster Care

April 2014

Ashley R. Harris, Child Welfare Policy Associate
aharris@txchildren.org, 512.473.2274

Executive Summary

In Texas, there has been a dramatic increase in the number of children dying in foster care due to abuse and neglect. These tragedies are preventable. Children in foster care deserve to be protected from further maltreatment and placed in settings where they are safe and can thrive for a lifetime.

Even one child's death is a devastating reflection of holes in our child welfare system. When children are removed from their home due to abuse and neglect, our state's child protection system is conveying to parents that their child is safer in the care, custody, and control of the Department of Family and Protective Services (DFPS) than in the child's own home. Yet, in fiscal year 2013, ten kids in the custody of DFPS' Child Protective Services (CPS) died as a result of abuse and neglect, compared to two child deaths in the previous fiscal year.

Historically, chronic underfunding has plagued the Texas child welfare system. Caseloads have consistently been unmanageable, far exceeding the recommended average for all CPS caseworkers in Texas.

Currently, 90 percent of children in foster care are placed in settings managed by private providers. Each child-placing agency is responsible for verifying, regulating, and monitoring individual foster and adoptive homes for compliance with minimum standards, statutory requirements, and the child-placing agency's own policies. State regulation and oversight of the private providers is limited.

This report outlines a number of steps the state can take to improve child safety in foster care. The report notes which recommendations were included in the April 4, 2014 proposals by the DFPS Council. After it receives public comments on its proposals, the Council is expected to approve them to take effect on September 1, 2014.

Policy Recommendations

Training for Foster Parents

- Increase pre-service training hours required before verification of licensed foster homes.
- Assess and standardize pre-service training provided by all contracted child-placing agencies.
- Provide additional support, training, and effective case management services to kinship caregivers to promote child safety and long-term placement stability.

Screening and Assessment of Foster Parents

- Determine and evaluate all home-screening and assessment procedures used by child-placing agencies (CPAs), including risk-assessment evaluations completed prior to verification and approval of licensed caregivers.
- Standardize home study evaluations and caregiver screenings based on best practice models.
- Require an updated foster home screening on an annual basis to ensure ongoing assessment of the relevant factors that can impact child safety and the successful placement of children.

Background Checks on Foster Parents and Others

- Require background checks and CPS history on all adult children of the caregiver and other individuals with a significant relationship to the caregiver, including current and former spouses of the foster or kinship caregiver and any non-custodial parents of children living in the home.*
- Require additional references of prospective foster parents from non-relatives as part of the screening and assessment process of prospective licensed caregivers.*
- Ensure child-placing agencies have access to all Residential Child Care Licensing (RCCL) and CPS history, including narrative details of minimum standard violations and investigations of maltreatment classified as “ruled out” or “unable to determine.”
- Ensure the DFPS Public and Provider website is updated in a timely manner and reflects statewide private agency information.

Oversight and Monitoring of Foster Homes

- Require a minimum number of unannounced visits to licensed placements by CPA case managers, CPS caseworkers and RCCL staff, including contract management staff.*
- Apply the same standards for screening and investigating reports of maltreatment of children living in their own home to reports of abuse and neglect in a licensed facility, including the gathering of collateral information from various parties.

DFPS Workforce

- Align caseloads with national standards to ensure child safety.

** Included in new DFPS Council proposals.*

Introduction

Even one child's death is a devastating reflection of holes in our child welfare system. When children are removed from their home due to abuse and neglect, our state's child protection system is conveying to parents that their child is safer in the care, custody, and control of the Department of Family and Protective Services (DFPS) than in the child's own home. DFPS is the regulatory agency charged with protecting our state's most vulnerable kids, those removed from their primary caregivers due to abuse and neglect and placed in foster care. Unfortunately, our state is not doing everything it can to protect our most vulnerable kids. DFPS lacks consistent supports and meaningful practice guidelines that ensure a child's safety and security in foster care.

Child Fatalities in Foster Care

According to DFPS, the number of abuse and neglect-related child fatalities in foster care has risen sharply. In fiscal year 2013, ten kids in the custody of DFPS' Child Protective Services died as a result of abuse and neglect, compared to two child deaths in the previous fiscal year. In contrast to this increase of abuse and neglect-related deaths in foster care, figures provided by DFPS indicate that abuse and neglect-related child fatalities in the general population appear to have declined from fiscal year 2012 to 2013. This suggests a standard of care that is less than adequate for children in foster care and, possibly, a system that is less safe than a child's own home.ⁱ Unfortunately, these recent tragedies are all too familiar. From 2003 to 2005, Child Protective Services experienced a major crisis with child deaths, both in children's homes and in foster care. And today, we again question the Texas foster care system's ability to protect kids from further abuse and neglect.

While these recent incidences of abuse and neglect resulted in the most tragic outcomes, for many foster youth, foster care is not a place where they can heal, but a place where they experience continued maltreatment, neglect, and isolation. Without stronger safeguards and additional support, threats to our most vulnerable children, including the risk of possible abuse and neglect while in foster care, will not be adequately evaluated, and the outcomes for children aging out of foster care will remain poor.

Funding a Child Protection System that Can Actually Protect Kids

Historically, chronic underfunding has plagued the Texas child welfare system. Compared to other states, Texas relies more on federal spending and invests little of its own money in child welfare services.ⁱⁱ In 2012, Texas ranked 36th among states on spending per foster child.ⁱⁱⁱ In terms of the child welfare workforce, the legislature has not provided consistent and adequate financial support to ensure caseloads are manageable and that caseworkers have the support, including competitive pay, needed to improve outcomes for kids. Caseloads have consistently been unmanageable and well above the recommended average for all CPS caseworkers in Texas.^{iv} Salaries are not competitive; according to the Texas state auditor, pay rates for more tenured caseworkers at CPS do not match the salaries of neighboring states.^v

*Texas is
36th
among
states in
spending
per foster
child.*

These most recent tragedies follow the devastating cuts of the 82nd legislative session. In 2011, the governor signed a budget that reduced funding for DFPS, leaving the system without the resources

needed to ensure safety and permanency for our state's children. The approved budget maintained past funding levels, but did not include additional support needed to provide vital services for a growing child population. The agency's cap for full-time employees was decreased by over 200 direct-delivery staff. Although some staff reductions were put towards already vacant positions, the department reduced staff support, supervisors, and specialty positions in order to preserve caseloads for those working directly with children and families. However, due to increased demands placed on caseworkers and continued caseload growth, the turnover rate of CPS caseworkers reached an all-time high in 2012, endangering children and delaying their path to a permanent home.^{vi} Following these drastic cuts, 38 percent of entry-level CPS workers left while still within the first two years of their employment, endangering children and delaying permanency for our most vulnerable Texans.^{vii}

In 2013, the 83rd Texas Legislature appropriated additional resources and restored funding for certain areas. Overall, the approved 2014-2015 budget provided additional support for the expected increase in the number of children in the system and for various aspects of the system that help ensure the safety and well-being of the children and families served by DFPS. However, this funding provided only a partial restoration to pre-2011 resources. Even prior to the 2011 cuts, DFPS was underfunded, as reflected by high caseloads and low pay for staff. Additionally, this reinvestment into DFPS does not result in immediate changes; it takes time to implement legislative changes, particularly hiring and training new staff.

Outsourcing the Safety and Well-being of Children in Foster Care

A decade ago, Texas started relying more on private agencies to play key roles in the foster care system. Currently, 90 percent of children in foster care are placed in settings managed by private providers.^{viii} Each child-placing agency is responsible for verifying, regulating, and monitoring individual foster and adoptive homes for compliance with minimum standards, statutory requirements, and the child-placing agency's own policies.

In 2005, policymakers attempted to further privatize foster care.

Privatization did not happen, in part, as our Children's Campaign Report explained, because of concerns that existing privatization was putting children in danger.

In response to the increase in child deaths in foster care from 2004 to 2005, and recommendations outlined in the Comptroller's 2004 report, *Forgotten Children: A Special Report on the Texas Foster Care System*, attempts were made to further privatize foster care. Yet by 2006 — a year when three foster children died in homes overseen by private agencies — the rate of children abused or neglected during their time in foster care had more than tripled.^{ix}

Foster Care Redesign is the name of the latest attempt to reform the foster care system, this time by shifting to a performance-based contracting model of delivering services to children and families in the child welfare system within a limited service area. The current structure consists of DFPS entering into contracts with over 300 private agencies whose payment is based on the level and intensity of services delivered. Under Foster Care Redesign, by contrast, one entity, the Single Source Continuum Contractor (SSCC), is designated to manage the provision of all services in a given region of the state. In 2011, DFPS received legislative approval to implement Foster Care Redesign and amend foster care payment rates under the new system. Although the aim of this initiative is to improve child and family

outcomes, no additional funding was budgeted for the additional infrastructure and oversight needed to ensure these goals are met.

As a pilot program, Foster Care Redesign operates now for children and youth entering foster care from DFPS Regions 2 and 9 (north and west Texas). Providence Services Corporation of Texas, a for-profit entity and new foster care provider in Texas, is now responsible for finding and managing foster homes or other living arrangements for all children in paid foster care in over 60 counties in Texas and for ensuring children receive the services they need. These efforts continue to expand across the state. A contract to provide services in Arlington and surrounding counties was awarded to ACH Child and Family Services.

The Department's Plan for Safety

In response to the recent child fatalities, DFPS released the "DFPS Safety Plan for Children in Foster Care." It details the agency's recommendations and plans to increase child safety in foster care. Additionally, the Department scheduled forums with private providers across the state in order to gather input and additional recommendations. On April 4, 2014, the DFPS Council proposed additional requirements for providers during the screening and assessment of prospective caregivers. After reviewing public comments, the Council is likely to approve the proposals to take effect on September 1, 2014.

While the Department's prompt response and focused attention are commendable, the agency should not allow private provider input to trump what is actually best for kids. The Department should continue to put stronger safeguards in place and ensure minimum standards reflect best practices. As the entity responsible for children in the conservatorship of CPS and of contracted providers, the DFPS should outline clear standards for providers and consequences for failure to meet those standards. While some improvements have been addressed by the Department, the plan put forward by DFPS reflects a deference for provider concerns and fails to require the standardization and accountability that will help prevent recurrence of the tragedies that the agency is seeking to respond to.

What Texas Can Do to Keep Foster Kids Safe: Child-Focused Recommendations

In addition to increased investments by the legislature and continued thoughtful consideration of reform efforts, the state must pursue additional measures to ensure safer and more successful placement opportunities for children in foster care. Those measures include comprehensive caregiver screening and assessments, effective training for all types of caregivers, and improved oversight and monitoring.

Training for Foster Parents

Caregivers must receive the training necessary to meet the complex needs of children impacted by trauma. Training that is insufficient or inadequate may lead to an increased risk of child maltreatment.

Increase pre-service training hours required before verification of licensed foster homes.

Texans who are interested in caring for foster children are only required to receive eight hours of pre-service training,^x ranking Texas near the bottom among states that require the completion of a specific number of pre-service training hours.^{xi} Additional hours may be required by DFPS if prospective caregivers are seeking children with higher levels of need. As noted on the Foster/Adopt website managed by CPS, the agency recognizes that the minimal number of pre-training hours for foster parents is insufficient. It requires families seeking licensure directly through the Department to complete 35 hours of competency-based training, but it does not extend the requirement to families who are licensed by outside entities.^{xii}

In addition to the skills and knowledge gained by prospective caregivers during training, pre-service training is often used as an opportunity to further assess the strengths and weaknesses of prospective caregivers and, if needed, screen out those individuals who may not be appropriate to foster or adopt. Inadequate training may lead to the approval of caregivers who are either not prepared for or are not capable of ensuring the safety of these children and promoting the best outcomes.

Assess and standardize pre-service training provided by all contracted child-placing agencies.

To maximize the state's investment in pre-service training and ensure the best outcomes for all children living in licensed care across the state, there must be consistency and quality standards in the selection of training methods by contracted providers. Currently, contracted providers can determine the curriculum and training models used to train prospective caregivers during the verification process.^{xiii}

Examples of pre-service training hour requirements for foster parents caring for children:

- DePelchin Children's Center: 30 hours
- Therapeutic Family Life: 22 hours (TFL indicates they require more training for children with special needs.)
- Arrow Child Family Ministries: 32 hours

With no standardized and/or uniform training methodology required by the Department, the quality and effectiveness of training varies across the state. Effective training ensures foster parents have the capacity, skills, and knowledge to address the complex and challenging needs of children in foster care. Adequate and sufficient training also reduces the risk of child maltreatment and placement disruptions.^{xiv}

Provide additional support, training, and effective case management services to kinship caregivers to promote child safety and long-term placement stability.

For children who are awaiting permanency, placement with a relative often offers a promising alternative to temporary placements with foster families. Though kinship care is not the best choice for every child, when it is a safe option, it can provide a child the benefits of care in a familiar setting. In Texas, kinship caregivers are often not prepared to meet the challenging needs of abused or neglected children coming into their home. Unfortunately, they receive limited guidance and support from DFPS.

Training opportunities specifically tailored to the individual needs of kinship caregivers should be developed and made easily accessible.

Furthermore, as recommended by DFPS in February 2013, kinship caseworkers should provide additional guidance and support to kinship homes and conduct a review of regular and frequent visitors.^{xv} DFPS has proposed providing this additional guidance in part in the form of an updated manual for caregivers, however a more effective strategy for supporting these placements is likely to include providing individual support to adequately assess the needs of the caregiver and help guide the caregiver to make healthy decisions, through coaching, planning, and continued therapeutic support.

Screening and Assessment of Foster Parents

Like many other states, Texas has a limited number of foster homes available. This shortage often leads to a hastened and inadequate assessment and screening process, as well as placement matches that are not in children's best interest, leaving them vulnerable to further maltreatment.

Determine and evaluate all home-screening and assessment procedures used by child-placing agencies (CPA's), including risk-assessment evaluations completed prior to verification and approval of licensed caregivers.

While DFPS Minimum Standards require background checks and home-study evaluations, contracted providers may use any number of tools for screening, training, and monitoring prospective foster parents.^{xvi} For example, a provider in Austin may utilize the Casey Home Assessment Protocol screening tool, in addition to the DFPS formal home study evaluation. A child-placing agency located in San Antonio, by contrast, may require families to complete a minimum number of observation hours with current foster families.

The Department should only pay for tools and services shown to increase safety and well-being for kids living in residential facilities. An evaluation of strategies used by contractors to screen and verify potential caregivers would allow the state to promote and invest in best practices that truly ensure the best outcomes for kids in foster care.

Standardize home study evaluations and caregiver screenings based on best practice models.

In Texas, DFPS contracts with many outside providers for home screenings and assessment services. The Department requires providers to gather certain basic information in the formal home-study evaluation, such as demographic information, criminal history and background checks, physical description of the home, capacity for providing care for children, and employment and financial information. There is significant flexibility, however, in what methods and tools are used to gather the required information.^{xvii}

The home-study evaluation is a core component of screening and assessing prospective caregivers and determining potential risk factors. If not done thoroughly, the screening and evaluation process could endanger a child, leaving that child poorly protected and vulnerable to placement disruptions. More

consistent, reliable, and accurate assessments would be completed if the methodologies used to complete the evaluation were similar across the state and based on best practices.

Examples of best practice assessment tools include:

- **Structured Analysis Family Evaluation (SAFE).** This widely used assessment tool is the most researched home-study methodology available at this time. The model can be used to assess all types of caregivers, including foster, adoptive, and kinship caregivers. SAFE strengthens a worker's ability to examine a prospective caregiver's family history and current functioning in a consistent manner.^{xviii}
- **The Casey Foster Applicant Inventory (CAFI) and the Casey Home Assessment Protocol (CHAP).** The CAFI and CHAP address a broad range of characteristics of foster parents in order to identify strengths and areas that need development and support. Both tools can be used during the foster family application and selection process. As noted in a recent DFPS meeting with stakeholders, some providers are using these tools as part of the verification process.

Require an updated foster home screening on an annual basis to ensure ongoing assessment of the relevant factors that can impact child safety and the successful placement of children.

Following the approval of an initial home-study evaluation, foster parents are not required to complete another comprehensive screening and assessment. The Department only requires private agencies to amend home studies if caregivers are seeking licensure by a different child-placing agency. Given the likelihood that factors impacting child safety and placement stability of children may change, caregiver screenings should be updated on an annual basis.

Caregiver screenings should be updated on an annual basis.

Similar to the process of verifying a caregiver previously with another agency, these screenings could be mere updates based on the initial comprehensive evaluation and completed by the case manager assigned to the case. Additionally, if completed by the agency case manager working with the family, the screening would more accurately reflect the caregiver's strengths, risks, and areas of improvement.

Background Checks and References for Foster Parents and Others

Standard sources of information for making an informed family evaluation must include criminal history and background checks, references, and information on other relatives and all related children living in or out of the home.

Require background checks and CPS history on all adult children of the caregiver and other individuals with a significant relationship to the caregiver, including current and former spouses of the foster or kinship caregiver and any non-custodial parents of children living in the home. (DFPS Council proposed this recommendation on April 4, 2014.)

Currently, background checks are only required for individuals living at least part-time in the home of the prospective foster parent. According to DFPS minimum standards, any person, excluding other foster children in the home, 14 years of age or older who will *frequently visit the home*, must obtain a criminal history and central registry background check.^{xix}

Experts agree that *all related children* living in or out of the home, even if caregivers say they will not frequent the home, should be screened for criminal history, references, and background checks.^{xx} Additionally, non-custodial parents of children residing with the licensed or relative caregiver should be screened for criminal and prior CPS history.

Require additional references of prospective foster parents from non-relatives as part of the screening and assessment process of prospective licensed caregivers. (DFPS Council proposed this recommendation on April 4, 2014.)

As part of the home-study process, DFPS requires an interview of any relative children, 12 years old or older, not living in the home.^{xxi} To ensure a more detailed and accurate picture of the foster family, additional contacts not related to the potential foster parents should be engaged in the assessment process.

In West Virginia, for example, foster parents are required to provide no less than four references from people who are not related to them.^{xxii}

Ensure child-placing agencies have access to all Residential Child Care Licensing (RCCL) and CPS history, including narrative details of minimum standard violations and investigations of maltreatment classified as “ruled out” or “unable to determine.”

During the provider safety forum facilitated by DFPS on November 6, 2013, child-placing agencies explained the challenges of obtaining the history of licensing violations and allegations of abuse and concern prior to verifying foster homes and placing children with licensed caregivers. Currently, private agencies only have access to limited information that is made available on the DFPS Central Registry and DFPS Public and Provider website.

When child-placing agencies check for previous abuse and neglect history, the DFPS Central Registry does not flag individuals with a case that was “ruled-out.” Although it may have been determined that an allegation of maltreatment did not occur and was thus “ruled out,” a history of reports to CPS may indicate potential risk factors, including cultural and psychosocial dynamics of the individual that would not make him or her a good fit for providing substitute care to children. Additionally, families could have significant minimum standard violations without appearing on the DFPS Central Registry. If verified by a child-placing agency, these violations could highlight a need for additional services and supports. Without all the information and specific case details, child-placing agencies are more likely to verify homes that are not appropriate for children.

Ensure the DFPS Public and Provider website is updated in a timely manner and reflects statewide private agency information.

As noted above, child-placing agencies do not have full access to valuable information that is needed to adequately screen and assess caregivers. The DFPS website was created to allow private agencies to search for inspection and monitoring history, including a list of closed foster homes. However, according to providers across the state, the website is not an accurate and reliable source of information. The website only lists the local inspection and monitoring history rather than statewide information. Again, information that could be used to screen and assess prospective caregivers should be easily accessible to those entities responsible for verifying and licensing foster parents. This recommendation was previously highlighted in the Texas Comptroller's 2005 Report.

Oversight and Monitoring of Foster Homes

Child Protective Services needs stronger accountability standards to ensure contracted providers are securing each child's safety, well-being, and path to a permanent, loving home.

Require a minimum number of unannounced visits to licensed placements by CPA case managers, CPS caseworkers and RCCL staff, including contract management staff. (DFPS Council proposed this recommendation on April 4, 2014.)

Currently, CPS caseworkers are required to have monthly, face-to-face meetings with children on their caseload.^{xxiii} For private agency staff, CPA case managers must have monthly face-to-face contact with children in their care.^{xxiv} However, there is no requirement that these visits be unannounced.

While these contact requirements are important to ensuring overall child safety, there is no standard for completing unannounced visits. Requiring a minimum number of unannounced visits would allow for more accurate observation of both the home and the interactions between the child and caregiver. This recommendation was included in the Texas Comptroller's 2005 Report.

Apply the same standards for screening and investigating reports of maltreatment of children living in their own home to reports of abuse and neglect in a licensed facility, including the gathering of collateral information from various parties.

When there is an allegation of abuse or neglect in a licensed residential care facility, RCCL is the entity responsible for completing the investigation. Responding to allegations of abuse and neglect by licensed caregivers is similar to responding to reports of maltreatment by a child's biological parent or other primary caregiver, yet the process for investigating out-of-home maltreatment is vastly different. Investigating in-home abuse and neglect is handled by CPS investigators. To ensure child safety remains a priority during all stages of service, reports of abuse and neglect of foster children should be addressed with the same standards as reports of maltreatment by a child's primary caregiver.

The Child Welfare League of America (CWLA) released best practice standards for investigating reports of abuse and neglect in foster care. When completing an investigation, CWLA recommends input from multiple sources, including the children, birthparents, foster parents, child welfare staff, and community professionals.^{xxv} According to policy, RCCL investigators are required to notify only the child's primary CPS caseworker via email or phone within 24 hours of an open investigation of abuse

and neglect in a licensed facility.^{xxvi} However, the assigned RCCL investigator isn't required to complete an interview with the child's primary caseworker. Additionally, the RCCL investigator is not required to gather information from collateral contacts, including the child's biological parent, attorney, and Court Appointed Special Advocate (CASA). The child's CPS caseworker and other involved parties are likely to have first-hand knowledge of the concerns raised and valuable information that could inform the investigation and lead to a more accurate finding. Additionally, the caseworker may be more effective in gathering information directly from the child. Victims are less likely to disclose concerns to individuals they do not know and trust.^{xxvii}

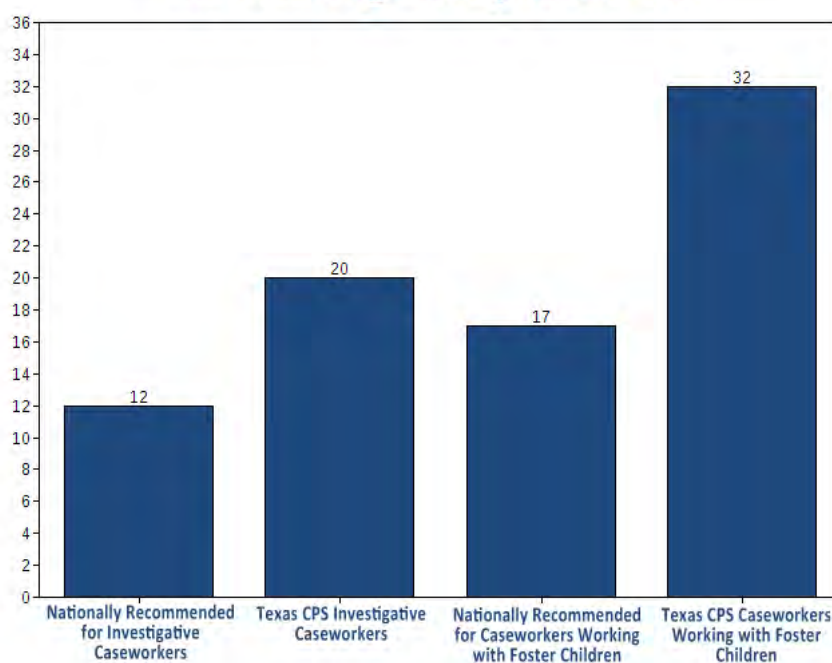
DFPS Workforce

Workforce issues, including training and retention, are vital to preventing maltreatment in foster care.^{xxviii} A supported, well-trained, valued workforce within the crisis-oriented environment of CPS would improve outcomes for the families and children CPS serves.

Align caseloads with national standards to ensure child safety.

The average caseload for all CPS workers in Texas is well above the nationally recommended caseload of 17.^{xxviii} In 2013, the average daily caseload in Texas was about 20 children for every one investigations caseworker.^{xxix} There were roughly 32 children for every conservatorship caseworker—almost double the recommended average. Caseworkers are the people charged with protecting some of our most vulnerable children and should be provided a manageable caseload that ensures appropriate supervision and does not leave children at risk of further abuse and neglect.

CPS Average Daily Caseloads



Sources: CWLA, 2012. DFPS Annual Data Book, 2013.

Additionally, high caseloads exacerbate high turnover rates. High turnover within CPS leads to further undesirable outcomes for abused children. A study conducted by the U.S. Government Accountability Office found that high turnover rates leave the remaining staff without enough time to establish relationships with families and make appropriate decisions to ensure the child's well-being.^{xxx}

Hiring more staff will lead to decreased turnover, higher retention of qualified staff, and better outcomes and experiences for the children and families served by CPS.

Conclusion

Our children deserve to be safe from continued maltreatment by a system that was created to protect them. The prevention of child maltreatment must be a priority for CPS, and it begins with thoughtful consideration, preparation, and training of potential foster and kinship caregivers. Despite limited foster home capacity, our state must promote a standard of care that goes beyond "acceptable"; we need one that will result in the best outcomes for children impacted by abuse and neglect.

As we look at ways to increase child safety in foster care, we must acknowledge the value of consistent and strategic investments by the legislature; DFPS oversight and accountability standards that hold private contractors accountable; and a commitment to improvements that are truly meaningful and sustainable. The Department needs the resources to build capacity and provide a standard of care that is best for kids in substitute care.

For years, Texas has attempted to patch over the holes created by chronic underfunding with continued reform efforts that focus on pushing responsibility for the state's children onto the private sector without additional investment and oversight. Unfortunately, as we have seen in previous attempts, shifting the state's responsibility onto others has not resulted in better outcomes for kids. At times, it has put children in more dangerous situations. As continued reform efforts move forward and the recent tragedies remain top of mind, continued discussion and review of privatization efforts should be a priority.

ⁱ DFPS Safety Plan for Children in Foster Care released on October 24, 2013.

ⁱⁱ Center for Public Policy Priorities (2010). *The Guide to Texas Child Protective Services*. Available at: http://library.cppp.org/files/4/CPSpaper_web.pdf.

ⁱⁱⁱ Foundation for Government Accountability (2012). *Right for Kids 2012: Which State Child Welfare Systems Are Right for Kids*. Available at: <http://rightforkids.org/files/8113/4064/8461/FGA-RightForKidsBook-web-single-pages.pdf>.

^{iv} "Guidelines for Computing Caseload Standards," (CWLA: Together, Making Children and Families a National Priority), accessed February 6, 2012, <http://www.cwla.org/programs/standards/caseloadstandards.htm>.

^v Texas State Auditor's Office (2013). *Caseload and Staffing Analysis for Child Protective Services at the Department of Family and Protective Services*. Retrieved from <http://www.sao.state.tx.us/reports/main/13-036.pdf>.

^{vi} Ibid.

^{vii} Rider 11 – Human Resources Management Plan, Report from the Texas Department of Family and Protective Services, October 1, 2012.

^{viii} DFPS Safety Plan for Children in Foster Care released on October 24, 2013.

^{ix} Children's Campaign Report, 2009 by Texans Care for Children. The report draws on Texas and U.S. data from: U.S. Department of Health and Human Services (HHS), Administration for Children and Families, Children's Bureau. "Child Maltreatment: Reports from the States to the National Child Abuse and Neglect Data Systems - National statistics on child abuse and neglect."

^x Texas Administrative Code. §749.863(a). <http://info.sos.state.tx.us/fids/201004386-1.html>.

^{xi} Home Study Requirements for Prospective Foster Parents. Child Welfare Information Gateway. www.childwelfare.gov/systemwide/law_policies/statutes/homestudyreqs.cfm.

^{xii} DFPS Foster/Adopt (FAD) Program. Information available at: http://www.dfps.state.tx.us/Adoption_and_Foster_Care/Get_Started/requirements.asp.

^{xiii} §749.863. Minimum Standards for Residential Care.

-
- ^{xiv} Best and Evidence-Based Practices that Enhance Safety of Children in Foster Care.
- ^{xv} DFPS Safety Plan for Children in Foster Care released on October 24, 2013.
- ^{xvi} §749.2449. Minimum Standards for Residential Care.
- ^{xvii} See Division 2 of Chapter 749, Subchapter M, for all home screening standards.
http://www.dfps.state.tx.us/child_care/residential_child_care_licensing/foster_content_sample.asp.
- ^{xviii} Crea, T.; Barth, R.; and Chintapalli, L. (2007). *Home Study Methods for Evaluating Prospective Resource Families: History, Current Challenges, and Promising Approaches*.
- ^{xix} §745.375. Minimum Standards for Residential Care.
- ^{xx} Crea, T.; Barth, R.; and Chintapalli, L. (2007). *Home Study Methods for Evaluating Prospective Resource Families: History, Current Challenges, and Promising Approaches*.
- ^{xxi} §749.2449. Minimum Standards for Residential Care.
- ^{xxii} Home Study Requirements for Prospective Foster Parents. Child Welfare Information Gateway.
www.childwelfare.gov/systemwide/law_policies/statutes/homestudyreqs.cfm.
- ^{xxiii} *The Child and Family Services Improvement Act of 2006 (CFSIA) P.L. 109-288*[External Link](#) Section 7 (a) and (b) and Social Security Act, Title IV-B, [Section 424](#)[External Link](#) (e)(1) and (2).
- ^{xxiv} §749.1291. Minimum Standards for Residential Care.
- ^{xxv} Child Welfare League of America (2003). *Child Maltreatment in Foster Care: Best Practice Guidelines*. Available from:
<http://www.hunter.cuny.edu/socwork/nrcfcpp/downloads/policy-issues/maltreatment-guidelines.pdf>.
- ^{xxvi} DFPS Handbook. See 4272 Abuse and Neglect Investigations of Placements Regulated by RCCL.
- ^{xxvii} Child Welfare League of America (2003). *Child Maltreatment in Foster Care: Best Practice Guidelines*. Available from:
<http://www.hunter.cuny.edu/socwork/nrcfcpp/downloads/policy-issues/maltreatment-guidelines.pdf>.
- ^{xxviii} "Guidelines for Computing Caseload Standards," (CWLA: Together, Making Children and Families a National Priority), accessed February 6, 2012,
<http://www.cwla.org/programs/standards/caseloadstandards.htm>.
- ^{xxix} DFPS Annual Data Book. (2011). Available from:
http://www.dfps.state.tx.us/documents/about/Data_Books_and_Annual_Reports/2011/DataBook11.pdf.
- ^{xxx} Child Welfare: HHS Could Play a Great Role in Helping Child Welfare Agencies Recruit and Retain Staff," (United States General Accounting Office, 2003, Washington, D.C.) Retrieved from <http://www.gao.gov/new.items/d03357.pdf>.