



STATE

CHILD WELFARE SERVICES

PLAN

FOR THE STATE OF

MAINE

FOR TIME PERIOD BEGINNING OCTOBER 1, 1980

AND ENDING SEPTEMBER 30, 1981

Submitted to:

CHILDREN'S BUREAU

ADMINISTRATION FOR CHILDREN, YOUTH AND FAMILIES

OFFICE OF HUMAN DEVELOPMENT SERVICES

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES

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FISCAL YEAR 1981-1982

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I hereby approve and submit the State Child Welfare Services Plan, which includes the required Assurances, operational strategy, and the State budget request for the time period beginning October 1 ____, 1980 and ending September 30 _____, 1981.

The <u>Maine Department of Human Services</u> (Designated Single State Agency)

has the authority to prepare the State Plan; is the sole State agency responsible for administering the State Plan; and is primarily responsible for administering the Child Welfare Services Program within the State.

Michael R. Petit, Commissioner Maine Department of Human Services

Walsh, Director Peter E. Bureau of Resource Development

With the exception indicated below, the State complies with the requirements of law and regulations listed in the Assurances.

The State Agency is including in this Plan goals and objectives which will enable it to meet those <u>Assurances</u> which, as indicated below, are not being met.

NUMBER	TITLE	MAINE OBJECTIVE
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Ð Dated: Reviewed by

Michael R. Petit, Commissioner Department of Human Services

Dated:

Reviewed by

ACYF/CB Representative

III. FORWARD

Following is an analysis of Child Welfare service needs in Maine, and a description of the initiatives being taken to address many of these needs.

This plan was developed initially through the work of a multi-disciplined team of Maine professionals who met regularly over a five month period. The team included central office and regional child welfare administrators, representatives of the Divisions of Contractual Services, Information Systems, and Planning and Evaluation, and a representative from the Staff Education and Training Unit. These people were brought together for the first time as a cohesive working group to plan for Child Welfare services in a comprehensive fashion. The product of this committee was reviewed by a team of Federal representatives from the Region 1 office of the Children's Bureau of the Administration on Children, Youth, and Families. The document was finalized in a meeting of Federal and State representatives. This final document has been broadened in scope and perspective to reflect the full intent of the initiatives Maine is taking.

This plan is submitted as evidence of compliance by the Maine Department of Human Services with 45 CFR, Part 220.1.

IV. INTRODUCTION

The publication of this Child Welfare Services Plan for the State of Maine for the period October 1, 1980 to September 30, 1981 represents a significant milestone for the children and families who come into the child welfare system. It reflects events at the several political levels. At the state and local levels, Governor Joseph Brennan and Commissioner Michael R. Petit have made Child Welfare Services a top priority of their administration. Significant steps are being taken to improve and make more effective all services to children at risk, children in jeopardy, and children in the care and custody of the Department of Human Services.

At the Federal level, new initiatives include the passage of the major legislation, H.R. 3434 "Adoption Assistance and Child Welfare Act of 1980", and the revitalization of the Children's Bureau in the Administration for Children, Youth and Families. These steps mean that services and programs which may have suffered from "benign neglect" have been moved to the forefront of public policy issues for the 1980's. The combination of new federal, state, and local initiatives will bring about profound changes in the manner in which we all face up to our responsibilities for the strengthening and nurturing of children and families in this state and in the country as a whole.

At this time, therefore, it is useful and appropriate to reemphasize the underlying purpose of the Child Welfare Services Program as operated by the Department of Human Services. Simply stated, this purpose is to assist children and their families to live in as independent a state as possible, with a minimum of dependence on and intervention by state and federal programs. It is the stated philosophy of the Department of Human Services that "the family is the primary structure for the care, nurture, and development of services and the family must be the primary focus of services." Stated positively, the purpose of the Child Welfare Services Program is "to prevent the development of circumstances which are detrimental to children; to promote the kind of family life that encourages the wholesome development of children; and to promote the welfare of children."

The key point behind these philosophical goal statements are that Departmental Child Welfare Services must be seen as a means to an end -- not as an end in themselves. The end is the prevention of the breakup of families wherever possible, and when children must be removed from their families to assure a permanent and appropriate placement for children: back with their families if possible or, if that is not possible, in the most permanent substitute arrangement that can be made available. Departmental services for the majority of children and their families must be timelimited, short-term, and directed toward the end of a permanent legal relationship with a family. All of the resources of the Department of Human Services' Child Welfare Services Program must be directed towards this end. Any activity or program which is not must be eliminated or redesigned. Children in long-term care situations must become the exception rather than the rule. Every option for apporpriate alternate placements must be explored and implemented with priority to those offering the most permanence and stability for the child. For any child to stay in care for more than a year there must be a well documented, multi-disciplinary review specifically stating the reasons why more permanent options are not available to the child.

The goals and objectives outlined in this Child Welfare Services Plan take major steps in the direction of an appropriate, permanent placement for all children. The Department is examining intensely all of the children and families whom it serves, and the reasons why they come to the attention and into the care of the agency. The Department is examining closely the range of services provided to these clients, and it will be evaluating the effect of the services in terms of maintaining children in the most appropriate environment. As it becomes clearer what the full range of resources is that is needed to address the problems for children and their families, the Department of Human Services will adjust its service strategy. It will bring increasing amounts of fiscal and other resources to bear on their problems in a more and more direct manner. This broad initiative requires considerable organizational development, refinement of policies, procedures, services available, gathering of data, and development of political support. The goals and objectives identified in this plan reflect the steps Maine will take in the coming year to move it closer to a Child Welfare Services Program which provides consistently for agency involvement in a time-limited, prevention-oriented, effective fashion.

V. 1980-1981 STRATEGY

A. The Child Welfare Services Program In Maine

Maine conceives its Child Welfare Services program in terms of client groups and services to those groups to accomplish client objectives. The needs description below follows this format. The Department of Human Services (DHS) has identified 3 major client groups:

- 1. Children in the care or custody of the Department or in the care or custody of an agency in another state, and their families.
- 2. Children who are suspected to be or are being neglected, abused, or exploited, and their families.
- 3. Children in circumstances which may promote neglect, abuse, or exploitation, and their families.

Children in the first group are those for whom DHS has the most extensive, far reaching responsibility. Included in this group are those for whom the Department has assumed some parental responsibilities. The_____ child may be in the legal custody of the State of Maine, or another state, but living in Maine. The child may be in the temporary, voluntary care of this or another state.

The second group includes, in part, those families about whom a protective referral has been received and is being assessed. It also includes those families whose circumstances have been assessed, and who have been found to be neglecting, abusing, or exploiting their children. The Department has a clear legislative mandate to serve this group as well. However, the level of responsibility the Department has for this group is lower than for the first group above.

The third group includes children and families where there is a high potential for child neglect, abuse, or exploitation. Parents and others who abuse children do so in response to stress producing circumstances in their lives. The list of possible circumstances is almost endless. From this list the Department has chosen a rather small number of circumstances where it offers specific services to those encountering these circumstances or problems. Broadly interpreted, the intent of the services is to minimize the danger of abuse or neglect. The Department provides these services to families in the following circumstances:

- 1. Families for whom the courts must decide a custody issue.
- 2. Minors who are before the court for disposition of a petition to marry without parental consent.
- 3. Families seeking to adopt a child independently.
- 4. Families who are experiencing some difficulty in adjusting to the adoption of a child.

^{*}Not presented in any particular order.

- 5. Minors or adults who are pregnant, and are having problems planning for the expected child.
- 6. Children who are in conflict with the law.
- 7. Families for whom agencies in other states require information in order to make plans for children.
- 8. Families where no child is in jeopardy, but where there are high risk factors, and the family wishes to accept services on a voluntary basis.*

The Department provides and purchases a variety of services to help meet the needs of each group. The array of services is displayed below in chart form by target group. The services checked (\checkmark) are provided or obtained on a systematic basis for groups of clients. The array does not include the myriad of services that may be purchased for individuals through a small amount of discretionary money set aside for spcial needs.

In the charts below a distinction is made among in-house, purchased social services, and other purchased services. In-house services are provided by Department staff, made up primarily of human service workers, but also including others such as homemakers, licensing staff, and attorneys. These services represent the core services provided most Child Welfare clients. Other types of services may be needed to help a client in difficulty. One category is purchased social services. These are obtained through contracts with private agencies. Some quasi-medical services, such as psychological services, are listed in this column. These are paid for by Title XX only when they are integral but subordinate to another social service. "Other purchase services" are additional non-social services obtained through formal contractual or other agreements for Child Welfare clients by the Department.

^{*}This last group is a catch-all category used to legitimately serve a variety of "miscellaneous" types of cases. As of 1/1/79 164 cases were open in this category statewide.

CLIENT GROUP: Children in the care or custody of the Department of Human Services or in the care or custody of another agency in another state.

IN-HOUSE ¹		PURCHASED SOCIAL SERVIC	es ²	OTHER PURCHASED SERVICES ³
Advocacy	Γ			
				Board
Case Study/Review				
Case Management/Super- vision				
			r	Clothing
	V	Community Residential Treatment		
Counseling	1	Counseling		
✔ Court Activities				
	/	Day Care	ľ	
			r	Dental Care
	~	Developmental Skills Training		
			r	Education
	1	Family Planning		:
Homemaker		Homemaker		
└ Information				
· · ·			-	Medical Treatment
	2	Occupational Therapy		
Preparation and Placement				
			1	Prescription Drugs
		Psychological Services	5	Psychological Services
Recreation/Sociali- zation	2	Recreation/Sociali- zation		
Referral				
Resource Development				•
	1	Speech Pathology		
✓Transportation	Ľ	Transportation	1	Transportation
	4	Work Skills Training		

¹Social services provided by Department staff; paid for by Title XX, IV-B or State funds ²Social services provided by outside staff; paid for by Title XX

 3 Other services provided by outside staff; paid for through other funds such as Medicaid, Title IV-A funds, state appropriations, etc.

CLIENT GROUP: Children who are suspected to be or are being neglected, abused or exploited and their families.

IN-HOUSE ¹		PURCHASED SOCIAL SERVICE	.s ²	OTHER PURCHASED SERVICES ³
Advocacy				
	\uparrow			Board
Case Study/Review				
Case Management/Super- vision		·		
				Clothing
	-	Community Residential Treatment		
Counseling	~	Counseling		
✓ Court Activities	1			
	1-	Day Care		·
				Dental Care
	-	Developmental Skills Training		
-				Education/Tutoring
	K	Family Planning		
Homemaker	Ľ	Homemaker		
Information				
				Medical Treatment
	2	Occupational Therapy		·
V Preparation and Placement				
				Prescription Drugs
	V	Psychological Services		Psychological Services
Recreation/Sociali- zation		Recreation/Sociali- zation		
✔ Referral		· · · · · · · · · · · · · · · · · · ·		
Resource Development	_	<u>·</u>		
	1	Speech Pathology		
 Transportation 	1	Transportation		Transportation
	V	Work Skills Training		

¹Social services provided by Department staff; paid for by Title XX, IV-B or state funds ²Social Services provided by outside staff; paid for by Title XX

³Other services provided by outside staff; paid for through the funds such as Medicaid, Title IV-A funds, state appropriations, etc.

8.

CLIENT GROUP: Children in circumstances which may promote neglect, abuse, or exploitation, and their families.

IN-HOUSE ¹			PURCHASED SOCIAL SERVICES	2	OTHER PURCHASED SERVICES ³
~	Advocacy				
			·		Board
2	Case Study/Review				
1	Case Management/Super- vision			•	
					Clothing
		~	Community Residential Treatment		
2	Counseling	2	Counseling		
1	Court Activities			\square	
		2	Day Care	Ц	
	·		· · · · · · · · · · · · · · · · · · ·		Dental Care
		2	, Developmental Skills Training		
					Education/Tutoring
	· · · · · · · · · · · · · · · · · · ·	4	Family Planning		•
2	Homemaker		Homemaker		·
<u>~</u>	Information	\square			
	· · · · · · · · · · · · · · · · · · ·				Medical Treatment
		4	Occupational Therapy		
	Preparation and Placement				
					Prescription Drugs
. 		4	Psychological Services		Psychological Services
	Recreation Sociali- zation		Recreation/Sociali- zation		
V	Referral				·
	Resource Development	\square	· · · · · · · · · · · · · · · · · · ·		
			Speech Pathology		
V	Transportation	И	Transportation		Transportation
			Work Skills Training		

¹Social services provided by Department staff; paid for by Title XX, Title IV-B, or state funds.

 $^2\ensuremath{\mathsf{Social}}$ Services provided by outside staff; paid for by Title XX

³Other services provided by outside staff; paid for through other funds such as Medicaid, Title IV-A funds, state appropriations, etc.

B. Needs Analysis

The primary purpose of the Child Welfare Services Plan is to document areas where the child welfare program needs to be strengthened, and to describe initiatives to be taken to improve it. The first step in this process is to identify problems in the delivery of services to people, and whether these problems are related to needs of those being served, the services being offered, or the methods by which services are provided and administered. Thus, the needs analysis is a comprehensive examination of unmet child welfare needs. Below is a description of the sources used in identifying needs, and the organizational format used to describe them.

For years Maine's Department of Human Services (DHS) has conducted an ongoing analysis of its Child Welfare program needs. Sources have included information system output reports and other quantitative and qualitative information gathered from field staff and community sources. The findings have led to continued improvement in Maine's services to children.

This year's analysis, however, represents the most comprehensive effort the state has yet made. Both the number of individuals involved and the amount of information gathered and examined are larger than in the past. This year's analysis was conducted by the new Child and Family Services Planning Committee. The findings have been endorsed by the Director of the Bureau of Resource Development, the Director of the Office of Social and Rehabilitative Services, and the Commissioner of the Department of Human Services.

The unusual amount of information available is partly a result of the efforts of the Committee to pull together all the available information in a comprehensive way. It is also in part a result of the work of the Governor's Task Force on Foster Care. This independent group conducted a series of surveys and has made its preliminary findings available to the Committee through the Human Services Development Institute. Through the Task Force has come a wealth of information that would not have otherwise been available to the committee.

Information was drawn from several "primary" sources. In some cases, substantial special analysis was done on the data readily available through these primary sources of information. The results of these analyses are referred to as "secondary" sources. Following is a description of the key primary and secondary sources used in the needs analysis.

PRIMARY SOURCES

Ongoing Computerized Information Systems:

Management Information and Control System (MICS) and Social Services Delivery System (SSD)

This system covers clients provided in-house services by DHS. The system includes all DHS child welfare clients. It monitors, among other things, socio-economic characteristics, demographic information, program objective, service types and amounts, time period, clients served.

The Worker Activity Log, which is part of this system, captures information concerning direct service workers serving DHS in-house clients. It monitors, among other things, clients served, service types, amounts, time period by worker.

National Study on Child Abuse & Neglect (Denver System)

This system collects information on protective referrals for the American Humane Society. It covers those protective referrals opened as cases under the MICS. It gathers information on socioeconomic characteristics of perpetrator and victim of abuse or neglect, and nature of the problem by client. Extensive crosstabs are available through the national office in Denver.

Child Welfare Information System (CWIS)

This system covers all clients in the care or custody of the Department of Human Services. It gathers information on the client, including initial and current legal status, type of living situation, and time period by client, by location of the client and by responsible region. It is used to feed the Medicaid Management Information System and the Foster Care payment system.

Purchase of Service Contracts System (PSC)

This system covers all individuals receiving Title XX purchased services, and the agencies which hold Bureau of Resource Development contracts. It gathers information by client on demographics, type and amount of service provided, size of contract and key identifying information. Child Welfare clients are included among those served by Title XX purchased services.

Staff Education and Training Unit (SETU) System

'This system covers receipts of training provided through the DHS Staff Education and Training Unit. It monitors by worker and region the types and amounts of training provided to workers and contractual service providers.

Other Central Office, Regional Record Keeping Systems:

This refers to a variety of hand driven systems which monitor such things as number, types, and disposition of petitions for custody; numbers of adoptions, etc. Included here are individual client case records as well as counts of significant individual case actions that might be aggregated from case records.

Informal Knowledge of Program Administrators, Staff:

This is qualitative knowledge of client problems, service needs, policy gaps, and other areas, gleaned over time through experience working in the field.

Foster Care Task Force:

The Governor's Task Force on Foster Care conducted a variety of information gathering efforts. It conducted independent sample surveys of foster homes, ex-foster homes, other child caring facilities, adoptive homes, and regional office staff. Information gathered included demographic characteristics of those surveyed, service experience in the foster care system, perceived problems with and strengths of that system. The Task Force also conducted hearings, taking testimony from individuals who were a part of the foster care system or who related to it such as educators, corrections, and law enforcement people, and judges. It reviewed a sample of case records. It reviewed key pieces of literature on the field.

SECONDARY SOURCES

Management Information and Control System (MICS) Case Sample:

Bureau of Resource Development (BRD) Planning and Evaluation staff drew a sample of 130 clients opened on the MICS system as of January 1, 1980. This sample was analyzed to identify trends in in-house and purchased service usage patterns over time, and to gain some impressions about service effort.

Protective Utilization Study:

The BRD Planning and Evaluation Unit conducted an analysis of Title XX Purchased Service usage by open protective clients to date during the 79-80 contract year. In completing the study the Unit obtained data from MICS and PSC files. It also conducted interviews with protective workers.

Protective Petition Analysis:

The Division of Child and Family Services is presently completing an analysis of numbers and types of petitions for protective custody and outcome of the petitions. It is being compiled from hand tabulations kept in a variety of places in central office.

Adoption Data Analysis:

This is material drawn together in 1979 by the Division of Child and Family Services on public and private adoptions completed over an 11 year period. The original source was DHS hand collected data systems, and data kept by the Division of Vital Records.

Child Welfare Self-Assessment Findings:

This information includes the statewide and local level assessment work done to date by the Division of Child and Family Services and regional services staff. The survey was partially completed at both levels. Those completing the survey drew information from a variety of regional and statewide records, as well as general staff knowledge. Miscellaneous Documents:

Some periodic documents, which draw data from a variety of sources, proved useful. They included the 1979/80 Title XX Plan and the 1979-80 Child Welfare Services Plan.

The wealth of information listed above was weighed and sorted by various members of the planning committee. The results are presented below in the form of program needs.

The description of needs is organized in terms of the three target groups identified above, and in terms of the administrative services that support the child welfare program as a whole. Approached in this way, the key questions become:

1. For each target group:

- a. Clients included in group: Is the Department serving the appropriate clients; is it addressing sufficient numbers of those in need?
- b. Service offered (in-house, purchased): Are the services adequate, appropriate, and producing the desired outcome? Are the methods by which services are provided adequate and appropriate?
- For the administrative support services that cut across all target groups: Is there sufficient, appropriate, comprehensive effort in the following areas:
 - a. Planning
 - b. Resource Development
 - c. Program Implementation
 - d. Monitoring
 - e. Evaluation

Two distinctions should be emphasized. First is in-house vs. purchased services. In-house services are those provided by Department of Human Services social service workers. Purchased services are <u>all</u> those services purchased outside the agency. They include social services purchased through Title XX and IV-B, and other services such as medical treatment, educational training, and board.

Second is the distinction between the administrative issues (appropriate methods and procedures) considered under each target group, and the administrative support services which are considered separately. Some administrative supports, such as foster parent training or an evaluation of the case study process, address services to one target group exclusively. These are examined in terms of the appropriate target group. Other supports cut across the entire child welfare services program (e.g., planning, program wide policy development). The adequacy of these broad based services are considered separately.

In a very real sense, asking questions about clients served and service to target groups and then asking the questions about support services leads one to the same point. For example, we found that services to foster children have produced few permanent placements (have not had the desired outcome). We also found that there has been no strong policy or staff training to ensure this (program implementation has not been comprehensive enough or sufficient). We concluded that, at least in part, poor administrative supports produced the client related problem we noted.

However, we have chosen to ask both sets of questions anyway. The program initiatives described utlimately in the goals and objectives section are presented as administrative action steps (needs for more policy, more training, more evaluation). However, by examining problems from the client perspective as well, it has been possible to confirm that the planned initiatives are directed ultimately at improving impact on client need.

THE NEEDS*

- 1. Client Groups
 - a. Children in the Care or Custody of the Department

(1) Clients being served

There are approximately 2,400 children and young adults in care or custody of the Department of Human Services. Of those in care:

53% (1,612) are in family foster care
11% are in custody, but live in own home
9% are in a relative's home
8% are in a residential or group care facility
3% are in adoptive placement
2% are in independent living arrangements
2% are in the Maine Youth Center, a correctional facility,
or jail

Analysis of change in the characteristics of children in care in 1980 vs. 1960 provides some additional background information. Task Force data shows that the children in care in 1980 are older (median age of 12+ vs. 14). They also appear to be more troubled:

	1960	1980
Emotionally Disturbed	8%	26%
Acting Out (Defined in 1960 as Truancy)	0%	24%
Delinquent	1%	12%
Aggressive	6%	12%

These statistics hint at a significant problem area.

^{*}Most needs identified in this section are addressed in the goals and objectives section of the plan. Others will not be addressed and the justification for this appears in a different section. To aid the reader in making the connection between the need and the strategy for dealing with it, a referencing system has been included in the left hand margin. Needs that will be addressed in the coming year are linked with the goal and objective by number. For example, Goal IV, Objective 5, is written (IV-5). Needs that will not be addressed are identified by: (see Unaddressed Needs). Where other significant related information can be found elsewhere in the plan, this is also noted.

Experience of DHS staff and findings of the Governor's Task Force suggest that as the children have become older and more troubled, the reasons why they have come into care have been less appropriate when compared with the program's purpose, as described by law. Stated broadly, the Department is mandated to provide a temporary placement for children who have been abused or neglected. The intent is that they will be returned promptly to their rehabilitated natural families or moved into another permanent living situation. Yet, children are coming into care for other reasons: because their parents aren't able to control them; through the courts because they have been determined juvenile offenders; because they need special services which their parents cannot afford. Task Force data suggests that close to 25% of those coming into care fall into one of these categories; virtually all of this 25% fall into the first two.

Assuming custody is a profound legal step, children should come into care only when it is appropriate according to the narrow confines of Maine law.

(2) In-House Services

While foster care is intended to be a temporary arrangement, some children in Maine remain in care for extended periods. The Task Force found that as of November, 1979, approximately 25% had been in care 10 or more years; another 18% for more than 5 years. Although its policy stated a goal of permanence for children as soon as possible, there was no concerted Departmentwide emphasis on actively establishing the best permanent placement for each child. A Task Force sponsored review of case records indicated that:

26% of children in care have a case plan of return home 15% have a plan for adoption 41% have a plan for long-term care 16% have a plan for self-care (independent living)

An independent review by Department staff of the adequacy of the chosen plan provides additional perspective. For children over 15, case plans were generally appropriate. For children under 15, 20% of case plan objectives were only partially realistic; 20% were not realistic. Department practices need to follow policy more closely in emphasizing permanence.

(See ||-1)

(See I-1, I-2, I-3)

(3) Purchased Services

Foster children, by virtue of their status as state wards, become eligible for a wide range of social and other purchased services. This is, in fact one of the incentives for taking custody or for courts to commit children who would not normally come into care. Thus, for many children there is a good connection between what they need and what is made available.

However, certain services are in short supply. The Foster Care Task Force has noted gaps in placement resources to adolescents in general. Other groups identified include mildly or moderately emotionally disturbed children of all ages, developmentally disabled or multihandicapped children, and minority children.*

In relation to this, the Task Force has cited the Department for unnecessarily narrowing the range of foster homes available to children. HSDI research found that:

- (a) More of Maine's foster parents are married: 92% vs 62% of the state's adult population as whole, according to the 1970 census.
- (b) Foster parents are more educated than the overall population: 31% have education beyond high school vs 21% overall.
- (c) Foster parents have a higher income: 67% are middle income families vs 52% statewide.
- (d) Fewer foster mothers work: 29% vs 51% of all the women in Cumberland County.

These figures suggest that foster families are atypical, and imply that DHS has failed to gain access to significant numbers of families which can offer children successful placements.

The Task Force has further observed that:

"While traditional families, of course, are excellent resources for many of Maine's foster children, they often cannot meet the needs of those children whose behavior makes non-traditional demands on a family's life. It is notable, for example, that in cases where older adolescents have found their own foster families (approved but unlicensed home,** in Department terminology), 17% have chosen single people as foster parents; another 16% divorced people. In Maine, only 4% of licensed foster parents are single and another 4% divorced."***

***op. cit., p. 4

^{*}Governor's Task Force on Foster Care for Children, "Care of Children Within Foster Care System".

^{**}It is not required that foster children, age 16 or over, live in licensed foster homes.

These statistics suggest that present recruitment and licensing procedures exclude some homes that would serve as suitable alternatives to more restrictive care.

The Child and Family Services Planning Committee has noted these findings, but has chosen smaller portions of these problems to address in the coming year. One factor impacting on the lack of specialized placements in Maine has been the financial intricacies of reimbursement of providers for services. It has been extremely difficult to coordinate payment for comprehensive residential services since the responsibility for payment cuts across the three Departments.

A study of single source funding possibilities has resulted in a plan for a single contract process whereby the three participating Departments will jointly contract with specialized providers for the year beginning October, 1980. This plan needs to be implemented.

Another factor, impacting on both the lack of placements for children with special needs and the characteristics of the foster parent population, is the Department's recruitment procedure. In the past, foster home recruitment was done on an isolated, region by region basis. What has been needed is a more coordinated, systematic effort.

Work done during the current fiscal year has altered this approach. The central office Division of Licensing is assisting the regional offices in formulating a statewide recruitment plan. This plan will provide for statewide recruitment activities. However, it will also provide for regional activities designed to fill special, regional needs. Each region will be identifying the gaps in its resources, whether these are homes for teenagers, minority children, or children who act out, and targeting some of its recruitment activities toward filling these needs.

Another major problem is that the traditional placement resources available to adolescents in Maine are often unsuited to the needs of adolescents (as well as in short supply). Task Force statistics illustrate this. According to the survey of workers, 14% of teeange foster children have unsatisfactory placements. Similarly. 21% of all those in care have had between 4 and 10 placements. An additional 6% have moved 11 times or more. While adolescents have a hard time in foster care, the most permanent exit options, return home and adoption, are also less likely for these children. A variety of alternate arrangements for these children need to be examined and the best of these systematically developed.

Finally, it is noted that foster families are not adequately prepared or compensated for their service. Given that the foster children now in custody are by definition multi-problem children (including their own emotional and physical difficulties, their complex legal status, and their realtionship with their natural parents) they present a considerable challenge to even the experienced foster parent, not to mention the inexperienced one.

(See Status Report Section on Changes in Residential and Group Care Systems for more detailed discussion)

(See 11-2)

(See Status Report, Statewide Recruitment Plan)

(See IV-12)

(See 11-3)

The Department offers some orientation and training to foster parents. However, the Task Force again found:

- (a) 56% of those licensed parents responding to the HSDI survey indicated that a better orientation to being a foster parent is important (35% of the total identified it as very important).
- (b) 52% indicated a need for more ongoing training (26% very important)
- (c) 59% indicated a need for more training on special needs children (47% - very important)
- (See IV-13) Clearly a comprehensive effort is needed to better train new and established foster parents.

(See Unaddressed Needs Section) The financial reimbursement that the Department provides its foster parents is wholly inadequate. Parents receive about \$4.50 per day in basic board. There are slightly higher rates for children with special problems. Yet this rate barely covers the cost of food for the child, not to mention shelter, babysitting, licensing costs, time out for training, and the myriad of other expenses in raising a child. Foster parents need and deserve more money for their services.

- b. <u>Children Suspected to be or being Neglected</u>, Abused or Exploited and their Families
 - (1) Clients Served

The Department is mandated to investigate child abuse and neglect reports. Reports come from a variety of sources including various human service agencies, other government or private organizations, relatives, neighbors, and others. Many of these sources are mandated by law to refer suspected abuse or neglect. A few are not. Thus, while the Department decides which referrals are appropriate to open as cases, the population served is preselected by others.

It is generally accepted that child abuse and neglect crosses virtually all socio-economic barriers.* However, a comparative analysis of income levels and types of income shows that the general population in Maine differs significantly from those people opened for protective case study. The income level of the general population is higher:

- (a) 27% of the general population is under \$8,000;
 68% of the cases opened for protective study in 1979 fall into this income bracket
- (b) 43% of the general population is \$15,000 or above;
 7% of the protective studies fall into this bracket.

*It should be noted that 1979 National Child Protective Data has called this long held assumption. Future data may shed further light on this issue. Similarly, of those protective cases where the parent was employed, she/he tended to be somewhat less skilled than the general population:

- (a) 55% unskilled vs 45% of the employed general Maine population
- (b) 32% skilled vs 39% of the employed general population
- (c) 8% professional vs 12% of the employed general population

(See Unaddressed Needs Section) There are a variety of factors that create this situation, not the least of which is the image of the Department as primarily a welfare agency. The Department needs to broaden the range of the general population it serves. However, while the agency conducts some ongoing community education efforts, this is an area which is not easily addressed.

(2) In-House Services

Social service agencies and other organizations are required by law to report incidents of child abuse and neglect to the Department. Yet, in some situations agencies find their own mandates in conflict with the law, e.g., confidentiality regulations for substance abusers in treatment.

(See III-2) In other situations, the broader interface between the agency and DHS is left unclear by law and has simply never been worked out in detail in practice. In these situations, the areas to be worked out go beyond reporting of suspected child abuse or neglect. Included are investigation of complaints, and treatment of validated cases. Four agencies where broader agreements are needed are the juvenile intake program, public health nurses, the venereal disease program, and local district attorneys. In all of these cases the Department can broaden both the spectrum of children it covers, and expand the quality and scope of the service it provides.

> There is considerable detailed information available about the quality and effect of services to foster children due to the work of the Task Force, as described above. There is much less available at present on services to protective clients. Thus, the major service problems identified in terms of this group center around not knowing enough about services in a comprehensive, statewide fashion.

One area in which this is true is in case assessments. We do not know for example if the assessments being done on referrals are accurately, consistently separating the dangerous situations from the less serious ones. The committee found that it could not document that assessments were being completed in compliance with time limits set by Department policy. It was the subjective impression of regional administrators that we are more or less in compliance. At the same time, an analysis of a sample of cases opened for case study showed an average time open as a study (PC50) of approximately 4 months. This is considerably longer than the six weeks specified by policy. While it is assumed that this statistic is a result of haphazard reporting techniques, more accurate information is needed.

(See |||-1)

A similar lack of information exists about the impact of in-house and purchased services on families opened for protective services. Analysis of a sample of cases opened on the MICS system indicated that about 50% of the cases opened for study later became active protective service cases. Past analysis of protective cases has shown that about one referral in ten ends up with the Department seeking custody of the child(ren) involved. However, lack of emphasis on accuracy of data at the point of input, and failure of the system to provide for capturing some important bits of information make it difficult to establish a success/failure rate from these figures. It is important to know more about protective service effect.

One area that impacts on Department performance is the size of the case load for which workers are responsible. One Maine estimate of a manageable caseload size established a ratio of 25 cases to one protective worker. However, analysis of open protective cases and workers reporting service against these cases shows a ratio of approximately 36 to 1. This does not account for the percentage of workers who are on vacation, sick leave or otherwise absent at any given time. At the same time it does not distinguish between active and inactive open cases. A true picture of DHS compliance in this area is important to obtain.

A major problem seen by regional and central office staff is lack of agreement over what constitutes a commitable case. Although there are no clear statistics to back up the contention it is generally agreed that a case one worker might take to court, another worker in another region, office, or unit might not. Procedures, guidelines and other mechanisms need to be developed for making this case action more systematic.

(3) Purchased Services

It is generally accepted that purchased services, offered in conjunction with protective casework prevent commitment of children. In this context, the Task Force cited the Home Builders program in Tacoma, Washington. This innovative, intensive in-home counseling program worked with 207 families where 311 members were scheduled for foster care or institutional care. In 87% of the cases placement was prevented.

In Maine, regional administrators, staff, and others agree that insufficient purchased services exist to support protective service case plans. In a study of utilization of Title XX services by protective clients, protective workers listed several services which were limited or not available. Those identified were day care, homemaker, housing, mental health, and nutrition. Another area consistently identified is transportation.

It is agreed that more purchased services are needed; there is consensus as to which services are needed. However, what has not been documented is how much service is needed - and which services will have the greatest impact for the dollars available. Needs must be documented, proposed expenditures justified in greater detail.

(See Unaddressed Needs Section)

(See 111-5)

(See |||-3)

(See IV-14)

c. Children and Families at Risk

(1) Clients Served

The Department presently serves several specific groups of clients identified to be "at risk" (as described in some detail on pages 5 and 6). However, the groups addressed represent only a portion of those truly "at risk". Other groups may or may not receive service through DHS, depending on the region and the size of the workload. Cases which may receive service include situations where a parent and child are in conflict but the child is not being abused or neglected; cases where there is violence between husband and wife and children are present but not directly involved. Other "at risk" groups are generally unserved statewide, e.g., situations where there is only marginal neglect, such as consistent poor money management, repeated evictions from housing, poor nutrition, and truancy cases. All of the above are examples of cases where children are on the verge of significant neglect, abuse, or exploitation. Yet they may not be served because they do not fall into a group that has been targeted for services.

(2) In-House Services

The largest group of "at risk" clients is the group referred by the courts or others for completion of a study. The 215 cases open as of January 1, 1980 represented between 5% and 6% of the total protective/preventive caseload. Yet, the service offered this group is not a tradition casework service. It is an isolated assessment, unassociated with other helping services.

An undetermined amount of DHS resources go into completing court studies. The impact of completion of the study is often unclear in the individual case, not to mention the aggregate group of cases statewide. Child welfare administrators feel that rising caseloads in other areas merit a closer examination of the cost and effect of this service.

(3) Purchased Services

Because of the limited nature of in-house casework services offered to children at risk, there is little connection between in-house clients and purchased services to meet their needs. This is not to say that clients at risk do not receive social or other services beyond those offered by DHS staff. They do. However, the services are obtained from private agencies according to the client's initiative and eligibility.

(See Unaddressed Needs Section) The Department may decide to redefine or expand the type of client offered preventive services. If this is done, the role of purchased services in aiding that client population should be examined.

(See 111-4)

(See Unaddressed

Needs Section)

2. Administrative Support Services Needs

A comprehensive system of regional and central administrative functions supports services to child welfare clients. Considerable strides have been made in the past year to improve this system. However initiatives are required in several areas.

a. Planning:

The Department has improved the nature of its planning process over the past year. The range of individuals involved in the process and the range of resources influenced has been expanded. However, as noted above, one major planning resource that is lacking is an ongoing needs assessment.

In attempting to project service needs for the coming year, the Planning Committee found that it had a general idea about what was needed. It did not, however, have clear information by region about the size of service need. Needs assessments can be very costly, particularly if the amount of resources available to allocate or reallocate is limited. However, more sophisticated needs information is required. A cost effective approach should be developed.

b. Resource Development:

Maine has a relatively aggressive approach to resource development for child welfare services. It obtains its full allotment of Title IV-B funds, accesses considerable Title XX and other funds for children and families, and actively pursues appropriate requests for proposals.

At the same time the Department's Bureau of Resource Development has indicated an interest in spending more Title XX dollars on "in-house clients", especially child welfare clients. This means shifting resources spent on other groups to child welfare clients. Such a shift demands increased communication among service requestors, contract writers and service providers. Present mechanisms are being revised and need to be further improved to insure that:

- (1) The service being requested is the one that is really needed.
- (2) The service requested can be and is obtained.
- (3) The service can be and is provided by the appropriate agency.
- (4) Service is provided with a minimum of disruption to the agency's other service efforts and existing clientele.

c. Implementation:

Review of Maine's Child Welfare Services program indicated some administrative deficiencies. One is the lack of a systematic, periodic review of open child welfare cases. There are essentially three types of review systems: internal administrative, external non-judicial, and judicial. Under the new Child and Family Services Act, a judicial review will be required within 18 months of a final protection order. Implementation of an internal administrative or external non-judicial

(See IV-14)

(See IV-14)

review can facilitate movement toward time limited case decisions. It can also provide a check on both adherence to Department policies and procedures, and at a higher level, the appropriateness of the policies and procedures themselves.

(See IV-9) There is considerable support for the development of both administrative and external review, for at least some client groups. The new Federal law, H.R. 3434, specifies that children in foster care must receive a review every 6 months by either "a court of competent jurisdiction or an administrative review." Maine needs to develop the mechanism to fill this gap.

(See IV-8)

(See IV-5)

The second major gap in program implementation is the lack of an organized, consistent, centrally located policy manual for child welfare services. Considerable policy does exist. However, some parts of it conflict with others. There are gaps in other parts. Further, child welfare policy is presently issued in the form of Approved Policy Statements. Using this process mixes policy with other, non-child welfare policy, making it hard to find. Child Welfare policy needs to be drawn together under a single, clearly organized cover.

A third gap is in implementation of the Indian Child Welfare Act. Maine has a small Indian population (about 3,500). While Indian families make up only about 1% of the referrals statewide, they make up one of the larger ethnic groups served. The Act requires specialized procedures in protective services, placement, and adoption and provides a basis for expansion of Indian Child Welfare services. While Maine has complied with the law in individual cases it needs to set up administrative mechanisms which will insure routine compliance.*

A fourth point where there are problems is the broad area of staff selection and development. Review of the selection process indicates that the present qualifications for child welfare workers do not consistently identify the most qualified individuals. Current minimum qualifications and testing devices do not specifically address requisite skills and knowledge for child welfare positions. Training for child welfare staff has been a priority and there has been an increase in the range and availability of training programs. However, there is no <u>statewide</u> orientation and ongoing training program which consistently prepares and enhances the abilities of all child welfare workers and supervisors to perform their jobs. Further, standards for

24.

^{*}One aspect of providing effective child welfare services to the Indian population is employment of Indians by the agency. The Department of Personnel has an ongoing recruitment effort for all minority groups for state positions. Indian groups are notified of openings in the Department through organizations such as the Central Maine Indian Association, the Aroostook Association of Indians, and the Advanced Native American Studies Program at the University of Maine in Orono.

It is not possible to identify the full number of Indians employed by the Department since this information is provided at the discretion of the employee. Affirmative Action Office records show no Indian employees, although staff have identified at least one Native American worker.

specifying and measuring job expectations have varied between regions and units. These problems have led to much confusion and frustration among agency staff. This is illustrated by staff turnover, which is estimated to be about 1/3 per year.

(See IV-7)

These problems have been partially addressed through a contract with the New England Resource Center, in collaboration with the Department of Human Services and Department of Personnel staff. Follow through on the work that has been started is essential.

One of the responsibilities of the Department is to monitor quality of board and care provided to children outside their own homes. Other branches of government monitor the quality of education provided to children outside their homes (Department of Education), and the quality of therapeutic treatment provided (Department of Mental Health and Corrections). Of the 60-65 group and residential care facilities in Maine, many offer more than one of these services under one roof and thereby come under the jurisdiction of more than one agency.

The problem with this division of labor has been that each Department has had at least one (sometimes several) separate licensing processes. These processes have been uncoordinated and have complicated the administration of services for the Departments and the facilities. The processes have led to seprate licensing requirements which are unclear and unstandardized. The requirements have been based on statutory responsibilities and administrative roles that have been unclear and sometimes duplicative.*

This confusion has led to lack of accountability on the part of the facilities, and since the Department hasn't been sure about what has been going on "out there", the development of facilities tailored to clearly identified, unmet client needs has been very difficult. Maine needs a carefully designed, tri-departmental licensing process for the residential care facilities providing services to children.

Also in the area of licensing, the Department must move quickly to bring itself into compliance with the new Federal Day Care Regulations. Maine has made special effort to maintain compliance with the old FIDCR regulations. Therefore, it has identified only two areas where it needs to take special initiatives: establishment of a day care advisory committee, and comprehensive training for day care providers.

Finally, DHS has identified several individual areas where it is not in compliance with the assurances described in 45 CFR, Part 220. Lack of compliance in some areas has contributed to problems described above under specific target groups or support services areas. A few individual, isolated problems areas, not yet referred to are listed below:

(See |V-11)

(See IV-4)

^{*}Ludwig, Stephen B. "Proposal for Development of Tri-Departmental Licensing System" June, 1979, p. 2.

(See IV-1)		(1) Single Organizational Unit - While, the Bureau of Resource Development constitutes the single unit required by the Assurances this has not been sufficiently documented. Supporting documentation needs to be submitted to the regional office of the Children's Bureau.
(See V-2)		(2) Child Welfare Advisory Committee - Although Maine does have several advisory committees, none performs the responsibilities set forth in the Assurances. Maine needs to identify the most appropriate way to fulfill this obligation.
(See IV-4)		(3) Day Care Advisory Committee - Maine has had a committee of this type in the past; it does not now; it needs to establish one in the immediate future.
(See V-3)		 (4) Client Grievance Procedures - No formal mechanism exists for notifying child welfare clients of their right to appeal DHS service decisions. (5) Use of Volunteers - Maine uses some volunteers in child
(See IV-6)		welfare services. However, it is not clear whether optimal use is being made of them, given Maine's resources. Maine fails to comply with the Assurances in that the agency does not employ a statewide volunteer coordinator. This area needs comprehensive analysis and a plan for further action.
	d.	Monitoring:
		Maine has extensive data available to it, as the comprehensive

Maine has extensive data available to it, as the comprehensive nature of this year's needs analysis suggests. However, there are some gaps in our ability to monitor clients and services. First, the historical data kept on clients is not sufficient to track individual progress over a long period of time, in a way that is desired by program staff. This may be desirable, particularly in the case of foster children. Second, it is not possible to consistently, accurately identify which purchased services, and how much of them, child welfare clients receive as part of a child welfare case plan. Third, the outcome data that can be inferred through the present system is not specific enough for the needs of the program. Thus, improvements need to be made in the data base available to the program.

e. Evaluation:

(See |V-10)

Considerable strides have been made this year in connecting proposed evaluation studies with the program needs of the program. No major problems have been identified here except that staff resources are too limited to carry out extensive evaluation efforts.

26.

SUMMARY OF IDENTIFIED SERVICE/PROGRAM NEEDS

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	TARGET GROUP	NEED	NEED NOT ADDRESSED IN PLAN	NEED ADDRESSED	APPLICABLE OBJECTIVE
	Children in Care	CLIENTS SERVED: Children taken into the care or custody of the Department need to fall into the narrow confines of Maine law.		Х	11-1
		IN-HOUSE SERVICES: A concerted, Department wide emphasis is needed to attain the best permanent placement for each child.		Х	-1 -2 -3
		PURCHASED SERVICES: The state must establish fair, equitable reimbursement processes for residential services		Х	11-2
		The Department needs to complete a foster home recruitment effort, coordinated state- wide, but targeted to regional needs.		Х	I V-12
		The Department needs to establish additional, appropriate exit options for adolescents.		Х	11-3
-		Foster parents need better training.		х	I V-13
-		Foster parents need more money for room and board.	X		
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SUMMARY OF IDENTIFIED SERVICE/PROGRAM NEEDS

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TARGET GROUP	NEED	NEED NOT ADDRESSED IN PLAN	NEED ADDRESSED	APPLICABLE OBJECTIVE
Children in Jeopardy	<u>CLIENTS SERVED</u> : The Department should strive to broaden the segment of the population to whom it provides child abuse and neglect case studies.	X		
	IN-HOUSE SERVICES: The Department needs to help other agencies clarify their roles and responsibilities in reporting, investigating and treating abuse and neglect.		X	
	The Department needs to determine quality and effectiveness of its case assessment process, on a statewide basis.		x	-1
	More information is needed about the effect of casework services on referrals accepted for services.	×		
	Analysis of actual workload sizes and level of compliance with caseload size standards, needs to be completed.		x	111-5
-	Greater clarity and uniformity is needed within the Department's system about which cases are appropriate to take to court.		X	111-3
	PURCHASED SERVICES: More purchased services are needed to support day care, homemaker, housing, mental health, transportation and nutrition.		x	IV-14

SUMMARY OF IDENTIFIED SERVICE/PROGRAM NEEDS

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	TARGET GROUP	NEED	NEED NOT ADDRESSED IN PLAN	NEED ADDRESSED	APPLICABLE OBJECTIVE
And the second se	Families at Risk	<u>CLIENTS SERVED</u> : Maine needs to considerably expand the types of clients "at risk", which are offered services.	x		
Name of the second s	r	IN-HOUSE SERVICES: The Department needs to know more about the costs and effects of the court studies program, compared to other, pressing service needs.		X	111-4
T.	• •	<u>PURCHASED SERVICES</u> : With new groups to be served, a comprehensive approach to client need, incorporating both in-house and purchased services, must be created.	x		
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SUMMARY OF IDENTIFIED SERVICE/PROGRAM NEEDS

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TARGET GROUP	NEED	NEED NOT ADDRESSED IN PLAN	NEED ADDRESSED	APPLICABLE OBJECTIVE
Support Services	PLANNING: A cost effectve needs assessment process is needed to document in greater detail the type and size of purchased service need.		х	IV-14
	RESOURCE DEVELOPMENT: The Department needs to develop mechanisms which will facilitate transfer of Title XX funds to address the need of child welfare clients.		х	. IV-14 -
	IMPLEMENTATION: The Department needs a systematic, periodic review of open child welfare cases.		Х	IV-9
	The Department needs an organized, consistent, centrally located policy manual for child welfare services.		х	I V-8
	DHS needs to meet the requirements of the Indian Child Welfare Act.		х	I V-5
	Staff selection, orientation and performance standards need to be upgraded.		х	I V-7
	A tri-departmental licensing process needs to be established for the residential care faci- lities providing services to children.		X	IV-11
	The Department needs to document the existance of a single organizational unit.		х	I V- 1
	The Department needs to identify the most appropriate method for establishing a Child Welfare Advisory Committee.		х	I V-2
	The Department needs to establish a Day Care Advisory Committee.		Х	IV-4
	The Department must establish a formal mecha- nism for notifying child welfare clients of their right to appeal service decisions.		X	I V-3
	Maine needs to determine the optimal use of volunteers.		Х	IV-6
	MONITORING: DHS needs to improve its informa- tion gathering capacity in order to better track client orogress, identify use of purchase services by child welfare clients, and measure effect of service on the client populations.	d	X	IV-10

C. Status Report

The previous section of this report provides an extensive description of many aspects of Maine's Child Welfare program which need improvement. This is consistent with the Department's ongoing effort to improve it's ability to respond to client need. However, to examine the needs in Maine without acknowledging the current positive aspects of the program severely limits the perspective of this document.

Further CWS plans will provide a forum for this perspective by allowing states to report on the status of last year's objectives. Action oriented objectives were not required or established last year and thus a status report is not required as part of this year's plan. Nevertheless, Maine has chosen to provide a status report on its work during the current fiscal year. This will balance the section above, and provide the reader with knowledge required to fully understand the goals and objectives established in the following section.

PLANNING:

1. Foster Care Task Force Development:

In the summer of 1979 an application was filed with ACYF for a grant to establish a citizen-agency task force to assess Maine's Foster Family Services System. At about the same time the Human Services Development Institute (HSDI) of the University of Southern Maine, applied for a Leadership Training Grant. Both grants were awarded and the Leadership Training Grant was merged with the Task Force work. Under this auspice, HSDI has conducted a comprehensive survey of the various components of the foster family services system. These results have proved invaluable in DHS planning efforts this year. The findings are expected to produce a series of recommendations for statutory, administrative and policy changes in September, 1980. It is hoped that the public information produced by the Task Force report will build a constituency to support meeting the critical needs of children and families.

2. Planning Committee:

A second significant development in planning has been the establishment of the Child and Family Services Planning Committee. This group is referred to in the forward of this document. It includes a variety of social service professionals, and has enabled the Department to take a more comprehensive look at the service needs of child welfare clients. It has also fostered the development of more constructive working relationships among the various parts of the organization.

RESOURCE DEVELOPMENT:

1. Title XX Service Expansion:

Efforts have also been made for child welfare clients to obtain more services. A clause has been included in purchase of service contracts

starting July 1. 1980. It provides that clients referred by the Department of Human Services will be given priority for purchased services. This is a first step toward more systematic, expanded use of Title XX services by this group. At the same time, linkages have been developed between in-house and contractual services staff to better identify problems and barriers to service delivery so that they can be corrected at contract negotiations time.

2. Foster Home Recruitment:

During 1979-80 the Division of Licensing within the Bureau of Resource Development has been developing a statewide foster home recruitment plan. This plan is the first coordinated, statewide effort to locate and license foster homes. However, while it will be a statewide effort, there will be some regional variations. Regions are identifying their individual needs and designing activities to develop homes that will fill gaps in available resources. The Divisions hopes to build a large reserve of homes for children for whom there is the greatest need, and move away from the licensing after placement process that has traditionally existed in the Department.

IMPLEMENTATION:

1. Reorganization/Expansion of Bureau of Resource Development Services to Children and Families:

In September, 1979, the Bureau of Resource Development was reorganized. As part of that reorganization the Division of Child and Family Services was created and three additional lines allocated to it: the Director, one additional substitute care specialist, and one additional protective services specialist. In addition the Director of the Bureau of Resource Development created a Management Team comprised of Bureau Director and Deputy plus Division Directors. Weekly meetings of the Management Team contribute to coordination and communication between the Division of Child and Family Services and other Divisions.

2. New Child Welfare Law:

One of the most significant products resulting from nearly three years' effort is the recodification of the Child Welfare Laws which becomes effective July 3, 1980. This recodification of the laws has produced a single, well organized, non-conflicting, set of laws out of disjointed, conflicting laws which had been developed piecemeal over the years. Policy is being written to implement the new laws and a plan for organizing the range of child welfare policies has been developed for implementation over the coming year.

3. Increased Emphasis on Adoption:

In addition, a central office and regional staff committee has nearly completed a full revision of adoption policy, procedures and forms to be incorporated in the planned Child and Family Services Policy Manual.

4. EPSDT Program Changes:

A joint agreement for the EPSDT program between the Division of Child and Family Services and the Division of Child Health has resulted in policy and procedures for the delivery of those services.

5. Changes in the Residential and Group Care Systems:

Under a charge from the Commissioners of the Departments of Mental Health and Corrections, Education and Cultural Services, and Human Services a tri-departmental Residential and Group Care Committee developed a workplan in November, 1979 to be completed in large part by October, 1980. The goal of this committee is to attain "development and implementation of tri-departmental system of residential and group care for children with specification of client target groups, objectives, needs assessment, service delivery system, and administrative supports" (Residential and Group Care Committee Work Plan). Toward this goal, a Residential Placement Review Committee .. is assessing needs and resources and developing procedures for reviewing residential and group home placements. A resource development procedure including a pre-application consultation package, an application package, and a joint contract has been developed. A set of cost accounting and rate setting procedures including principles of reimbursement have been developed and scheduled for public hearing, in preparation for implementation during the summer and fall and to provide the basis for a legislative budget request. Department of Human Services residential placement policy is near completion and will be followed by complementary placement policies from the other two state departments. Finally, a tri-departmental licensure effort has been initiated which will result in the development of a legislative bill to provide a statutory base for tri-departmental licensure of residential child care facilities, and the subsequent development of appropriate related procedures.

As in the Child and Family Services planning effort, the process has been valuable since it has built inter-departmental working relationships to enhance future cooperative efforts.

6. Indian Child Welfare Act Compliance:

Work has been initiated with the Indian tribes in Maine which will result in the development of joint agreements and policy for the implementation of the Indian Child Welfare Law in Maine. With the assistance of an Assistant Attorney General, staff have been in compliance with the Indian Child Welfare Act for individual children properly identified as Indians.

7. Personnel System Improvements:

Functional job analysis job descriptions have been developed for service delivery staff. That package of job descriptions is being presented to the Department of Personnel. Complementary to that, and in conjunction with the Department of Personnel, draft performance standards have been developed for substitute care and protective staff and for children's services managers. These will be completed and put into effect during the next year. In addition, standards for interviewing and hiring job applicants and job entry requirements are being developed.

8. Staff Training Plan:

A plan for staff training has been developed and is being implemented with heavy concentration on policy training, on training to support permanency planning efforts, and on training of managers, both in supervisory skills and in content. The plan was developed out of an extensive staff training needs assessment.

9. Sample Case Review/Consultation:

Additional Division of Child and Family Services staff has allowed the completion of an administrative case review of a selected sample of forty children statewide as well as regularly scheduled regional office visits for program and case specific consultation in substitute care.

10. Region IV Intake and Case Management System

During the current year a consulting firm has been helping administrators in one region to develop a method to track cases referred for protective service, and ensure timely case movement and decision making. This 40 day technology transfer grant is intended to produce both a conceptual design, and a detailed design. These designs should provide a framework for analysis of intake, assessment, and case management procedures statewide, and produce a model that can be applied statewide.

MONITORING:

1. Information System Improvements:

A task force of administrative and field staff has worked over the last year to improve the information systems. A procedural policy has been established for changing the information systems themselves. Title XX Federal goals have been defined. Service elements have been redefined. A single non-conflicting, non-duplicative list of target groups and client objectives has been developed for the in-house and purchase system. The data elements for the facesheet have been redefined. A work plan for other improvements in the information systems has been developed.

EVALUATION:

1. The Bureau of Resource Development is presently examining the cost effectiveness and impact of 4 therapeutic foster home systems in Maine This two phase study began with an analysis of the similarities and differences among the four programs. This phase will be completed in July, 1980. A second phase, tracking client progress, will begin in July and continue for one year. The findings will be used to purchase service in a more informal way in the next fiscal year.

Thus, significant work has been done during the current fiscal year. It has laid the groundwork to enable the Department to identify the needs above and take the initiatives described below.

D. 1980-81 GOALS AND OBJECTIVES

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Development and implementation of a permanency planning project for children in the custody of the Department of Human Services; the project will emphasize early placement in the best possible alternative for the child.

JUSTIFICATION AND APPROACH

The Department acknowledges that many children in foster care in Maine have tended to drift without systematic, concerted efforts to establish permanent placements for them. This problem is well documented. It affects the lives of literally thousands of children. Strong support for changes exist at all levels of the Department.

Steps taken recently within the Department make significant progress possible. First, Governor Brennan signed the new Child and Family Services and Child Protective Act into law on April 3, 1980. Among other things this provides Maine with a Termination of Parental Rights law. Second, within the past year a substitute care consultant was hired to, in part, develop, implement and monitor a Permanency Planning Project. Third, it appears likely that there will be $l\frac{1}{2}$ new legal positions filled in the near future to specifically address child welfare cases and expedite legal decisions pertaining to them.

Attainment of this goal will be reached through a combination of staff training, supervision, technical assistance, monitoring, and evaluation. These areas are decsribed in the objectives below.

This goal represents a short term effort in moving the Department toward permanent placement for all foster children in the most appropriate situation. The Department has begun by identifying a group of 500 or so children who have drifted in care and who are likely to continue to do so. These children will be the recipients of special effort, careful study as the agency seeks to establish permanent placement for them.

The knowledge and experience gained with this group of children in the next several months will prepare the agency for further efforts. Department goals in future years will expand the scope of the permanency planning effort to the entire foster care population.

OBJECTIVE #1:

To provide comprehensive training to 75% of the present child welfare workers in each region, covering the skills to implement permanency planning.

Completion Date: 6/30/81

NARRATIVE STATEMENT:

Significant Actions Taken to Date:

- . Major training needs of staff have been identified
- . Fiscal resources have been allocated
- . Some training in (a) supervision in permanency planning, and (b) casework skills has been provided

Next Steps:

- . Determine/develop remaining training content
- . Locate, schedule trainers (NERC, SETU, staff)
- . Implement training
- . Obtain feedback and evaluate achievement of training objectives

OBJECTIVE #2:

To provide ongoing monitoring and technical assistance to permanency planning workers and supervisors in all 5 regions.

Completion Date: 8/31/81

NARRATIVE STATEMENT:

Significant Actions Taken to Date:

- . Selection of client target population
- . Initial contacts have been made with regional staff
- . Some supervision is now provided, though not in a systematic way

- . Design, development by each regional office of procedure for implementing principles of permanency planning
- . At least monthly consultative visits to each office by statewide permanency planning coordinator
- . Establishment of a periodic random sample case review (to be meshed eventually with the broader case review system)
- . Provision of outside consultation as required

38.

OBJECTIVE #3:

To complete a formal evaluation of DHS progress toward permanency planning.

Completion Date: 12/31/81

NARRATIVE STATEMENT:

Significant Actions Taken to Date:

. Key aspects of program performance to examine have been identified

- . Specify evaluation methodology in full detail
- . Establish client related numerical performance standards for: number of case plans established, implemented; number of adoptions, return home, discharged self-sufficient, etc.
- . Develop necessary information gathering procedures
- . Collect data
- . Analyze data
- . Prepare findings

Development of a more comprehensive DHS approach to the special needs of adolescents requiring supervision and care.

JUSTIFICATION AND APPROACH:

Adolescents have been identified as being an especially difficult, troubled segment of the foster care population. As such, they require specialized services - many of which the Department has not developed fully.

The Department's broad goals for adolescents are not substantially different from other foster children. However, because the objectives are specialized, they are presented separately.

The approach will be to carefully define the circumstances under which children should come into the care of the Department, make significant administrative changes so that adolescents in care can be assured of receiving needed residential services, and establish appropriate, needed placement resources for adolescents.

This goal encompasses a relatively narrow, short term strategy in relation to adolescents. It calls for restriction of the population served and emphasis on developing ways to better serve this limited population.

At the same time the Department recognizes the broad nature of the needs of adolescents. Many of the initiatives elsewhere in this plan impact significantly on adolescents, not as a special population, but as part of the larger group of Child Welfare Program clients. Several ongoing inter-Departmental activities in which this Department is participating address the needs of this group. Thus, this goal should not be viewed as encompassing the agency's entire initiative in relation to these children.

OBJECTIVE #1

To implement policy/guidelines for accepting custody of adolescents.

Completion Date: 9/30/82

NARRATIVE STATEMENT:

Significant Actions Taken to Date:

. Types of adolescents inappropriately committed have been tentatively identified

Next Steps:

- . Develop strategies to respond to gaps
- . Implement strategies
- . Develop clear, public statement regarding DHS responsibility
- . Develop policy/guidelines for receiving adolescents in care
- and provision of service
- . Monitor compliance with guidelines

OBJECTIVE #2

To implement the Residential and Group Care Committee Plan.

Completion Date: 6/30/81

NARRATIVE STATEMENT:

Significant Actions Taken to Date:

By the Residential and Group Care Committee

- . Development of a clear process for application for funding of residential treatment programs
- . Development of a set of cost accounting and rate setting procedures with rates of reimbursement

- . Finalize tri-Departmental residential placement policy
- . Finalize monitoring system for placement needs, cost
- . Establish appropriate rates
- . Based on findings prepare legislative budget request

To formally establish appropriate exit options from foster care for adolescents, in addition to adoption and return home.

Completion Date: 9/30/82

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Study current alternatives to adoption and return home
- . Identify those that are positive alternatives, including costs, benefits
- . Develop policy and procedures to support solutions
- . Develop resources that will be required

Assessment and improvement of the Department's protective/preventive service delivery strategy in child abuse and neglect situations.

JUSTIFICATION AND APPROACH:

This goal combines the initiatives identified by the Department for the next year for both the Children in Jeopardy and the Children at Risk, and their families. However, in this next year, with limited resources and given the Department's legal mandate, initiatives must be taken primarily in terms of those children about whom the Department has received a protective referral.

The broad purpose of service to these children and families is to improve their functioning - to prevent the children from coming into foster care. The objectives below represent <u>beginning</u> steps toward increasing the Department's capacity to do this. Interagency agreements help provide earlier detection, earlier treatment of abuse or neglect. Clearer criteria for court action prevents less serious cases from coming to court. A better understanding of the intake and assessment process, the court studies program, and caseload characteristics is essential in identifying improvements needed here. Future goals will reflect these next steps.

OBJECTIVE #1

To conduct a comprehensive analysis of the quality and effectiveness of the Department's protective case study service.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Obtained consensus among key staff that this is an important area to examine in detail.

Next Steps:

- . Identify the specific questions that are both important and possible to answer
- . Develop methodology
- . Gather data
- . Review/analyze data
- . Develop work plan for improvement

OBJECTIVE #2

To develop 4 interagency agreements between Division of Child and Family Services and other agencies regarding reporting, investigating, and treating cases of child abuse and neglect.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Identification of key agencies with which to develop agreements: Alcohol and Drug Abuse service providers; juvenile intake program; public health nursing program; venereal disease control program; local district attorneys.

- . Prioritize agreements to be completed
- . With each agency, identify key areas which require resolution
- . Negotiate appropriate roles and responsibilities
- . Develop appropriate in-house policy
- . Implement agreements
- . Monitor compliance and revise agreement as appropriate

To implement criteria and procedures which ensure appropriate petitioning for custody of children in jeopardy.

Completion Date: 9/30/82

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Development of policy and procedures required by new State Child Welfare law.

Next Steps:

- . Identify policy and procedure areas that require greater specificity
 - . Develop specific criteria, procedures
 - . Train Staff
 - . Develop strategy with AAG to monitor compliance
 - . Monitor compliance
 - . Identify problem areas
 - . Take Corrective action

OBJECTIVE #4

To evaluate the court studies program to determine the costs and effects of the service.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Obtained consensus among key staff that this is an appropriate area for in-depth analysis.

- . Identify the specific questions that are both important and possible to answer
- . Develop methodology
- . Gather data
- . Review/analyze data
- . Develop work plan for appropriate changes

To complete an analysis of caseload sizes, including the effect administrative leaves have on the number of cases a worker must handle.

Completion Date: 12/1/80

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Identification of caseload size as a key issue for in-depth analysis

- . Specify in detail the scope, methodology of the study . Implement methodology
- . Analyze data
- Develop work plan for changes or additional resources

Improvement of the Department's administrative systems to support broad new and ongoing service initiatives.

JUSTIFICATION AND APPROACH:

This goal is best understood as a broad umbrella which covers a variety of program wide administrative initiatives. These initiatives cut across and affect all of the target groups served by the child welfare program. Consequently, they are identified separately. There are three categories of objectives. The first, encompassing objectives 1 through 6, includes those initiatives taken primarily to bring Maine into compliance with federal regulations (Title IV-B regulations, Indian Child Welfare Act requirements, the new Federal Day Care Requirements). While the actions taken may have important consequences for in-house or purchased services, they have been selected primarily in response to Federal expectations. Second are the improvements needed in in-house policies and procedures (objectives 7 through 10). Third, are the improvements needed in the administration of purchased services (objectives 11 through 14).

One of the most important initiatives of all is the final one, which calls for greater access to Title XX dollars for in-house clients. The entire nature of Child Welfare Services in Maine will be changed as this objective is substantially achieved.

Future administrative support goals will build on the achievement of the objectives listed below.

47.

GOAL #4

COMPLIANCE INITIATIVES

OBJECTIVE #1

To document the existance of a single organizational unit which administers the child welfare program.

Completion Date: 9/30/80

NARRATIVE STATEMENT:

Significant Steps Taken to Date

. Identification of need to provide additional documentation to regional office of Children's Bureau on Maine's single organizational unit.

Next Step:

. Completion, presentation of documentation of existance of single organizational unit.

OBJECTIVE #2

To determine optimal structure and functions of a child welfare advisory group.

Completion Date: 3/31/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Identification of this area as one where Maine is out of compliance with 45 CFR, Part 220.

Next Steps:

- . Review present utilization
- . Identify present and potential contributions of present program
- . Identify issues and options for change in present system
- . Decide further steps

OBJECTIVE #3

Implement a grievance procedure for client appeal of service decisions made of DHS workers.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Establishment of a grievance procedure for purchase of service clients.

Next Steps:

- . Review present procedure and regulations
- . Determine revision required to expand to child welfare clients
- . Develop policy revisions and procedures
- . Train workers
- . Implement procedures
- . Monitor compliance

OBJECTIVE #4

To maintain continued compliance of Maine day care homes and facilities with current federal regulations.

Completion Date: 4/1/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Comprehensive review of new Federal Day Care Regulations
- . Attendance at Federal regulation orientation session

Next Steps:

- . Creation of Day Care Advisory Committee
- . Establishment of ongoing training of day care providers

OBJECTIVE #5

To implement the requirements of the Indian Child Welfare Act.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

With the assistance of the Attorney General's office, individual cases have been handled in compliance with the Indian Child Welfare Act
Necessary steps have been identified which will expand and formalize existing relationships with local Indian tribes Next Steps:

- . Obtain service agreements with tribes
- . Write policy for DHS staff regarding protective service placements, adoption of Indian children
- . Train staff
- . Develop a system of ongoing legal service and program consultation
- . Implement system
- . Monitor system

OBJECTIVE #6

To determine optimal use of volunteers.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Identification of this area as one where Maine is out of compliance with 45 CFR, Part 220.

Next Steps:

- . Review present use
- . Identify contributions of present program
- . Identify issues and options concerning expansion of present use
- . Determine future steps with each category

IN-HOUSE POLICY, PROCEDURAL IMPROVEMENTS

OBJECTIVE #7

Formally revise key specific aspects of the personnel hiring/staff development process: minimum entry standards; performance standards; temporary status staff training.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Development of FJA job descriptions
- . Initial development of classification/qualifications/pay ranges appropriate to Child Welfare staff positions
- . Development of draft statewide performance standards for child welfare workers
- . Completion of an outline of an orientation training package for new workers covering the first 12-18 months of employment.

Next Steps:

- . Implement classifications for workers
- . Finalize performance standards
- . Train staff in use of standards
- . Implement standards
- . Develop complete orientation/training package for new workers
- . Implement training

OBJECTIVE #8

To develop a comprehensive child welfare policy/procedures manual.

Completion Date: 3/31/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Initiation of policy development for the new Maine Child Welfare law
- . Development of a plan for organizing the full range of existing and needed child welfare policy
- Next Steps:
 - . Complete listing of policy gaps
 - . Development of policy in each area
 - . Dissemination of policy manual

OBJECTIVE #9

To implement a 100% case review system which specifies semiannual review of all substitute care cases who have been in care at least 6 months.

Completion Date: 3/31/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. An independent case review has been conducted on a small sample of child welfare cases, suggesting appropriate approaches to an ongoing case review system

- . Review alternative methods of case review, including use of volunteers
- . Determine resources available for implementing review system
- . Decide on optimal plan, given resources
- . Train workers and reviewers
- . Implement plan
- . Document steps to implement changes based on case review findings

Develop a client tracking system which maintains a record of key service provision and effect from referral to dismissal.

Completion Date: 9/30/82

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Formation of a task force of administrative and field staff to improve the information system
- . Development of a procedural policy for system change
- . Identification of several specific changes needed

Next Steps:

- . Finalize system requirements
- . Examine connections between manual and computerized systems
- . Identify additional changes required
- . Determine feasibility of changes
- . Make changes consistent with overall information system
- . Develop training plan
- . Develop system of monitoring quality of data input

PURCHASE OF SERVICE ADMINISTRATIVE INITIATIVES

OBJECTIVE #11

To establish a tri-departmental licensing process for the residential care facilities providing services to children.

Completion Date: 6/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Formation of the Joint Licensing Task Group
- . Identification of types of facilities to be addressed; universal definitions of types
- . Development of a detailed work plan for objective completion
- . Employment of staff to carry out major functions

- . Develop statutory base for tri-departmental licensure
- . Develop total licensing requirements for each type of facility
- . Develop joint licensing process

- Coordination of licensing process with related management mechanism; specify statutory changes and draft appropriate legislation
 Field test
- . Implement process

To implement a statewide, targeted recruitment plan for foster homes.

Completion Date: 6/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

. Establishment, implementation of mechanism for coordinating a statewide recruitment plan.

Next Steps:

- . Identify on a region by region basis, the gaps in foster home resources available for children
- . Develop a regional strategy to fill these gaps
- . Implement strategy

OBJECTIVE #13

To implement a statewide, coordinated training program for foster families, including orientation of prospective and newly licensed foster families, and ongoing foster parent training.

Completion Date: 4/1/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Implementation of individual regional orientation programs
- . Pilot testing of ongoing foster parent training in some regions

- . Assess in detail what is being done, what needs to be done by region
- . Establish learning objectives (informally for orientation of potential and new foster parents; formally, by regional staff and SETU for ongoing training)
- . Establish appropriate training programs
- . Conduct training
- . Evaluate training programs (informally for orientations; formally, in terms of learning objectives with ongoing parent training)

Develop a comprehensive approach to access to Title XX purchased services for child welfare clients.

Completion Date: 9/30/81

NARRATIVE STATEMENT:

Significant Steps Taken to Date:

- . Data obtained through the "Title XX Protective Services Utilization Study" identified key gaps information available
- . Planning Committee work has identified some possible needs assessment strategies, and important issues to consider in a needs identification system.

- . Develop unmet needs identification system to justify requests
- . Prioritize service needs
- . Prepare/present list of needs in conjunction with Division of Contractual Services staff
- . Purchase priority services based on available resources
- . Develop mechansm for ongoing region/provider/Bureau communication about appropriateness of services

E. NEEDS THAT WILL NOT BE ADDRESSED

Maine intends to address in some fashion virtually all the program needs it has identified, as indicated in the above chart. A few problem areas will not be addressed, <u>or</u> are areas where a course of action has simply not been decided upon in great enough detail to commit to a plan. Where the Department has chosen not to address a need, the overriding reason is generally lack of resources. The Department has identified so many important initiatives that some things were excluded through lack of available resources.

Children in Care

Increase board rate for foster families: This is a critical need. It is also almost entirely a fiscal issue to be dealt with in the legislature. A strategy for dealing with this issue has not been finalized, but is under consideration by the Governor's Task Force on Foster Care. The final strategy will be supported by the Department.

Children in Jeopardy

Broadening of population to whom we provide abuse and neglect case studies: This is a difficult area. While the Department has a desire and a mandate to protect all children, it is virtually overwhelmed now by abuse and neglect complaints and referrals. There is little incentive to aggressively seek out new referrals.

At the same time the Department does have, and will continue to offer a small public education service. Through this service, staff and consultants speak to civic groups, schools and other organizations about the problems of child abuse and neglect, including referral procedures. The state liaison to the New England Regional Center for Child Protective Services has done a great deal of training to persons mandated by law to report child abuse and neglect.

More information about the effect of Department services on validated cases of abuse and neglect: There will be no comprehensive effort to assess service effect this year. This omission is also a matter of lack of resources Division of Evaluation and Planning staff would be heavily involved in such an evaluation. However, this group has identified ten other major projects that it will be completing in the next year for child and family services. These initiatives can be found at various points in the plan.

It is anticipated that some initial information about this area will be available through proposed information system changes. This data will help target a more in-depth analysis at another time.

Children at Risk

Expansion of those clients "at risk" who need service, and,

Comprehensive approach to use of both in-house and purchased services for this group:

It is acknowledged that it is better to prevent abuse and neglect than to attempt to deal with it once it has happened. The Department is interested in expanding its range of both clients and services in response to this fact. However, it cannot be done in the coming year, and it should not be done at the expense of existing mandated responsibilities. In the coming year Maine will be weighing a variety of approaches to the addition of client groups. However, it is not now possible to specify an approach, or even project how much effort can be expended on this.

F. CONCLUDING NOTE

The above goals and objectives represent an ambitious plan for program improvement over the next two years in Maine. To a large extent, the target dates for completion reflect a prioritization of effort. Those objectives expected to be completed by September 30, 1981 are of highest priority. Those objectives to be completed by September 30, 1981 are slightly less critical improvements, and are reluctantly being pushed back a year. Changes in the funds available to Maine in the coming year would affect completion of the objectives. One way in which the objectives might be affected concerns date of completion. Allocation of new, unexpected resources could result in completion of 1982 objectives at an earlier date. Failure of some expected revenues to materialize would push back completion of some 1981 objectives.

Another way in which Maine might adjust is through level of completeness with which objectives are addressed. For example, an unexpected increase in funds might result in a more thorough, frequent case review process, or expanded training in an important area. In short, this year's initiatives have been developed based on an anticipated level of funding. Substantial changes in funding levels would require further, careful examination of the source of funding and progress to date in all established objectives. VI. ANNUAL SUMMARY OF CHILD WELFARE SERVICES

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VII. ANNUAL BUDGET REQUEST

Office of Human Development Services Administration for Children, Youth, and Families Children's Bureau

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VIII. GOVERNOR'S A-95 REVIEW

I hereby certify that the requirements for review of the State Child Welfare Services Plan as contained in OMB Circular A-95 have been met as indicated below.

- A-95 Clearinghouse comments attached
- Governor's signature is provided on the State Plan

X State Plan was sent to A-95 Clearinghouse for review on 7/9/80 and comments are expected by 8/15/80 .

(date)

Michael R. Petit, Commissioner Department of Human Services

all

Peter E. Walsh, Director Bureau of Resource Development