Statement of Consideration (SOC)

PPTL 21-19 SOP 2.15, 2.15.2, 2.15.3, 2.15.9, and the CPS Investigative Distribution Chart. The following comments were received in response to SOP drafts sent for field review. Thanks to those who reviewed and commented. Comments about typographical and grammatical errors are excluded; these errors have been corrected as appropriate.

**SOP 2.15.9**

1. **Comment**: We would like to see a notification of findings sent to the parents/legal guardian when we confirm or do not confirm on the findings of Human Trafficking involving non-caretakers.  We think the Parents/Guardians should receive notification of these findings.

**Response:** Currently, for confirmed or not confirmed for non-caretakers, no letters are sent because the perpetrator’s name does not go on the central registry. Non-caretaker perpetrators do not have due process to appeal the finding and, therefore, a notification template has not been created. Language will be added under Contingencies and Clarifications to indicate that the SSW can inform the parent/guardian verbally or in writing on agency letterhead by drafting a brief letter regarding the finding. Contents of the letter should be decided on a case by case basis.

**SOP 2.15**

1. **Comment: 16.** Completes the following tasks if other children are interviewed as collaterals:
   * + 1. Obtains the parent’s permission, if possible;
       2. Informs the parent as soon as possible after the interview if the parent is not contacted prior to the interview;
       3. Explains to the parent/guardian that his/her child is not the alleged victim; and
       4. Determines in conjunction with the FSOS and child’s parent(s)/guardian an appropriate place to interview the child.

The above says parent. Can we notify workers if DCBS has custody.  Could this specify.

**Response:** Change is made.

1. Obtains the parent/guardian’s permission, ~~if possible~~;
2. ~~Informs the parent as soon as possible after the interview if the parent is not contacted prior to the interview;~~
3. Explains to the parent/guardian that his/her child is not the alleged victim; and
4. Determines in conjunction with the FSOS and child’s parent(s)/guardian an appropriate place to interview the child.
5. **Comment: 37. Submits the assessment to the SRA, or designee, for review, when completed.** 
   1. **THe sRA or designee should conduct at least one consult using the form for all specialized inv in this section. ;**

When the above is listed they are discussing systematic issues so I believe this may need done for systematic issues but it doesn’t specify.  Could it be more clear?

**Response:** Change will be made**.**

37. Submits the **substantiated** assessment to the SRA, or designee, for review when completed;

**The SRA or designee:**

1. **Should conduct at least one consultation using the form for all specialized investigations in this section;**
2. **Comment:** Footnotes:

Final approval on a substantiation must be approved by the DPP director’s office.

Is this for all SI reports?

1. **Response:** Please see the previous item # 34.

34. Takes the following steps prior to a finding of substantiation due to systemic issues against a director, program director, administrator or other designated management staff:

* 1. Consults with the FSOS; and
  2. If the FSOS agrees with the SSW’s recommendation, consults with the regional attorney and documents the consultation in TWIST;

# 36 and the footnote is in reference to the language in 34.

**SOP 2.15.2**

1. **Comment: 3. Consults with DPP Child Protection Branch staff as needed during the investigation and within thirty (30) working days of receiving the referral/report, to discuss the provider/employee's ability to return to work;**

I read this as on all facility reports we consult with CP branch before individual returns to work. Correct?

**Response:** This will be deleted until further amendments are made to the regulation.