

## Statement of Consideration (SOC)

**PPTL 26-07 SOP C2.5 and SOP C2.21.** 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 C2.5 Completing the CPS Intake**

NO COMMENTS

### **SOP C2.21 Alternative Response (AR) Protocol**

**1. Comment:** In an Alternative Response, if there are threats that warrant a Safety Plan, our office is unsure as to why this is not an automatic upgrade to a traditional investigation. With this level of intervention, the parents in the case would no longer be able to refuse the involvement of the Cabinet or the implementation of services, or upper management staffing would be likely.

**Response:** A family acknowledging that a safety threat exists and participating in safety planning does not, on its own, require an escalation to a referral. Escalation is necessary only when a safety threat has been identified, and the family is unwilling to take steps to address it.

**2. Comment:** There needs to be a more detail service for AR in TWIST

**Response:** There are future plans to build AR-specific documentation requirements into TWIST.

**3. Comment:** Under Practice Guidance, "The SSW shall physically locate the child(ren) within fourteen (14) days of the initial determination that the report meets acceptance criteria." Is that 14 calendar days or working days? Working days is specified elsewhere in the SOP, but not here.

**Response:** Clarification has been added to this procedure; this reference is for calendar days. The requirement about locating the child is a direct reference from KRS 620.040 (1)(b)(1). This is a

statutory obligation outside assigned initiation timeframes and serves as a safeguard to ensure law enforcement is involved when an SSW is unable to locate a child(ren) in a timely manner. It should be noted that meeting the designated initiation time frame in AR or investigations satisfies this requirement.

4. **Comment:** It is confusing to read that the SSW has 14 days to physically locate the child (under practice guidance), but then for it to say under procedure that the SSW conducts an announced visit with the family and children within 5 working days. Is it 14 days to make contact if the children are 5 years old and older?

**Response:** See response to comment #3.

5. **Comment:** Aftercare plans may be utilized if the family would like the identification of potential services/resources at case closure. Known as a family plan in prior draft SOP. If a child is placed outside of the home on a safety plan for more than fourteen (14) consecutive working days, a regional consult will need to occur, and a petition shall be filed in court within seventy-two (72) hours. (clarify as you don't always bump on a safety plan, but you would Bump to Traditional if you are filing petitions. (Generally used to have the children out of the home due to environmental concerns that can be easily fixed.) Notice of the principles of AR and offer the family the choice between an investigation or an AR assessment. Only the AP can request a bump.

**Response:** Currently, in practice guidance, it is noted that "a pathway switch must occur when the SSW initiates court action, the family has requested an in-home ongoing case, or the family chooses to have an investigation instead of AR".

It is unclear what further clarification may be needed regarding this comment; however, central office staff is happy to discuss. If further clarification is needed, please reach out to the Child Protection Branch for further conversations. [DCBSChildProtection@ky.gov](mailto:DCBSChildProtection@ky.gov)

6. **Comment:** Confused about 14 days or 5 day to get with the family.

**Response:** See response to comment #3.

7. **Comment:** The Alternative Response Ineligibility Criteria should also include –

Any report where allegations are on an individual who is a school employee, group home employee, or daycare employee. (Or any other category of investigation that falls under specialized investigations).

**Response:** Edits have been made to clarify that only familial reports that follow the SDM Safety and Risk Assessment pathway should be considered for AR. This would eliminate specialized investigations such as those mentioned above.