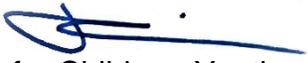




**SPECIAL TRANSMITTAL**

**SUBJECT:** Office of Children, Youth and Families, Bureau of Children and Family Services Oversight and Annual Licensing Responsibilities for County Child and Youth Agencies

**TO:** Office of Children, Youth and Families Regional Offices  
County Children and Youth Agencies  
Pennsylvania Children and Youth Administrators Association

**FROM:** Jonathan Rubin   
Deputy Secretary for Children, Youth and Families

**DATE:** November 18, 2021

**PURPOSE**

This special transmittal outlines the methodology utilized by the [Office of Children, Youth and Families' \(OCYF\) Bureau of Children and Family Services' four Regional Offices](#) during the licensing process and regular oversight of County Children and Youth Agencies (CCYAs).

**BACKGROUND**

OCYF licenses and provides oversight of the 67 CCYAs in the Commonwealth. OCYF interprets, applies and provides guidance on the regulations under 55 Pa. Code Chapters 3130, 3140, 3170, 3350, 3490 and 3700 and laws including Title 23, Pa. C. S., Chapter 63, the Pennsylvania Child Protective Services Law (CPSL) in order to ensure the best possible service delivery and operation of the CCYAs.

## **DISCUSSION**

### **Annual CCYA Licensing Overview and Methodology**

OCYF conducts annual licensing of all 67 CCYAs. The OCYF Regional Office staff conduct the annual licensing inspection by means of a random sample record review, interviews with administrative, supervisory, and casework staff, internal policy/procedures review, personnel record review and agency fiscal documentation review. A case sample is drawn from cases assigned to all program units and casework functions within the agency which includes:

- Child Protective Services (CPS) Intake Records
- General Protective Services Intake Records
- Screen-Outs
- Ongoing/In-Home Services Records
- Placement Records
- Adoption Records
- Agency Resource Home Records
- Personnel Records

For each case record reviewed, the OCYF Regional Office staff refer to a variety of documents contained in the record, including but not limited to:

- Case notes and correspondences
- Family Service Plans (FSP)
- Safety Assessment Worksheets (SAW)
- Safety Plans
- Risk Assessments
- Child Permanency Plans (CPP)
- Court orders
- Educational Records
- Medical Records

In addition, OCYF reviews administrative items which includes:

- Current organizational chart with caseload count for each person carrying cases.
- Completed copy of the agency's policy and procedure manual.
- Current list of Advisory Committee members and addresses.
- Copy of the Advisory Committee By-Laws and minutes of meetings the past year.
- 10-day supervisory logs.
- Multidisciplinary Team (MDT) meeting minutes.
- Training records for all staff.
- Records from service providers.

The county agency sampled cases for review is determined as follows:

- 10% or no more than 10 cases for each case type or program area are to be reviewed during licensure.
- Cases sampled for review should include:
  - An in-home or placement case that is a shared responsibility case.
  - A case where the youth in care was discharged from care after the age of 16.
  - A resumption of jurisdiction case.
- County Operated Foster Homes (including Kinship) reviewed will include:
  - All new homes for the Period Under Review<sup>1</sup>.
  - 10% or no more than 10 tenured homes licensed for one year or more.
- Personnel Records reviewed will include:
  - All new employee personnel files hired during the Period Under Review.
  - Training records for all staff.

When violations of regulations are identified, OCYF Regional Office staff complete a Licensing Inspection Summary (LIS) and note the specific violation. The CCYA is required to develop a Plan of Correction (POC) to address the deficiency within a specified period, outlined in [DHS Bulletin Number 14-Bul-107](#). The Bulletin outlines that the CCYA has a total of ten days to respond to the request from OCYF for a licensing POC, and if the plan is not satisfactory, the CCYA is provided five days to submit their revised POC. OCYF verifies the POCs within 30 days of the latest implementation date listed on the CCYA's POC. OCYF staff review the plan, provide feedback, and may request additional information be included in the POC. When the POC is finalized, OCYF staff verify the POC is in place as outlined. The LIS and POC are posted on the DHS website and can be accessed using the search feature found [here](#).

In addition to the activity described above, OCYF Regional Office staff provide technical assistance to address regulatory deficiencies and practice concerns that may include assistance with root cause analysis, observation of CCYA staff training and routine meetings and the provision of feedback, safety and risk assessment support sessions, training suggestions and recommendations for strategies to improve organizational challenges.

In circumstances where repeat violations are identified or where egregious violations impact the safety of children, violations may result in the issuance of a Provisional License and high-level monitoring activity. Additionally, at any time, when serious safety or health concerns are identified, OCYF may issue a revocation of the license and remove the Certificate of Compliance. When a provisional license is issued, licensing activity and monitoring may include weekly on-sight technical assistance, safety assessment training, increased case reviews and increased engagement with CCYA leadership and staff.

Counties placed on a provisional license are subject to a licensing inspection taking place at a minimum of six months until which time the county achieves full licensure

---

<sup>1</sup> The Period Under Review is defined as the day after the completion of the previous year's review until the day prior to the current year's review.

status. Per [Section 1008 of the Human Services Code](#), a maximum of four consecutive provisional licenses may be issued to an agency, at which point failure to implement a plan of correction will result in revocation of the agency's license and Certificate of Compliance. If counties are unable to successfully regain full licensure at the completion of the fourth provisional license and if the revocation is upheld following any appeal action, OCYF develops a county specific contingency plan to maintain, administer, manage and operate the program of child welfare services until such a time that the areas of deficiency are corrected, and full licensure is granted.

### **Additional Oversight Responsibilities**

In addition to completing activities for the annual inspection, OCYF Regional Office staff complete complaint investigations, in-depth child maltreatment fatality/near fatality reviews and CPS investigations when there is a conflict of interest with the CCYA completing the CPS investigation. Regional Office staff are available to the counties 24/7 for any issues which may arise or to provide technical assistance (outside the formal licensing/complaint process). In addition to the availability of the Regional Office staff 24/7, each CCYA is assigned a representative specific to its county.

County data is reviewed annually as part of the Needs Based Plan and Budget (NBPB) process and the licensing inspection by Regional Office staff. During this review, trends that may represent a practice shift are reviewed to identify areas where further inspection, root cause analysis and technical assistance may be required. Examples of practice shifts may be a decrease in kinship care, higher number of screened out reports or an increase in children placed in congregate care settings.

OCYF Regional Office staff also work closely with CCYAs in completion of the annual NBPB reviews and make recommendations to CCYAs where practice challenges and resource needs are identified.

Beyond individual county meetings, OCYF meets regularly with all counties through planned sessions with the Pennsylvania Children and Youth Administrator's (PCYA) Association and provides ongoing programmatic and system updates to assure counties remain up to date on any changes to requirements or recommended practices.