



March 1, 2023

Auditor Timothy M. O'Brien, CPA
Office of the Auditor
City and County of Denver
201 West Colfax Avenue, Dept. 705
Denver, Colorado 80202

Dear Mr. O'Brien,

The Office of the Auditor has conducted a performance audit of the Administration of Child Welfare Placement Services.

This memorandum provides a written response for each reportable condition noted in the Auditor's Report final draft that was sent to us on February 8, 2023. This response complies with Section 20-276 (c) of the Denver Revised Municipal Code (D.R.M.C.).

AUDIT FINDING 1

The caregiver certification process lacks formal training and guidance

RECOMMENDATION 1.1

Managers in the Child Welfare Division's placement services group should develop and document a formal training plan specific to the certification, training, and recruitment team. This plan should include, at minimum:

- A list of the types of training required and how often each training should be taken after an employee is hired (for example, only one time versus once each year).
- A description of how the division will track and document training.
- How often the training plan should be reviewed and updated.
- How the division will develop and use individual training plans to ensure a focused approach to staff training and development.

This training plan should also identify which staff — in addition to intake caseworkers and ongoing caseworkers — should be trained in the kinship caregiver certification process, as well as the types of training they should receive and how often.

Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	05/31/2023	Erin Hall, Child Welfare Administrator (720-944-6272)

Narrative for Recommendation 1.1

Denver Human Services (DHS), Child Welfare Division is guided by the Code of Colorado Regulations, Volume 7, which provides standard guidance for Child Welfare requirements to all counties in Colorado.

The Certification, Training, and Recruitment team consists of six staff and one supervisor who are responsible for the certification of foster parents. The Social Case Workers (SCW) on this team are required to follow the training and tracking requirements outlined in Volume 7 to maintain their certification as a SCWs. The certification staff on this team are classified as Business Operation Assistants and there are no training requirements outlined in Volume 7 for certification staff. DHS values professional development and created a training policy for the certification staff, the others on the team who are crossed trained to certify foster families and the intake and on-going caseworkers in Child Welfare.

RECOMMENDATION 1.2		
Managers in the Child Welfare Division’s placement services group should develop and document current guidance on the kinship caregiver certification process that accurately describes all required steps, who is responsible for those steps and for updating the procedures, and how often the procedures should be reviewed and updated. In addition, the procedures should include an effective date.		
Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	05/31/2023	Erin Hall, Child Welfare Administrator (720-944-6272)

Narrative for Recommendation 1.2

The kinship rule (7.304.21 C,5) guiding the child welfare practice when children and youth are placed with kin was changed to set time limitations on how long a child can remain in a non-certified kinship home while in the custody of the county. This rule went into effect on March 1, 2021. This was a significant change in practice for Denver County. We began strategizing ways

to (1) increase the number of kinship families we were certifying as foster families and (2) grant kinship families’ temporary legal custody (TLC) within 90 days of taking custody. We created a means to track the length of stay in non-certified kinship homes, which the state did not offer at that time. We also began updating certification paperwork to be more kinship friendly.

In collaboration with DHS’ Performance Improvement and Accountability Division (PIAD), the Placement Services section scheduled three two-day Operational Standard Work (OSW) events to get a standardized, sustainable process in place to ensure compliance with this rule change. Given the far-reaching impacts this rule had, it was determined it would be best to break the work into three separate OSW events. The first OSW took place in September 2021, the second was held in November of 2022, and the third was held in February of 2023. Monthly check ins will continue through June of 2023 or until all OSW tasks have been completed. OSW tasks include creating a document and training identified staff to assist them with the new process, as an example.

Throughout the OSW process, guidance on the kinship caregiver certification process is continually being updated to accurately describe all required steps, who is responsible for those steps and for updating the procedures, and how often the procedures should be reviewed and updated.

RECOMMENDATION 1.3

Managers in the Child Welfare Division’s placement services group should review the agency’s internal shared drive and any other file storage areas to identify and remove outdated procedures associated with the kinship caregiver certification process. Then, managers should identify where current procedures should be kept going forward and communicate that to all relevant staff.

Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	02/27/2023	Erin Hall, Child Welfare Administrator (720-944-6272)

Narrative for Recommendation 1.3

The internal shared drive (S Drive) has been reviewed and organized so documents related to the kinship caregiver certification process can easily be found by Placement Services staff. All relevant staff were made aware that the current certification documents can be found in the S Drive on February 27, 2023.

RECOMMENDATION 1.4

The Child Welfare Division should develop and document a plan to reduce caseworker and support staff turnover. This plan should:

- List strategies for improving caseworker and support staff retention using best practices from leading child welfare organizations and the city.
- Describe the division’s assessment of potential caseworker and support staff retention strategies and which it will use.
- Document the individuals responsible for regularly reviewing and updating the retention plan and how often this should happen.

Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	05/31/23	Josie Berry, Child Welfare Division Director (720-944-3162)

Narrative for Recommendation 1.4

The Denver Child Welfare division acknowledges that ongoing and innovative recruitment and retention strategies are an important part of retaining a strong workforce. In 2022, our overall vacancy rate was 12%, and 24% of all hiring actions were promotions. Internal movement is one of our retention strategies. It supports staff learning and growth, provides opportunities to experience different work functions and increases staff engagement. The Child Welfare division has continuously explored and implemented several recruitment and retention strategies which will be included within our retention plan.

AUDIT FINDING 2

The policies and procedures for Denver Human Services’ imprest fund are insufficient and outdated

RECOMMENDATION 2.1

Denver Human Services’ Financial Services Division should apply for another waiver from the Controller’s Office to clarify which elements of Fiscal Accountability Rule 3.2 apply to Denver Human Services’ imprest fund.

Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	05/31/23	Justin Sykes, Financial Services Division Director (720-944-2154)

Narrative for Recommendation 2.1

DHS is in the process of drafting a waiver request to submit to the Controller’s Office for review clarifying which aspects of Fiscal Accountability Rule 3.2 apply.

RECOMMENDATION 2.2

Denver Human Services’ Financial Services Division should develop, document, and approve more robust procedures for its imprest fund. The procedures should mention which specific requirements from Fiscal Accountability Rule 3.2 apply based on the guidance from the Controller’s Office. The procedures should also detail, at a minimum:

- How often the procedures should be reviewed and updated.
- The types of reconciliations required along with those responsible for completing them and how often reconciliations should happen.
- Any additional forms other divisions require to document spending approvals.
- The requirement for additional approvals for requests that exceed \$1,000 and where those approvals are to be documented.
- The process for identifying and resolving outstanding checks and ensuring each voided check is recorded.
- The actual daily transaction limit.
- An effective date.

Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	05/31/23	Justin Sykes, Financial Services Division Director (720-944-2154)

Narrative for Recommendation 2.2

DHS is in the process of revising its imprest fund procedures to include more details.

RECOMMENDATION 2.3 Denver Human Services' Financial Services Division should finalize its draft procedures regarding secure storage devices, including its authorization form. Once the procedures are approved, the division should implement them and communicate them to all relevant staff.		
Agree or Disagree with Recommendation	Target date to complete implementation activities (Generally expected within 60 to 90 days)	Name and phone number of specific point of contact for implementation
Agree	02/28/23	Justin Sykes, Financial Services Division Director (720-944-2154)

Narrative for Recommendation 2.3

This recommendation is already implemented.

Please contact Robert Baker, Internal Audit Supervisor at (720) 944-2832 with any questions.

Sincerely,



Jay Morein
Executive Director

cc: Valerie Walling, CPA, Deputy Auditor
Dawn Wiseman, CRMA, Audit Director
Emily Owens Gerber, MPA, Audit Manager