10/6/16

Michigan Department of Health & Human Services
Division of Child Welfare Licensing
Placing Agency Foster Care Contract & Adoption Contract - Employee File Review

Green – ISEP /// Yellow – DHS Policy and Contracts /// Blue – Rule Interpretations/// Purple - Memos

Agency

Consultant | Date

Staff / Volunteer Name

Consultants MUST review clearances and training for ALL employees who have access to CHRI. **SRM 200 -** Did the consultant review the **DHHS 50 Employee Departure Checklist**, for all employees who terminated employment since the last inspection? Were all DHHS 50 forms completed for these employees? ☐YES ☐NO		CHRI Access									
Sample Size 1. All employees hired since last evaluation 2.	**Rule 205 – Qualifications** Chief Administrator Social Service Supervisor Social Service Worker	Hire Date									
# of Employees < 1 Year _____ **# of Employees > 1 Year** _____ **10/10/2014 Memo RE DHS Employee Files** "CWTI" Course Name for New Worker Training **Rule 101(L) -** Acceptable Social Service- Human Behavioral Science Degrees http://ope.ed.gov/accreditation/ - a data base that lists accredited colleges and universities.		Position									
R 400.12209 Orientation and training. RI.209 (1) An agency shall ensure and document that each social service worker and each social service supervisor receives not less than 16 hours of orientation after initial appointment and before assumption of assigned duties.											
(2) An agency shall ensure and document that each social service worker and each social service supervisor receives not less than 15 hours of training relating to his or her current position within the first year of being assigned to the position.											
CI 16-146 Child welfare caseworkers are required to complete 32 hours of in-service training per year; child welfare supervisors are required to complete 16 hours of in-service training per year. By December 31, 2016, all child welfare staff should have their in-service training hours documented in the MDHHS Learning Management System (LMS).											
ISEP 4.5 – Page 9 – entry-level caseworkers [CPS, foster care, and adoption] will have at least a bachelor's degree in social work or a related human services field											
ISEP 4.5 – Page 9 – DHHS will maintain a caseload progression formula that corresponds to the worker's advancement in training. At the current time the 270 hours of CWTI is the approved training.											
PAFC Contract I.E.6.a – Page 6 – A staff who has already completed CWTI Pre-Service training and is transferring from another social service position to a foster care social service position shall complete Foster Care Private Agency Program Specific Transfer Training within six months of the transfer,											

Employed more than a year	Sample Size
1 to 3	All
4 to 30	3
31 to 60	6
Over 61	8

Adoption I.K.I – Page 7 – DHS Contract 10/1/14 – An adoption supervisor shall attend an annual MARE informational session and disseminate MARE information to agency adoption staff.										
(3) An agency shall ensure and document that each social service worker and each social service supervisor receives not less than 15 hours of planned training relating to his or her current position annually after the time periods specified in subrules (1) and (2) of this rule.										
(4) The orientation and training specified in subrules (1) and (2) of this rule for each social service worker shall include all of the following topics: (a) Characteristics and needs of children and families served by the agency.										
(b) Requirements of applicable statutes relating to the services the agency provides that are subject to these rules.										
(c) Agency expectations for the social service worker to facilitate and supervise the care of children and to work with families that are served by the agency.										
(d) Agency expectations for the social service worker's role and responsibility with foster parents and other persons who provide care or services to children and families served by the agency.										
(e) Agency expectations for developing, maintaining, and reviewing initial and updated service plans for children and families served by the agency.										
R 400.12212 Personnel records. RI.212 (1)An agency shall maintain a personnel record for each staff member.										
(2) The personnel record shall contain all of the following information before employment may occur: (a)Name.										
(b) Verification of education.										
(c) Work history.										
(d) Three references obtained from persons who are unrelated to the staff person.										
(e) A record of any convictions-other than minor traffic violations from either of the following: (i) The Michigan state police or the equivalent state or Canadian provincial law enforcement agency where the person usually resides. (ii) An entity accessing either Michigan state police records or equivalent state or Canadian provincial law enforcement agency where the person usually resides.										
SRM 200, p.9-11 – Does employee have access to CHRI? If so, was criminal clearance completed showing no felony convictions?										
(f) If the employee has criminal convictions, the chief administrator or his or her designee shall complete a written evaluation of the convictions that addresses the nature of the conviction, the length of time since the conviction, and the relationship of the conviction to regulated activity.										
SRM 200, p. 9-11-If the employee has access to CHRI and has any misdemeanor convictions, were they reviewed in writing by the chief administrator?										
(g) A written statement from the employee regarding any convictions.										
(h) Documentation from the department that the person has not been named in a central registry case as the perpetrator of child abuse or neglect in Michigan or in any state where the person lived in the 5 years preceding hire.										
(3) The personnel record shall contain both of the following: (a) A written evaluation of a staff member's performance within a probationary period or not later than 6 months after the staff member assumes his or her current responsibilities. After the initial evaluation, a written evaluation shall be conducted each year.										
(b) A copy of the job description for the staff member's current position.										
(4) An agency shall maintain an orientation and training record for staff members.										

R 400.12206 Staff qualifications. RI.206 Rule 206. (1) An agency shall require a staff member who has ongoing contact with children or parents to be a person-who has the ability, experience, education, and training to perform the duties assigned. An agency's policy on staff qualifications shall state all of the following: (a) A person who has unsupervised contact with children may not have been convicted of either of the following: (i) Child abuse or neglect.										
(ii) A felony involving harm or threatened harm to an individual within the 10 years immediately preceding the date of hire.										
(b) A person who is listed on the central registry as a perpetrator of child abuse or child neglect shall not have unsupervised contact with children.										
ISEP 5.1 – Page 14 – For new foster care and adoption workers, three cases may be assigned on or after the first day of training. After three weeks of training, up to five cases may be assigned to the worker. After nine weeks of training, a final, full caseload may be assigned.										

VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION

MSA VI.A.2 **page 10**	**VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION** A. *Caseworker Qualifications and Training*:
	2. All caseworkers who do not possess the University-based Child Welfare certificate shall complete pre-service training that includes a total of 270 hours of competence-based training which shall be completed within 16 weeks from date of hire. The training shall include a minimum of four weeks' classroom instruction and five weeks' field instruction, and may include eLearning. The Department may modify the number of weeks in specific instructional settings upon consultation with the Monitors.

VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION #2

MSA VI.A.6 **page 12**	**VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION** A. *Caseworker Qualifications and Training*:
	6. All caseworkers shall receive a minimum number of hours of in-service training annually, … for the state fiscal year beginning October 1, 2012, at least 32 hours.

VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION #3

MSA VI.A.III **page 11**	**VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION** A. *Caseworker Qualifications and Training*:
	3. New caseworkers who possess the University-based Child

	Welfare certificate shall be required to complete program-specific training. The program-specific training curriculum for Child Welfare certificate holders shall be reviewed and approved by the Monitors.

Caseload Progression for Foster Care and Adoption

MSA VI.B.5.b. i-iii Page 12	***Caseload Progression for Foster Care and Adoption*:**
	b. i. Three training cases may be assigned on or after day one of pre-service training at the supervisor's discretion using CWTI case assignment guidelines. ii. Upon completion of week three of pre-service training and successful completion of Competency Test One, up to five total cases may be assigned with supervisory approval using CWTI case assignment guidelines. iii. Final caseload may be assigned after nine weeks of pre-service training, successful completion of Competency Test Two, and satisfactory review by the trainer and the supervisor.

Supervisor Qualifications and Training

MSA VI.B. II & III - page 13	**Supervisor Qualifications and Training**
	2. DHS shall implement a competency-based supervisory training program that is both consistent with the principles set forth in Section II of this Agreement and designed to serve the overall goals and purposes of this Agreement. This competency-based training shall address the work management skills, conceptual skills, interpersonal skills, self-management skills, and technical knowledge recognized among child welfare professionals as fundamental requirements for an effective child welfare agency supervisor. The supervisory training program shall be at least 40 hours. Nothing in this paragraph shall prohibit DHS from delegating the delivery aspect of training. 3. All staff either promoted or hired to a child welfare supervisory position shall complete the supervisory training program and pass a competency-based performance evaluation based on that training within three months of assuming the supervisory position. The competency-based performance evaluation shall include a written examination. Failure to achieve a passing grade on the competency-based performance examination as a whole, including a passing grade on its written portion, within two sittings shall require the subject individual to complete additional training before becoming eligible to sit for the

	performance evaluation again. The additional training shall occur within 45 days of the most recent failed exam. The failure to pass the performance evaluation in the third sitting shall render the subject individual ineligible for further service as a child welfare supervisor.

VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION #4

MSA VI.A.4 Page 11	**VI. STAFF QUALIFICATIONS, TRAINING, CASELOADS, AND SUPERVISION** A. *Caseworker Qualifications and Training*:
	4. Each trainee shall shadow an experienced child welfare caseworker and progressively build case practice knowledge through intensive classroom and field training. An experienced caseworker (mentor) shall also shadow each trainee as they complete key activities in a case. No mentor assigned to shadow a trainee shall have a caseload exceeding current caseload standards.

Rule 205.2 - Chief Administrator Qualifications

(2) An agency shall appoint a chief administrator who possesses at least 1 of the following:

(a) A master's degree in a human behavioral science, or in another major where 25% of the course credits earned toward the degree are in human behavioral sciences, business administration, or public administration from an accredited college or university and 2 years of experience in an agency or child caring institution, at least 1 of which is in a management capacity.

(b) A bachelor's degree in a human behavioral science, or in another major where 25% of the course credits earned toward the degree are in human behavioral sciences, business administration, or public administration from an accredited college or university and 4 years of post- bachelor's degree experience in an agency or child caring institution, at least 2 of which are in a management capacity.

Rule 205.4 - Social Service Supervisor Qualifications

(4) An agency shall appoint a social service supervisor who possesses the qualifications in either of the following:

(a) A master's degree from an accredited college or university in a human behavioral science or in another major where 25% of the course credits earned toward the degree are in human behavioral sciences and 1 year of experience as a social service worker in an agency, or a child caring institution, or in an agency in a child welfare function.

(b) A bachelor's degree from an accredited college or university in a human behavioral science, or in another major where 25% of the course credits earned toward the degree are in human behavioral sciences, and 4 years of experience as a social service worker, 2 years of which are in an agency or in a child caring institution, or in an agency in a child welfare function.

Rule 205.5 –Social Service Worker Qualifications

(5) An agency shall appoint a social service worker who possesses at least a bachelor's degree from an accredited college or university with a major in a human behavioral science, or in another major where 25% of the course credits earned toward the degree are in human behavioral sciences.

Rule 101(L) - Acceptable Social Service Degrees

(L) "Human behavioral science" means a degree from an accredited college or university in any of the following:

(i) Social work.
(ii) Psychology.
(iii) Counseling and guidance.
(iv) Child development
(v) Criminal justice.
(vi) Family and child ecology.
(vii) Sociology.
(viii) Family community services.
(ix) Family studies.
(x) Family Live Education
(xi) Human Services

Contract TFC 1.F.1.g & TFC 1.F.2.i – Page 8 and 9 - Training Requirements for TFC Supervisor and Case Manager
(2 Violation Boxes)

Contract TFC	
	F. Staff Qualifications and Requirements: 1. The TFC Supervisor shall: Complete 30 hours of treatment foster care pre-service training using a curriculum that meets the requirement of the Foster Family-Based Treatment Association program standards and that has been approved, in writing by the Bureau of Child Welfare – Health, Education and Youth Unit (HEYU), prior to assuming any supervision responsibilities.

Contract TFC	
	F. Staff Qualifications and Requirements: 2. The TFC Case Manager shall: Complete 30 hours of treatment foster care pre-service training using a curriculum that meets the requirement of the Foster Family-Based Treatment Association program standards and that has been approved, in writing by the Bureau of Child Welfare – Health, Education and Youth Unit (HEYU), prior to assuming any supervision responsibilities.

DHS IL+ Contract I.M.1 – page 12 - IL+ staff to complete CWTI within Six Months of assuming the Foster Care position

DHS IL+ Contract I.M.1 – page 12	**IL+ staff to complete CWTI within Six Months of assuming the Foster Care position**
	M. Staff Training and Qualifications: 1. The Contractor shall ensure that staff have successfully completed

	the Child Welfare Training Institute (CWTI) Pre-Service Institute (PSI) training and shall attend and complete CWTI Foster Care Private Agency Program Specific Transfer Training (PSTT) within six months of assuming the foster care position, if they have not completed it since January 2012.

DHS IL+ Contract I.M.2 – page 12 - IL+ Staff required to have a JJOLT User ID And Password

DHS IL+ Contract I.M.2 – page 12	**IL+ Staff required to have a JJOLT User ID And Password**
	M. Staff Training and Qualifications 2. All staff required to attend CWTI training shall apply for a Juvenile Justice Online Technology (JJOLT) secure user ID and password at http://www.michiganchildwelfaretraining.com/

DHS IL+ Contract I.M.4.a – page 12 - Educational Requirements of IL+ Coach

DHS IL+ Contract I.M.4.a – page 12	**Educational Requirements of IL+ Coach**
	M. Staff Training and Qualifications: 4. The ILP Coach: a. Must possess a minimum of an Associate's degree or minimum of 60 semester hours or 95 quarter hours in a related field of study.

DHS IL+ Contract I.M.4.c – page 12 - Caseload of ILP Coach / Caseworker

DHS IL+ Contract I.M.4.c – page 12	**Caseload of ILP Coach / Caseworker**
	M. Staff Training and Qualifications: 4. The ILP Coach: c. May not have more than ten (10) ILP children assigned at any given time.

10/10/2014 Memo RE DHS Employee Files

From: Tribble, Janice (BCAL)
Sent: Friday, October 10, 2014 12:31 PM
To: Corrigan, Gregory (BCAL); Tansil, Linda (BCAL); Lee, Linda (BCAL); Ragsdale, Steven (BCAL); Fiorletta, Kathy (BCAL); Collier, Donald (BCAL); White, Bill (BCAL); Turrill, Douglas (BCAL); Dodge-Garnaat, Rorie (BCAL); Hunter, Mark (BCAL); Muntean, Kari (BCAL); Reilly, Heather (BCAL); Barr, Christopher (BCAL); Brown, Pinkey (BCAL); Neitman, Patricia (BCAL); Malleck, Vivian (BCAL); Gale, James (BCAL); Will, Deborah (BCAL); Perry, Lonia (BCAL); Wiggins, Alicia (BCAL); Slottke, Carol (BCAL); Decker, Venus (BCAL); Ahmad, Cindy (DHS); Hull, Angela (DHS)
Subject: FW: Change in Filing of BCAL Required Hiring Documents

See information below related to personnel records in DHS local offices.

Janice

From: Crawford, Karen (DHS)
Sent: Friday, October 10, 2014 9:30 AM
To: Wieber, Deborah (DHS)
Subject: FW: Change in Filing of BCAL Required Hiring Documents

Message From Deb Wieber, DHS OHR Director to Central Office and Field Directors, Business Center Liaisons, Onsite Contacts

Required hiring licensing records now maintained in Office of Human Resources

The Bureau of Children and Adult Licensing (BCAL) requires that hiring related records be made available to them for audit purposes for appointments to Services Specialists, Services Program Manager 14's, all County Directors and those District Managers that are responsible specifically for child welfare. To date, BCAL has required that these records be maintained at the local offices.

At the request of the Children's Services Administration (CSA) , the Office of Human Resources (OHR) has been working with BCAL to improve this document retention structure. As a result we have worked out a system where OHR will maintain these required hiring documents electronically, rather than maintaining these paper records at the local office. These documents will be made available to BCAL electronically upon request. In addition to streamlining the record retention and recovery of the documents required by BCAL, this new process will facilitate the documents being available to BCAL when an employee moves between work sites.

Effective immediately, the pertinent documents that OHR collects through the Centrally Coordinated Hiring Pool (CCHP) and with any hiring process for the above noted classifications from this point forward, will be filed exclusively with OHR.

For the pertinent hiring documents that are currently being maintained in your office we are asking you send those to OHR electronically. The CSA Deputy Director and the Business Service Center Directors support a single point of maintaining these records.

The attached includes the detail of how this will work. Please feel free to contact either me or Kim Thelen (ThelenK11@michigan.gov) at 517-373-7534 with any questions or issues that may come up.

Note: Although Juvenile Justice Facilities fall under BCAL audits, this change in filing does not apply to them at this time.

Adoption I.K.l – Page 7 – DHS Contract 10/1/14 - MARE Related Responsibilities – Annual MARE Informational Session

Adoption I.K.l – Page 7 – DHS Contract 10/1/14	**MARE Related Responsibilities – Annual MARE Informational Session**
	3. MARE Related Responsibilities l. The Contractor shall ensure that a supervisor attends the regionally based MARE informational session annually. This individual shall then be responsible to disseminate MARE information and material to appropriate agency staff.

"CWTI" Course Name for New Worker Training - Approved Pre-Services Institute and Training Hours

Here is a list of the titles and associated hours for the courses that meet the MSA requirement for completion of training for newly hired child welfare caseworkers within 16 weeks of hire:

"CWTI" Course Name for New Worker Training	Hours
Adoption Pre-Service Institute (PSI)	270/320
CPS Pre-Services Institute	270/320
Foster Care DHS Pre-Service Institute	270/320
Foster Care Private Agency Pre-Service	270/320
Adoption Child Welfare Certificate PSI	176
CPS Child Welfare Certificate PSI	176
FC Child Welfare Certificate PSI	176

Please let me know if you have any additional questions.

Sarah Goad, MSW
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Office of Workforce Development and Training
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R 400.12209 Orientation and training.

There is no requirement in the rule that an agency send staff for training through the Child Welfare Training Institute. Local DHHS offices and agencies under contract to the department, however, must attend CWTI and meet training requirements outlined in the Modified Settlement Agreement. Regardless of what training program is utilized for initial training, all topics identified in subpart 4 of the rule must be covered.
Shadowing may be a part of orientation but cannot be the only form of orientation. The total number of required hours of orientation must be completed before a social service worker or supervisor assumes sole responsibility for assigned duties.

R 400.12212 Personnel records.

(1) There must be a personnel file for all staff members, including volunteers and contractual employees.
(2) (b) Verification of education must be commensurate with that described in the job description, even if that is a greater requirement than the rule requirement.
(d) References may be in the form of written documentation of conversations or letters of reference. If the reference is taken from a conversation, the information is to be documented on a reference form and it must be noted how the information was received. It is recommended that references be written and dated within the 12 months preceding hire. The name of the person giving the reference and this person's relationship to the employee must be documented.
(3) When a person changes from one position to another, there is an expectation that there be a review of performance not later than 6 months after the person changes positions.
(4) Training records must be maintained. They may be maintained in a separate file from the regular personnel record.

R 400.12206 Staff qualifications.

(1) When there is a rule that deals with a specific problem or issue that has been identified by a consultant, that rule is to be cited. This rule is to be used when there is misconduct by an administrator or staff person that does not fit into another rule.

(2)*MCL 722.119 states:*
(1) A staff member shall not be present in a child care center, child caring institution, or child placing agency if he or she has been convicted of either of the following:
- *(a) Child abuse or child neglect.*
- *(b) A felony involving harm or threatened harm to an individual within the 10 years immediately preceding the date of hire.*

(2) A volunteer shall not have unsupervised contact with children who are in the care of a child care center, child caring institution, or child placing agency is he or she has been convicted of either of the following:

(a) Child abuse or child neglect.

(b) A felony involving harm or threatened harm to an individual within the 10 years immediately preceding the date of offering to volunteer at the child care center, child caring institution, or child placing agency.

(3) Before a staff member or unsupervised volunteer may have contact with a child who is in the care of a child care center, child caring institution, or child placing agency, the staff member or volunteer shall provide the child care center, child caring institution, or child placing agency with documentation from the family independence agency that he or she has not been named in a central registry case as the perpetrator of child abuse or neglect. For individuals who are employed by or volunteer at a child care center, child caring institution, or child placing agency, the child care center, child care center, or child placing agency shall comply with this subsection not later than the date on which that child care center's, child caring institution's, or child placing agency's license is issued or first renewed after the effective date of the amendatory act that added this section. As used in this subsection, "child abuse" and "child neglect: mean those terms as defined in section 2 of the child protection law, 1975 PA 238, MCL 722.622.

(4) Each child care center, child caring institution, or child placing agency shall establish and maintain a policy regarding supervision of volunteers who are parents of a child receiving care at the child care center, child caring institution, or child placing agency.

Child placing agencies are not required to post whether or not criminal record checks are done on staff. Criminal record checks are not required by the statute or the rule. If the agency has a policy that requires applicants or employees to provide criminal record checks or if the agency does an ICHAT clearance on applicants or employees, the consultant may cite the agency if there is no documentation of the criminal record check.

A BCAL 1326, Criminal Record Check, shall be completed on the chief administrator. For a DHHS office, this is the director of the county DHHS. In other CPA's, this is the person who is responsible for the day-to-day operation of the organization that is tied to the specific license number. This person must be located in Michigan.

If a record check has been completed and there is a conviction, or an employee has reported a criminal conviction, the agency must have a written assessment of all convictions, both felony and misdemeanor, before assigning the person to a position covered by these rules. Fraud is an intentional misrepresentation of any material fact and includes bribery, forgery, uttering and publishing and false pretenses. Convictions for domestic violence fall into the category of harm or threatened harm. The written assessment must address the nature of the conviction, when the convictions occurred, and evidence of rehabilitation.

MSA VI.B.1.a&b page 12 - Supervisor Qualifications

MSA VI.B.1.a&b page 12	**Supervisor Qualifications**
	B. *Supervisor Qualifications and Training*: All provisions of this

	section shall apply to (1) all DHS supervisory positions in CPS, foster care, and adoption, who are responsible for cases of Plaintiff class members either directly or as POS workers, and (2) all private agency supervisors with corresponding responsibilities for class members. 1. *Supervisor Qualifications*: All staff either promoted or hired to a child welfare supervisory position shall possess one of the following qualifications: a. A master's degree from an accredited college or university in a human behavioral science and three years of experience as a social service worker in a child welfare agency, a child caring institution, or in an agency performing a child welfare function. b. A bachelor's degree from an accredited college or university in a human behavioral science and four years of experience as a social service worker, three years of which shall have been in a child welfare agency, a child caring institution, or in an agency performing a child welfare function.

TFC 1.F.1 – page 6 - Services to be Provided

TFC 1.F.1 – page 6	**Services to be Provided**
	1. The Contractor shall establish a TFC treatment team for each TFC child entering TFC placement and demonstrate active efforts to maintain the same treatment team as long as the child remains in TFC placement. At a minimum, the treatment team must consist of the following: a. A TFC case manager. b. A TFC supervisor. c. A TFC behavioral aide. d. A TFC parent(s). e. The child in placement. f. A birth parent(s) or other identified permanent caregiver for the child. g. A DHS or Placement Agency Foster Care (PAFC) staff, with family responsibility. h. A mental health worker (therapist). i. Other appropriate community members such as school personnel, the child's Lawyer Guardian Ad Litem (LGAL) and other advocates for the child/family.

TFC 1.G.1.a – page 9 – Treatment Foster Care Social Service Supervisor Qualifications

TFC 1.G.1.a – page 9	**Treatment Foster Care Social Service Supervisor Qualifications**
	1. The TFC Supervisor shall: a. Possess a minimum of a Master's Degree in a human service field and a minimum of two years of experience in the placement/treatment

	of children and families. The TFC supervisor shall be qualified to provide clinical supervision to the TFC case manager

TFC 1.G.1.g– page 9 - Supervisor Qualifications – 30 Hours of Pre-Service Training

TFC 1.G.1.g– page 9	**Supervisor Qualifications – 30 Hours of Pre-Service Training**
	G. Staff Qualifications and Requirements: 1. The TFC Supervisor shall: g. Complete 30 hours of treatment foster care pre-service training using a curriculum that meets the requirement of the Foster Family-Based Treatment Association program standards that includes a section on providing trauma-informed care and that has been approved, in writing by the Bureau of Child Welfare – Education and Youth Unit (EYU), prior to assuming any supervision responsibilities.

TFC 1.G.1.h – Page 10 - Supervisor Qualifications – 24 Hours of Approved Annual Training

TFC 1.G.1.h – Page 10	**Supervisor Qualifications – 24 Hours of Approved Annual Training**
	G. Staff Qualifications and Requirements: 1. The TFC Supervisor shall h. Complete a minimum of 24 hours of annual training that meets the requirement of the Foster Family-Based Treatment Association.

TFC 1.G.2.a – Page 10 - TFC Staff Qualifications – Education and Experience

TFC 1.G.2.a – Page 10	**TFC Staff Qualifications – Education and Experience**
	2. The TFC Case Manager shall: a. Possess either a Master's Degree in a human services field or a Bachelor's Degree (B.A., B.S., or a B.S.W) in a human services field with two years' experience working with children and families in foster placement, with experience in assessment and development of services plans.

TFC 1.G.2.d – Page 10 - TFC Staff Qualifications - Caseload Size

TFC 1.G.2.d – Page 10	**TFC Staff Qualifications - Caseload Size**
	2. The TFC Case Manager shall: d. Have a caseload of no more than eight TFC children at any given time. Note: A TFC case manager with less than a full TFC

	caseload may have additional responsibilities; the total hours of the mixed caseload for the TFC Case Manager shall not exceed 1.0 FTE.

TFC 1.G.2.i – Page 11- TFC Staff Qualifications - – 30 Hours of Pre-Service Training

TFC 1.G.2.i – Page 11	**TFC Staff Qualifications - – 30 Hours of Pre-Service Training**
	2. The TFC Case Manager shall: i. Complete 30 hours of treatment foster care pre-service training using a curriculum that meets the requirement of the Foster Family-Based Treatment Association program standards and that has been approved, in writing by the Bureau of Child Welfare – Education and Youth Unit, prior to assuming any case management responsibilities.

TFC 1.G.2.j – Page 11 - TFC Staff Qualifications -– 24 Hours of Approved Annual Training

TFC 1.G.2.j – Page 11	**TFC Staff Qualifications -– 24 Hours of Approved Annual Training**
	2. The TFC Case Manager shall: j. Complete a minimum of 24 hours of annual training that meets the requirement of the Foster Family-Based Treatment Association.

TFC 1.G.2k – Page 11 - TFC Staff Qualifications – Completion of CWTI Foster Care Pre-service Training or Foster Care Specific Transfer Training

TFC 1.G.2k – Page 11	**TFC Staff Qualifications – Completion of CWTI Foster Care Pre-service Training or Foster Care Specific Transfer Training**
	2. The TFC Case Manager shall: k. Complete the Child Welfare Training Institute 8-week Foster Care Training or Foster Care Specific Transfer Training, if said training has not already been completed, prior to assuming any case management responsibilities.

TFC 1.G.3.a – Page 11 - TFC Staff Qualifications– Behavioral Aide – High School Degree

TFC 1.G.3.a – Page 11	**TFC Staff Qualifications– Behavioral Aide – High School Degree**
	3. The TFC Behavioral Aide shall: a. Possess a minimum of a high school degree, although an Associate's degree is preferred.

TFC 1.G.3.c – Page 11 - TFC Staff Qualifications– Behavioral Aide - SOM Driver's License

TFC 1.G.3.c – Page 11	TFC Staff Qualifications– Behavioral Aide - SOM Driver's License
	3. The TFC Behavioral Aide shall: c. Have a valid State of Michigan driver's license and have a reliable vehicle available to provide transportation as necessary.

TFC 1.G.3.f – Page 11 - TFC Staff Qualifications– Behavioral Aide – 30 Hrs. TFC Pre-Service Training

TFC 1.G.3.f – Page 11	TFC Staff Qualifications– Behavioral Aide – 30 Hrs. TFC Pre-Service Training
	3. The TFC Behavioral Aide shall: f. Complete 30 hours of treatment foster care pre-service training using a curriculum that meets the requirement of the Foster Family-Based Treatment Association program standards that includes a section on providing trauma informed care and that has been approved, in writing by the Bureau of Child Welfare –Education and Youth Unit, prior to assuming any case responsibilities.

TFC 1.G.3.g – Page 11 - TFC Staff Qualifications– Behavioral Aide – 24 Hrs. annual Training

TFC 1.F.3.g – Page 11	TFC Staff Qualifications – Behavioral Aide – 24 Hrs. annual Training
	3. The TFC Behavioral Aide shall: g. Complete a minimum of 24 hours of annual training that meets the requirement of the Foster Family-Based Treatment Association.

TFC 1.G.3.d - Page 11-- TFC Staff Qualifications – One FTE Behavioral Aide: Ten Children

TFC 1.G.3.d – Page 11	TFC Staff Qualifications – One FTE Behavioral Aide: Ten Children
	3. The TFC Behavioral Aide shall: d. Have no more than ten TFC children assigned at any given time. (1 FTE TFC behavioral aide: 10 children)

PAFC Contract I.E.6.a – Page 6 – CWTI Training Requirements for a Staff Transferring to a Foster Care Position

PAFC Contract I.E.6.a – Page 6	CWTI Training Requirements for a Staff Transferring to a Foster Care Position

	6. Staff Training a. Child Welfare Training Institute: Requirements The Contractor shall ensure that staff transferring to a foster care social service position from another children's services position that has successfully completed the Child Welfare Training Institute (CWTI) Pre-Service Institute (PSI) training in that program, shall attend and complete CWTI–Foster Care Private Agency Program Specific Transfer Training (PSTT) within six months of assuming the foster care position.

ISEP 4.5 – Page 9 - Caseworker Qualifications and Training (Commitment 5).

ISEP 4.5 – Page 9	**Caseworker Qualifications and Training (Commitment 5).**
	(a) DHHS will maintain a policy that entry-level caseworkers have a bachelor's degree in social work or a related human services field and providing for a caseload progression for all workers that includes appropriate training before the assignment of cases and competency examinations and supervisory approval before assignment of a full caseload. DHHS will also maintain a policy that entry level licensing workers have a bachelor's degree in social work or a related human services field. (b) The requirements in this Commitment apply to all DHHS caseworkers for positions in CPS, foster care, and adoption, who are responsible for cases of Plaintiffs either directly or as purchase-of-service ("**POS**") workers, and any private agency caseworkers with corresponding responsibilities for class members.

ISEP 5.1 – Page 14 - Caseload Progressions for New Employees (Commitment 23).

ISEP 5.1 – Page 14	**Caseload Progressions for New Employees (Commitment 23).**
	b. For foster care and adoption workers, three training cases may be assigned on or after day one of pre-service training at the supervisor's discretion using CWTI case assignments guidelines. After completion of week three of pre-service training, up to five total cases may be assigned with supervisory approval using CWTI case assignment guidelines. Final caseload may be assigned after nine weeks.

SRM 200 FingerPrints

OVERVIEW

This policy outlines the process and requirements for obtaining and using fingerprint-based criminal histories for child welfare programs purposes.

LEGAL AUTHORITY

Federal

Social Security Act, 42 USC 671(a)(20)

Requirement to complete background checks before approval of any foster or adoptive placement and to check national crime information databases and state child abuse registries.

Criminal Justice Information Services (CJIS) Security Policy

Security requirements are outlined in The Criminal Justice Information Services Security Policy.

The transmission of Criminal History Record Information (CHRI) from Michigan Department of Health & Human Services (MDHHS) to Child Placing Agencies (CPA) for the purposes of foster home licensing and adoption is governed by the Adam Walsh Child Protection and Safety Act.

State

Child Care Organizations Act, 1973 PA 116, as amended, MCL 722.115h

Application for or to renew a license to operate foster family home or foster family group home; criminal history check required; procedures.

Child Care Organizations Act, 1973 PA 116, as amended, MCL 722.115k

Storage and maintenance of fingerprints; automated fingerprint identification system database.

Guardianship Assistance Act MCL 722.874

The approval process must include criminal record checks and child abuse and neglect central registry checks on the guardian and all adults

living in the guardian's home as well as fingerprint-based criminal record checks on the guardian.

DEFINITIONS

Authorized Personnel - individuals who are responsible for the licensing or approval of foster and adoptive parents who are approved to see Criminal History Record Information (CHRI).

Child Caring Institution (CCI) - a child care facility that is organized for the purpose of receiving minor children for care, maintenance, and supervision, usually on a 24-hour basis, in buildings maintained by the child caring institution for that purpose, and operates throughout the year. An educational program may be provided, but the educational program must not be the primary purpose of the facility. Child caring institution includes a maternity home for the care of unmarried mothers who are minors and an agency group home that is described as a small child caring institution, owned, leased, or rented by a licensed agency providing care for more than 4 but less than 13 minor children. Child caring institution also includes institutions for developmentally disabled or emotionally disturbed minor children. Child caring institution does not include a hospital, nursing home, or home for the aged licensed under article 17 of the public health code, 1978 PA 368, MCL 333.20101 to 333.22260, a boarding school licensed under section 1335 of the revised school code, 1976 PA 451, MCL 380.1335, a hospital or facility operated by the state or licensed under the mental health code, 1974 PA 258, MCL 330.1001 to 330.2106, or an adult foster care family home or an adult foster care small group home licensed under the adult foster care facility licensing act, 1979 PA 218, MCL 400.701 to 400.737, in which a child has been placed under section 5(6). (Act No. 116 of the Public Acts of 1973 as Amended)

Child Placing Agency (CPA) - a governmental organization or an agency organized under the nonprofit corporation act, 1982 PA 162, MCL 450.2101 to 450.3192, for the purpose of receiving children for placement in private family homes for foster care or for adoption. The function of a CPA may include investigating applicants for adoption and investigating and certifying foster family homes and foster family group homes as provided in this act. The function of a CPA may also include supervising children who are at least 16 but less than 21 years of age and who are living in unlicensed residences as provided in section 5(4). (Act No. 116 of the Public Acts of 1973 as Amended)

CJIS Systems Officer (CSO) - the individual located within the CJIS Systems Agency responsible for the administration of the CJIS network on behalf of the CJIS Systems Agency.

Criminal History Check - internet criminal history access tool (ICHAT) or equivalent check on that person from the state or province of resident.

Criminal Records Check - fingerprint-based check from the Federal Bureau of Investigation (FBI).

CHRI Media - any document, electronic file or database that contains Criminal History Record Information (CHRI) obtained through a State of Michigan and FBI fingerprint-based check.

Chief Administrator - individual in a CPA or CCI that makes daily decisions for the licensed facility or agency.

Licensee Designee - for an incorporated CPA or CCI the individual who is the representative of the corporation.

Local Agency Security Officer (LASO) - the primary Information Security contact between a local law enforcement agency and the Criminal Justice Information Services (CJIS) Systems Agency (CSA) under which this agency interfaces with the FBI CJIS Division. The LASO actively represents his/her agency in all matters pertaining to information security, disseminates information security alerts and other material to his/her constituents, maintains information security documentation (including system configuration data), assists with information security audits of hardware and procedures, and keeps the department informed as to any information security needs and problems.

Local Clearance - a criminal history completed by a specific jurisdiction only; for example, a court or local police station.

Secondary Dissemination - the transmission of CHRI from the Michigan Department of Health & Human Services (MDHHS) to Child Placing Agencies (CPA).

REQUIREMENTS FOR APPLICANT FINGERPRINTING

Fingerprints are required for all individuals applying to become licensed foster home parents or adoptive parents in the state of Michigan and chief administrators and licensee designees of Child Placing Agencies (CPA) and Child Caring Institutions (CCI). The Division of Child Welfare Licensing (DCWL) processes clearances using the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home form for licensed foster home applicants, domestic adoption applicants, international adoption applicants and using the DCWL-1326-CCI, Licensing Record Clearance Request Child Caring Institution or Child Placing Agency for

chief administrators and licensee designees of CPAs and CCIs and household members in foster and/or adoptive homes.

Note: Applicants and household members for international adoptions use the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home form but are not required to be fingerprinted through this process (international adoption applicants are fingerprinted through the United States' Department of Homeland Security).

The Federal Bureau of Investigation (FBI) policy; Criminal Justice Information Services (CJIS) Security Policy, mandates procedures for agencies that receive the results of fingerprint-based criminal history. The Michigan State Police (MSP) regulates the compliance with the CJIS Security Policy. The information contained in the results of the fingerprint-based criminal history is considered Criminal History Record Information (CHRI) in the CJIS Security Policy. CHRI is defined as "any notations or other written or electronic evidence of an arrest, detention, complaint, indictment, information or other formal criminal charge relating to an identifiable person that includes identifying information regarding the individual as well as the disposition of any charges." The CHRI must be held to the requirements in the CJIS Security Policy whether the results indicate a criminal history or no criminal history for the individual. The information contained in CHRI must be held to same level security whether it is the original document or if the information is transferred to another document.

Example: If the CHRI contained in the fingerprint-based criminal history is documented in the CWL-3130, Initial Foster/Adoption Home Evaluation, or the DHS-612, Adoptive Family Assessment Addendum, these documents must be held to security requirements in the CJIS Security Policy.

ITEMS THAT CONTAIN CHRI

This policy covers only CHRI received by MDHHS for child welfare (CW) purposes. The CHRI covered in this policy must be referred to as CW-CHRI.

CW-CHRI is received from the FBI through the MSP. CW-CHRI includes notation of a criminal history or no criminal history on the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home, or DCWL-1326-CCI, Licensing Record Clearance Request Child Caring Institution or Child Placing Agency, the email from the MSP with documentation of presence or no presence of a criminal history and the physical copy of the criminal history. When this information is transferred to documents such has the CWL-3130, Initial Foster/Adoption Home Evaluation, DHS-612, Adoptive Family Assessment Addendum, or into a database such as MiSACWIS or the Bureau Information Tracking System

(BITS) the security requirements are the same as with the physical document. If criminal history information listed in the fingerprint based criminal history is corroborated with information that is considered public then the criminal history information is considered public and can be shared.

Example: If a crime listed in the fingerprint-based criminal history is later located through a local clearance then the criminal history information can be shared according to the local security requirements.

Note: CW-CHRI is NOT to be stored in the child's adoption file, the foster care file or the CPS file. CW-CHRI is not typically needed in Juvenile Justice ases and should not be stored in a child's juvenile justice file.

APPLICANT FINGERPRINT PROCESS

The applicant fingerprinting process must be completed as indicated below:

1. All applicant(s) must first complete, sign and date an application either a BCAL-3889, Children's Foster Home License Application, OCAL-3502, Child Placing Agency Application, or a BCAL-1074, Child Caring Institution Application.

Note: The DHS-3153-a, Adoption Application, is **not** required to be completed prior to fingerprinting.

2. The applicant(s) then completes, signs and dates the Livescan Fingerprint Background Check Request RI-030. This document is required by the Michigan State Police (MSP) to verify that authorization has been given for fingerprinting.

3. The applicant(s) must then complete a CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home form or a DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency. A CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home or a DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency can only be given to an applicant when the application and Livescan Fingerprint Background Check Request RI-030 has been completed, signed and dated.

   Note: Applicant(s) must use the appropriate 1326 form indicating the reason for fingerprinting (adoption, foster care or chief administrators and licensee designees) per FBI policy requirements below:

- Adoption and foster care applicants must use the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home.

- Chief administrators and licensee designees for CPAs or CCIs must use the DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency.

The application, the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home or DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency and the RI-030 must be dated in the sequence above with the application signed first or all forms signed on the same day. **Fingerprint-based criminal clearances cannot be processed if the forms are signed out of order or after the fingerprints are completed.**

4. Following the completion of an application, the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home or the DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency and the RI-030, an appointment for fingerprinting is scheduled by the CPA worker or the applicant through the fingerprint vendor contracted with the state of Michigan. The applicant will receive a registration number.

   When scheduling a fingerprint appointment the correct reason code must be used. The correct code must be indicated on the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home or the DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency by using the correct check box.

   Reason codes:

   - **AWF** - to be used for foster home licensing with agency ID: 68465P

   - **AWA** - to be used for adoption through foster care with agency ID: 68464J

   - **AWP** - to be used for private domestic adoption with agency ID: 68466H

   - **DCL** - to be used for chief administrators and licensee designees of CPAs or CCIs with agency ID: 88695H

5. The applicant must take his/her registration number, the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home, or DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency, and the RI-030 to the appointment; a receipt which includes a TCN# (unique identifier for the fingerprint) will be provided to the applicant by the vendor. The TCN# is written on the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home or DCWL-1326-CCI, Licensing Record Clearance Request for Child Caring Institution or Child Placing Agency, and the RI-030 by the vendor.

6. All required documents are sent to the Division of Child Welfare (DCWL) Licensing by the CPA or DCWL consultant for processing.

   - For foster home licensing applicants and household members the worker must send the original 3889 - Children's Foster Home License Application, Livescans Fingerprint Background Check Request RI-030 for applicants and CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home by mail for DCWL for enrollment. DCWL address is 235 S. Grand Ave Suite 407 PO Box 30650 Lansing, MI 48909

   - For adoption applicants the worker can scan and email the CWL-1326 and RI-030 to adoption-DCWL@michigan.gov.

   - For CPA or CCI license applicants the DCWL consultant must send the appropriate application, the DCWL-1326-CCI, Licensing Record Clearance Request Child Caring Institution/Child Placing Agency and the RI-030 to DCWL central office.

If all the documents and dates are in order, the fingerprint-based criminal history results will be mailed back to the agency listed on the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home.

MISACWIS:
Secure Criminal History
Hyperlink

The CHRI results must be scanned and uploaded to the Secure Criminal History hyperlink in MiSACWIS.

APPLICANT CHALLENGE/ CORRECTION PROCESS

If an applicant believes his/her fingerprint based criminal history is incorrect or inaccurate the applicant should request a copy of his/her CW-CHRI information from the CPA or MDHHS county office.

The applicant must review and sign a Request to Challenge/Correction form prior to a worker providing a copy of the CW-CHRI. The applicant must also be provided with a copy of this form. This document informs the applicant of his/her right to challenge the information in CW-CHRI if they believe the information is inaccurate.

The applicant must directly contact the agency which provided the criminal history information in question. For assistance in obtaining criminal history information, applicants should contact:

- For out of state records:

  FBI, Criminal Justice Information Services Division
  ATTN: SCU, Mod. D2,
  1000 Cuter Hollow Road
  Clarksburg, WV 26306

- For state of Michigan records:

  - Call- Michigan State Police at 517-241-0606
  - Email- MSP-CRD-APPLEHELP@michgian.gov

CHRI Access to Authorized Individuals

General

All personnel requiring access to CW-CHRI must first be deemed an *authorized personnel*. Authorized personnel are individuals that are responsible for the licensing or approval of foster and adoptive parents, clerical, and managerial staff who support these functions and auditors/other vendors who have been approved by MSP to view CW-CHRI. Prior to access of CW-CHRI, authorized personnel must receive/complete the following items and have them filed in his/her personnel record:

- ICHAT results.
- Successful completion of Security and Awareness training.

Note: Authorized personnel access is denied if the individual has ever had a felony of any kind, no matter when it occurred.

LASO

The DCWL Local Agency Security Officer (LASO) oversees the statewide fingerprinting process for child welfare and insures compliance with MSP and FBI policy regarding fingerprints. The MDHHS Office of Human Resources (OHR) that serves MDHHS and the LASO will review any non-felony criminal history to determine if access to CW-CHRI is appropriate. Persons believed to be a fugitive of justice, or having an arrest history without conviction will be reviewed to determine if access to CW-CHRI is appropriate. The LASO may ask for review by the CJIS Systems Officer

(CSO) within MSP in extenuating circumstances where the severity of the offense and the time that has passed would support a possible variance.

Access to view CW-CHRI will be granted by the LASO so long as by providing access will not be detrimental to the agency or the individual for which the record pertains.

Subsequent Arrest/Conviction

Persons already having access to CW-CHRI and who are subsequently arrested and/or convicted of a crime will:

- Have his/her access to CW-CHRI suspended until the outcome of an arrest/allegation/charges are determined and reviewed by the LASO in order to determine if continued access is appropriate.
- Have his/her access to CW-CHRI suspended indefinitely or duties reassigned if a conviction results in a felony of any kind.
- Have his/her access denied by the CJIS Systems Officer (CSO) if she/he determines that access to CHRI by the person would not be in the public's best interest.

Screening Personnel

All personnel with access to CW-CHRI must be cleared through a criminal history check prior to receiving this access. CW-CHRI is contained in the documents received from the FBI and MSP which is attached to the CWL-1326, Licensing Record Clearance Request Foster Home/Adoptive Home form and is also included in the 3130 - Initial Foster/Adoption Home Evaluation and the 612 - Adoptive Family Assessment Addendum.

The MDHHS Office of Human Resources (OHR) and non-MDHHS CPAs human resource personnel must conduct a criminal history check of personnel who are newly appointed or at time of appointment or job change to a position with access to CW-CHRI. DCWL will monitor the screening of personnel with access to CW-CHRI.

OHR will use ICHAT to screen personnel. Personnel with a felony conviction are prohibited from viewing CW-CHRI. Any criminal history found for personnel seeking access to CW-CHRI must be reviewed by MSP or the DCWL LASO to determine if access is appropriate.

Contractors, vendors and external auditors will be held to the same screening requirements as child welfare staff who have access to CW-CHRI.

Personnel Training

All personnel, contractors, vendors and external auditors who have access to CW-CHRI are required to complete security awareness training (SAT). Training will be available on the Learning Management System (LMS) for MDHHS personnel and contractors with access to this system.

SAT is required to be taken within six months of being in a position with CW-CHRI access and every two years thereafter. CPAs are responsible for ensuring that all personnel with CHRI access completes the SAT. DCWL consultants will monitor completion of SAT in all CPAs as part of the annual licensing audit.

Internal & External Auditors

Auditors within MDHHS will be held to the same standards of security, training and confidentiality as all other personnel groups that have access to fingerprint-based criminal history. Auditors must provide a statutory basis for their specific requirement and need to view CHRI. External auditors must document how staff that view CW-CHRI receive a criminal history check and complete the SAT course. External auditors must also be reviewed and approved by DCWL and MSP for access to CW-CHRI.

Employment Termination/ Change

When a MDHHS or CPA employee is terminated from employment his/her access to CW-CHRI will be immediately terminated, using the DHS-50, Employee Departure Checklist.

CPAs are responsible for ensuring that all staff who have access to CW-CHRI have a cleared criminal history check when moving to a position with CW-CHRI access.

Sanctions for Personnel Non-Compliance

Persons found non-compliant with state or federal law, current FBI CJIS Security Policy, rules or regulations, including MDHHS policy regarding CHRI, may be formally disciplined. Discipline may include but is not limited to, counseling, reassignment of duties, dismissal, and/or prosecution. Discipline will be based on the severity of the infraction and at the discretion of the MDHHS Office of Human Resources (OHR) serving MDHHS and/or the CSO of the MSP.

HANDLING CHRI MEDIA

MiSACWIS meets the computer security and encryption requirements defined in the CJIS Security Policy. Data in MiSACWIS and Filenet is encrypted from storage until it is delivered to the user. Data at reset in the database is encrypted to AES256/FIPS-140-2 Complaint standards on the

SANS. When data is in flight between the database and application server it is encrypted to AES256 standard. When the data is delivered to the user's browser from the application server, it is delivered via HTTPS.

All MDHHS computers and systems are held to the security standards established by the Department of Technology, Management and Budget (DTMB). All MDHHS computers are held to the encryption standards in the DTMB Electronic Data and Encryption Technical Standard 1340.00.07. All computers and digital media are disposed of according to DTMB's Secure Disposal of Installed and Removable Digital Media Standard (former Ad Guide 1350.90) Technical Standard 1340.00.13. Both of the above technical standards can be found at:

http://inside.michigan.gov/dtmb/wr/psp/Pages/2_DTMB_IT_PSP.aspx

All licensed CPAs will be required to meet all computer encryption and destruction standards defined in CJIS.

Controlled Area Requirement

Electronic and physical CW-CHRI media must be securely stored within physically secure locations or controlled areas. Access to such media is restricted to authorized personnel only and secured at all times when not in use or under the supervision of an authorized personnel.

Controlled area is defined as a physically secure location where CHRI is stored and processed. If a secure location cannot be established then access to the area where CHRI is stored must be limited to authorized personnel. CHRI must be locked and secured when unattended and computer screens will be positioned in such a way to prevent unauthorized access or view.

Physical CW-CHRI Media

Physical CW-CHRI media must be stored in a separate file designated for CW-CHRI.

Physical media is defined as any physical/paper copies of documents that contain CHRI including but not limited to the physical results of the fingerprint-based criminal history, description and assessment of the fingerprint-based criminal history in the BCAL-3130 Initial Foster Home/Adoption Evaluation or the DHS-612, Adoptive Family Assessment Addendum.

Physical CW-CHRI media must be maintained in a secure location such as within a lockable filling cabinet, closet, office, safe or vault.

Note: CW-CHRI should only be in the adoptive families file and the foster home licensing file. It is NOT required to be stored in any other files.

Physical Media in Transit

Physical CHRI media must be transported from the LASO within DCWL at MDHHS central office to individuals determined to be *authorized personnel* in CPAs.

Transportation (the movement of physical CHRI media) of physical CHRI media from one office to another must occur through State of Michigan ID mail system or through the United States Postal Service in a sealed envelope.

Electronic CHRI Media

Electronic CHRI Media must be secured through encryption as specified in the CJIS Security Policy.

There are no electronic systems approved to store CW-CHRI other than DCWL for tracking purposes.

Electronic Media in Transit

CW-CHRI information is not to be stored in MiSACWIS. Electronic transmission of CHRI media over state of Michigan email is not permitted. The Bureau Information Tracking System (BITS) has been reviewed by DTMB and meets the security and encryption standards required by the FBI CJIS policy.

Non-MDHHS CPAs must ensure that computers, software, and email programs meet the requirements identified in CJIS Security Policy. The transmission of CHRI from MDHHS to CPAs for the purposes of foster home licensing and adoption is governed by the Social Security Act, 42 USC 671(a)(20) commonly referred to as the Adam Walsh Child Protection and Safety Act. The transmission of CHRI from MDHHS to CPAs is called secondary dissemination and occurs through the United States Postal Service in a sealed envelope; see Secondary Dissemination in this item.

Electronic Media Sanitization and Disposal

All computers and digital media are disposed of according to DTMB's Secure Disposal of Installed and Removable Digital Media Standard (former Ad Guide 1350.90) Technical Standard 1340.00.13. http://inside.michigan.gov/dtmb/wr/psp/Pages/2_DTMB_IT_PSP.aspx

Disposal of Physical Media

Physical CW-CHRI media will be retained by DCWL central office for 4 years following the date of the fingerprint.

Physical CHRI media retained by MDHHS or a CPA will be destroyed according to the retention schedule of the adoption or licensing file designated by rules or policy. When physical CHRI is destroyed it must be cross shredded by *authorized personnel*. Destruction of physical CHRI media must be documented in a destruction log maintained by DCWL, OHR, the MDHHS local office or the non-MDHHS CPA with CW-CHRI access.

Secondary Dissemination

Secondary dissemination is the transmission of CW-CHRI from one authorized agency to another. Transactions of secondary dissemination must be documented. The log must include the following:

- The date the record was shared
- Record disseminated
- Requesting agency (whom the response was shared with)
- The specific individual the CHRI is given to
- Method of sharing (U.S. Mail or physical person to person)
- Agency personnel that shared the CHRI

Examples of secondary dissemination include:

- MDHHS sharing fingerprint-based criminal history information with a MDHHS or non-MDHHS CPA for the purpose of foster home licensing or adoption.

- CPA sharing the results with a Michigan court for the purposes of adoption.

CPAs that receive CW-CHRI for the purposes of adoption and foster care are subject to the CJIS Security Policy requirements and will be monitored for compliance during the annual licensing audit.

CPAs are permitted to disseminate CW-CHRI with courts for the approval of adoptions or for foster home licensing, with other CPAs when a foster home license is transferred and when two or more adoptions are completed on the same family within the same year. CW-CHRI completed for foster home licensing may not be disseminated for adoption purposes or vice versa even within the same CPA.

Event Reporting & Escalation

When MDHHS or non-MDHHS CPA staff detect or confirm a breach in the security of the CW-CHRI, staff must immediately report the breach to his/her direct supervisor. The supervisor and management team of the MDHHS office or CPA must immediately secure CW-CHRI. The incident must be reported immediately to DCWL with the LASO being the primary contact. The email address for reporting security concerns to the LASO is: LASO-DCWL@michigan.gov.

DTMB technical procedure How to Handle a Security Breach-Procedure Number 1340.00.01.02.
http://inside.michigan.gov/dtmb/wr/psp/Pages/2_DTMB_IT_PSP.aspx

Communication Issuance 16-146 In Service Training Hours Requirement Changes and Monitoring in the Learning Management System

Child welfare caseworkers are required to complete 32 hours of in-service training per year; child welfare supervisors are required to complete 16 hours of in-service training per year. **The date range for monitoring this requirement is being changed from fiscal year to calendar year.** By December 31, 2016, all child welfare staff should have their in-service training hours documented in the MDHHS Learning Management System (LMS).
There continues to be problems with the historical child welfare training data from OTP/JJOLT. However, this will not impact in-service reports for calendar year 2016. There is no update available on the time frame in which the historical data will be merged into the LMS. An update will be provided once all historical training data is available through LMS.
Until then, please:
- Do not add external training to the LMS that was added to the OTP/JJOLT system prior to 12/1/15.
- Do not add pre-service institute, or any other OWDT provided training, as external training in LMS.
  - If this type of training is added to LMS, once the OTP/JJOLT data is transferred, LMS will have inaccurate hours counted toward in-service training requirement completion, and will result in duplicate records in individual transcripts.
  - Only OWDT can remove external training after it has been approved by the supervisor.

Training data from December 1, 2015 to present is available in the system. Therefore, in-service reports from LMS for calendar year 2016 are accurate to monitor staff in-service training hours.
To retrieve local in-service training reports:

Log into LMS
- Reports
- Standard Reports
- Training
- Training Hours
  - Date Criteria – Enter report date range
  - User Criteria –Select “Program” from the drop down menu
  - Using “plus arrow” Select “All Users in Program: Child Welfare (500)”
  - Select “Done”

- Advanced Criteria – select criteria to display in report
  - Suggested settings:

- Training Type: All
- Provider: All
- Recurring Training: Leave unchecked
- Group By: Summarize by User
- Status: Check only Completed and Completed (Equivalent)
- User Status: leave unchecked

Output – Export to Excel. The report may take a few seconds to a few minutes depending on the number of staff selected on and the length of the date range you selected.

- Once you receive a pop-up, select “Open,” then select “Yes.”
  - If you receive an Excel warning saying “Unable to read file,” please close out of the warning, and select Export to Excel again.
- The report will display any users who have completed training or recorded external training through LMS in the time frame you selected. The total in the far right “Training Hours” column is the cumulative total for that user.

Training coordinators have access to their agency based on the location identified in MiSACWIS. Only staff who have completed training on the new LMS will appear on in-service reports. Supervisors can also access this data for their direct reports.

Despite an extensive effort to make adjustments in the LMS, training coordinators will not be able to add external training for others. To add external training, each LMS user must manually add the training, then the supervisor will receive an email to approve it. Once approved, the external training hours will be included in the in-service report and the training will appear on the user’s transcript.

Contact the training help desk at MDHHSTraining@michigan.gov with questions about the LMS. Contact your Child Welfare Field Operations specialist (private agency) or Business Service Center analyst (MDHHS) with questions about training requirements.