

DFCS Office of Provider Management

RBWO Policy Violation Assessment Process Guide

The purpose of this guide is to provide Room Board and Watchful Oversight providers with a step-by-step description of the policy violation assessment (PVA) process. The information contained in this guide is derived from DFCS Child Welfare Policy Manual 14.22, which was effective March 2015. While it is intended to be as thorough and helpful as possible, providers are encouraged to contact any member of the Office of Provider Management (OPM) leadership team if you need clarification or encounter a situation not specifically covered by the guide.

Please note that as of December 14, 2015, the process for OPM notifying RBWO providers of the need for a PVA as well as how providers will submit completed PVA/CAP documents to OPM will be integrated into GA+SCORE. Specific changes are underlined below but in general, PVA-related communication and document submission will now be accomplished through each provider's secure GA+SCORE interface.

1. RBWO providers will typically be notified via a GA+SCORE-generated e-mail any time a PVA is required. PVA requests usually result from the occurrence of a maltreatment in care (MIC) allegation though they can be requested based on other concerns.
2. The PVA should be thought of as the standardization of a process RBWO providers should already be completing and not as an additional requirement. Any time an incident occurs that threatens or potentially threatens the safety and well-being of a child in care, this type of review should be completed as part of each agency's ongoing continuous quality improvement efforts.
3. Once a PVA request e-mail is received, the RBWO provider should begin the assessment as soon as possible but no later than 24 hours after notification. The nature of some events will require that the assessment begin immediately.
4. The PVA process runs parallel to the Child Protective Services (CPS) investigation process but has a separate timeline. While it is essential that RBWO providers participate in the PVA process, steps should be taken not to interfere with any CPS (or law enforcement) investigations that might be occurring at the same time.
5. When a MIC allegation against an RBWO foster parent is entered into SHINES by CPS, SHINES automatically places the home involved on hold for further placements. This hold will remain in place in SHINES at least until CPS enters its investigation determination, which can take 30 days (or longer in some cases) to occur. Unless you are otherwise informed, the home will be on hold for new placements but any current placements will be allowed to remain in the home.
6. Likewise, OPM will place any home involved in a MIC allegation on hold in GA+SCORE and this hold will remain in place until both the CPS investigation and the PVA process are complete. Providers should return completed PVA tools to OPM via GA+SCORE upload within 15 days of notification. Annual re-evaluations cannot be processed while a home is on hold.

7. When a MIC allegation against a group home staff member is entered into SHINES, agencies will be notified of the need to complete a PVA via a GA+SCORE-generated e-mail and the staff member should be suspended or assigned duties that do not require direct contact with group home residents. This determination should be made in conjunction with each provider's personnel management policy.
8. While its use is not required (though highly encouraged), OPM has developed a PVA tool to help walk providers through the assessment process. If a provider prefers to utilize its own assessment tool, care should be taken to ensure that it gathers at least the minimum information requested on the OPM PVA tool. A writable Word version of the PVA document can be found at www.gascore.com.
9. Once the PVA tool is completed, but within 15 days of receipt of the PVA request, providers should upload the completed assessment tool by logging into GA+SCORE, clicking *Risk Management* and then *PVAs*. Click the record for the PVA request. (You can also access this page using the link in the alert e-mail.) Fill in the required information and press *Upload* to send the PVA to OPM. Providers play an important role in gathering information related to child safety and well-being so they are encouraged to make the report as thorough and objective as possible.
10. The PVA completion process culminates in a provider making a determination as to whether a policy violation occurred. Once received in GA+SCORE, OPM will review the documentation within 10 days and notification will be sent out via a GA+SCORE-generated e-mail as to whether the determination is supported.
 - If the provider determined that no policy violation occurred and OPM supports this determination, no further action is typically required. However, there are instances where a corrective action plan will still be required even though no policy violation was found. OPM will typically communicate this need to providers via a GA+SCORE-generated e-mail.
 - If the provider determined that no policy violation occurred and OPM does not support this determination, notification will be sent out via a GA+SCORE-generated e-mail and a Corrective Action Plan will be requested. PVA related CAPs are due within 72 hours of being requested and providers should upload the completed CAP by logging into GA+SCORE, clicking *Risk Management* and then *CAPs/PIPs*. Click the record for the CAP request. (You can also access this page using the link in the alert e-mail.) Fill in the required information and press *Upload* to send the CAP to OPM.
11. The culminating event for both the CPS investigation and PVA processes is typically the 48-hour staffing. Every effort is made to hold this wrap-up staffing within two days of CPS making its final determination and the staffing should include participation by the RBWO agency involved. This staffing is also typically used to discuss any policy violations, CAP requirements and hold removal timelines.
12. Remember that even though a CPS investigation may return an unsubstantiated finding (or MIC allegations may have been screened out altogether), this only indicates that there was insufficient information or that the incident did not rise to the level of maltreatment. It may still be the case that a policy violation occurred and that a CAP is required.

13. All appeals to policy violation determinations and CAP requirements should be initiated by your agency within 10 days of receipt of OPM's initial determination. Appeals should be outlined in memo format and submitted to the OPM Director. OPM will review your appeal request with 15 days of receipt and notify you of its determination.

Again, OPM encourages you to incorporate the PVA process into your current continuous quality improvement efforts. Every effort should be made to develop policies and procedures that ensure objectivity and foster a supportive environment. As always, the ultimate goal is to contribute to the overall safety and well-being of the children in our care.

Thank you and we welcome any suggestions you may have on making this guide more useful. If you have any questions about the overall PVA process or the new GA+SCORE Risk Management interface, please contact the OPM Risk Management section at opmreports@dhs.ga.gov.