

ACCREDITATION OF PUBLIC CHILD WELFARE AGENCIES

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PURPOSE

To describe the accreditation process and possible implications of accreditation for public sector child welfare agencies.

BACKGROUND

This is a companion memo report to an OIG report on oversight of State Child Welfare Programs (OEI-01-92-00770). That report suggested that the Administration for Children and Families (ACF) find new ways to work with States to make program improvements and solve problems. One option we suggested was to require State child welfare agencies to be accredited, using accreditation bodies overseen by the ACF. This memo report is intended to supplement that report and provide more detailed information on the accreditation of child welfare agencies in general.

The Accreditation Process

Accreditation is a voluntary review process in which outside observers - peer reviewers who are trained, experienced professionals - survey and assess an agency's total operation using recognized criteria in the field.

Accreditation differs from licensing. Licensing is mandatory for private organizations, and is not a peer-review process. Accreditation goes beyond the requirements of State licensing, which normally establishes service "minimums." According to the Council on Accreditation of Services for Families and Children (Council), accreditation establishes a provider as a deliverer of "quality" service. While a licensing process generally occurs annually, accreditation reviews occur less frequently, e.g., every four years. Government-run child welfare agencies are not required to be licensed or accredited.

Accreditation of child welfare agencies, both public and private, has been performed since 1977 by the Council. The Council was created to establish an independent, objective process of agency review in the field of mental health and human services. The Council establishes requirements for accreditation that include standards which address all aspects of any agency's administration, organization, and program. The requirements are established through a process of consensus building in the field.

As of November 1993, the Council had accredited 26 public agencies, of which 25 were American and 1 was Canadian. Two of the accredited public agencies are State child welfare agencies, the South Carolina Department of Social Services, Office of Children, Family and Adult Services, and the Oklahoma Department of Human Services, Children's Services Unit.

The Council on Accreditation

A grant from the U. S. Department of Health, Education and Welfare for \$330,000 helped finance the founding of the Council. Since then, however, the Council has been essentially a private sector organization and is now supported by seven national, private sponsors. The sponsoring organizations are:

- o Association of Jewish Family and Children's Agencies
- o Catholic Charities USA
- o Child Welfare League of America
- o Family Service America
- o Lutheran Social Ministry System
- o National Committee for Adoption
- o National Association of Homes and Services for Children

METHODOLOGY

The information presented in this memo report was obtained through a literature review and interviews with recognized experts in the field of child welfare. Experts interviewed represented the following organizations:

- o Administration for Children and Families, HHS
- o Council on Accreditation
- o University of Iowa
- o Child Welfare League of America
- o American Humane Association
- o National Governors Association
- o American Bar Association
- o Annie E. Casey Foundation
- o Child Welfare Institute
- o Youth Law Center, San Francisco
- o Edna McConnel Clark Foundation
- o American Public Welfare Association (APWA)
- o Child Protective Services, State of Georgia
- o Office of the Assistant Secretary for Planning and Evaluation, HHS
- o Families First, a private child welfare agency
- o Adoption Services, Department of Family and Children Services, Fulton County, GA
- o Prevention of Unnecessary Placements Program, State of Georgia

Interviews with these experts addressed the process of accreditation per se, its effects, and/or the impact of accreditation on outcomes of child welfare cases.

FINDINGS

The Council On Accreditation Is Presently The Only Accrediting Body For Child Welfare Agencies

Any child welfare agency seeking accreditation must meet the Council's standards and pay their established fee for an accreditation review.

Accreditation Is A Demanding And Detailed Process

An agency must apply to the Council for an accreditation review. After the application has been approved, the Council determines the time necessary for and the scope of the review. The accreditation process performed by the Council is comprised of the seven steps listed below.

1. The agency seeking accreditation conducts a self study, using guidelines supplied by the Council.
2. A team of Council peer reviewers conducts an on-site review lasting at least two days, resulting in a report of compliance with the standards.
3. The agency prepares a response to the report.
4. A specialized Council committee considers the agency's response and makes a recommendation to the Council's trustees.
5. The trustees act upon the recommendation by approving or denying accreditation or deferring a decision pending remedial action.
6. Upon approval, the Council publishes the agency's name and notifies relevant individuals and organizations in the community of the approval.
7. The agency conducts a yearly review, based on the same standards used in the original review, and transmits the review material to the Council.

The entire review process must be repeated every four years.

Public sector agencies and private agencies holding all applicable State and local licenses that have been in operation for at least one year, delivering services in one or more of the areas included in the Council's standards, are eligible to apply for accreditation. The "Standards for Agency Management and Service Delivery" are divided into three broad categories:

- o Generic Organizational Standards
- o Generic Service Delivery Standards
- o Specialized Service Standards

The two categories of generic standards apply to all organizations. The specialized service standards set forth additional requirements for each specific service area.

In each of the three broad categories of standards there are three levels. At the primary level is a general statement summarizing the requirement of the standard. At the secondary and tertiary levels, the standards detail in increasing specificity how that requirement is to be met. A list of the titles of the primary level standards and some examples of secondary and tertiary standards are provided in Appendix A.

At the primary level there are 38 standards in all three categories combined. At the tertiary level there are more than 1,000 standards in all three categories combined. However, an organization would not have to meet all 1,000 tertiary standards to be accredited. An organization would have to meet all of the standards in the two generic categories, and the specialized standards for just its particular service area. For example, an agency providing day care services for the aging would have to meet all generic standards and 14 service-specific standards. An agency providing adoption services would have to meet all generic standards and 51 service-specific standards.

Opinions Vary On The Effects Of Accreditation For Public Child Welfare Agencies

The vast majority of accredited agencies are in the private sector. Approximately 604 agencies are currently accredited by the Council. As of November 1993, only 25 of those (4 percent) were in the public sector in the United States. One additional public sector agency was accredited in Canada.

The Council's literature states certain benefits derived from accreditation. Those benefits are as follows.

- o Assurance to clients, the public, funding bodies, governmental agencies, other professionals and agency volunteers that an agency meets rigorous standards. Further, accreditation demonstrates that an agency
 - has effective management,
 - is fiscally sound,
 - designs programs to meet community needs,
 - continually monitors and evaluates service quality,
 - has qualified personnel, and
 - has safe, accessible facilities.

- o A declaration that an agency cares deeply about its reputation as a provider of quality services and wants others to know of that achievement.

Of the experts we interviewed, one believed that accreditation per se had an effect on quality of services. That individual stated that accreditation has a positive effect on quality, but said that the effect was hard to measure.

On the other hand, most of the other experts we interviewed regarding the effects of accreditation raised questions about the benefits of accreditation for public agencies or expressed concern that the effect of accreditation on case outcomes could not be determined. They contended that accreditation makes no difference in how an agency performs. Some claimed that accreditation is sought primarily by organizations which have been successful and are performing well. Further, most of these experts agreed that accreditation does not guarantee positive outcomes in any child welfare case. Accreditation is more appealing to the private sector, they said, because it improves their chances of obtaining funding from organizations such as United Way.

Current Accreditation Standards Might Be More Stringent Than Those Used By Public Child Welfare Agencies

The Council's accreditation standards are possibly more stringent than those of some State merit systems, particularly those that govern public child welfare agencies' personnel policies and procedures. The Director of the Council stated that he believes there is a reluctance on the part of public agencies to seek accreditation because of a general fear that they cannot meet the standards, especially those regarding qualifications of their staff. To illustrate, the Council's personnel standards require that the head of each program have an advanced degree in a field such as social work education, another mental health discipline, medicine, nursing, family life, early childhood education, geriatrics, or another human service field. However, some State merit systems may allow a person to head up a program based on a combination of their education and experience. Where there are significant differences between State and Council education requirements, an agency might not be able to obtain accreditation without restructuring the State merit system.

Likewise, the Council's standards for quality assurance might be difficult for most public child welfare agencies to meet. To illustrate, the Council's standards require a quarterly internal review to assure, among other factors, the quality of case outcomes. The standards do not, however, specify how to measure outcomes.

Experts we interviewed stated that there is presently no consensus in the child welfare field regarding how to measure outcomes. They said that measuring outcomes is currently more art than science, and that there is no single common core of outcome measures in the field. Requiring accreditation would necessitate all public child welfare agencies to devise methods for measuring outcomes to meet the Council's standards, or the Department to develop and mandate standardized measures.

An Accreditation Review Generally Costs Around \$5,000

The fee for accreditation is calculated from a fee schedule. According to a Council official, accreditation generally costs around \$5,000 per "organizational unit." The review must be conducted every four years.

The Council's policy on what is a distinct organizational unit is not precise, however. It states that the organizational unit seeking accreditation must demonstrate that it is autonomous and independent. Autonomy and independence are established by a unit having "significant influence" over the establishment of policy, independent management, budgetary control, an appearance of autonomy, and/or a separate geographic identity.

How an accrediting organization would define a State child welfare system would determine how much an accreditation review would cost in any given State. To illustrate, all State child welfare agencies are organized differently. Some are divided administratively into State, county, area, field or district components. As a result, it is possible to have over one hundred individual organizations in a State that would need to be accredited under the present system, each at a cost of approximately \$5,000 per organization every four years. With the data currently available, we are unable to estimate with any precision the cost to accredit all public child welfare agencies nationwide.

CONCLUSION

At this time, no one has sufficient information to ascertain fully the benefits of and barriers to accreditation for public child welfare agencies. Accreditation might be a valuable mechanism for improving the performance of State child welfare agencies; however, the barriers to accreditation for public child welfare agencies should be weighed against the benefits.

Possible Benefits

Mandatory accreditation for public child welfare agencies could possibly accomplish the following.

- o Require public child welfare agencies which are presently operating below accreditation standards to make changes to meet those standards.
- o Provide public child welfare agencies with an explicit set of resource requirements. Such information would enable State legislatures to better determine costs and decide on an appropriate level of support.
- o Necessitate development of outcome measures in all public child welfare agencies which do not currently have them.

Possible Barriers

Requiring State child welfare agencies to become accredited could potentially meet with some barriers, such as the following.

- o Create conflicts or discrepancies between personnel standards and State merit systems, requiring modifications in State merit systems.
- o Require State agencies to develop outcome measures to meet all quality assurance standards for accreditation, or require the Department to develop standardized measures which all public child welfare agencies would have to use.
- o Cause States or the Department to incur a considerable expense for accreditation reviews of all child welfare agencies nationwide, based on current fees.
- o Failure to support public child welfare agencies might cause loss of accreditation. A loss of accreditation and failure to pass an accreditation review might increase vulnerability to lawsuits.

Issues Requiring Further Study

Prior to making a commitment to accreditation, more information, both pro and con, is needed. Areas of concern which need to be addressed follow.

- o Does accreditation as presently performed by the Council lend itself to public sector child welfare agencies.
- o What benefits or barriers have been experienced by the 25 public sector agencies in the United States which already have obtained accreditation.
- o Would it be desirable for each State to develop its own outcome measures, if accreditation were mandatory.
- o How would accreditation relate to reviews of public child welfare agencies currently conducted by States or the Department.
- o Would it be worthwhile or preferable to encourage another organization besides the Council to perform accreditation of child welfare agencies.
- o To what extent would State child welfare agencies require accreditation of private agencies with which they contract for child welfare services.

ACF can obtain needed information and begin to resolve these issues by

- o analyzing the benefits of accreditation for those public sector child welfare agencies which already have obtained it,
- o evaluating possible barriers to accreditation, and
- o developing a consensus on appropriate outcome measures for child welfare cases which would satisfy both public and private advocacy organizations. The Council has expressed an interest in collaborating with the Department in developing outcome measures in any of the areas of service they accredit, including child welfare.

APPENDIX A

Titles for Primary Level Standards and Examples of Secondary and Tertiary Standards

This list contains the headings for the 38 primary level standards. Some examples of secondary and tertiary level standards follow the primary headings, and a complete list may be found in the Council's publication, "Standards for Agency Management and Service Delivery."

GENERIC ORGANIZATIONAL STANDARDS

- o The Agency in the Community
- o Agency Governance and Administration
- o Personnel
- o Quality Assurance
- o Fiscal Management
- o Facilities and Equipment

GENERIC SERVICE DELIVERY STANDARDS

- o Intake and Assessment
- o Service Planning
- o Implementation of the Service Plan, Termination and Aftercare
- o Client Information and Confidentiality

SPECIALIZED SERVICE STANDARDS

- o Community Organization Service/Social Advocacy Service
- o Information and Referral Service; Crisis Intervention Service; Emergency Telephone Response System
- o Emergency Shelter Service for Abused and Neglected Children; Emergency Shelter Service for Homeless Individuals and Families

- o Foster or Group Care for Unaccompanied Minor Entrants or Refugees
- o Group Home Service; Residential Center Service for Children and Youth
- o Residential Treatment
- o Pregnancy Counseling and Supportive Service
- o Adoption Service
- o Independent Living Service for Youth

EXAMPLES OF SECONDARY LEVEL STANDARDS

Each of the 38 primary standards have a set of secondary level standards. To illustrate, the fourth primary standard above is quality assurance. The secondary level standards for quality assurance are

Management
Information
System:

The agency maintains information necessary to plan, manage, and evaluate its programs effectively.

Planning and
Evaluation:

The agency determines whether the agency's services are needed and evaluates the effectiveness and efficiency of the agency in achieving its purposes and/or mission.

Quality
Assurance
Program:

The agency has a quality assurance program to assure that individual client services meet the agency's expectations as to service quality and outcomes.

Remediation:

Action is taken to eliminate or ameliorate problems identified in program evaluation and in review of the quality of individual client services, including, as appropriate:

- o Revision of policies and/or operational procedures;
- o Changes in personnel assignments, personnel supervision, or in-service training; and
- o Modification, addition or deletion of a program or service.

Client
Protections
in Research:

When an agent participates in human subject research, the agency exhibits due regard for client privacy and the right of the client to participate on a voluntary basis.

EXAMPLES OF TERTIARY LEVEL STANDARDS

Each secondary level standard has a set of tertiary level standards. For example, the following tertiary level standards are established for the secondary standard "Quality Assurance Program."

Written Plan or
Outline:

The overall scope of the quality assurance program is described in a written plan or outline which sets forth:

- o mechanisms, committees, or other means of assigning responsibility for carrying out and coordinating quality assurance activities;
- o objectives and scope of the activity;
- o methods of monitoring used;
- o reporting of results; and
- o follow-up mechanisms.

Quarterly Internal
Review:

On a quarterly basis, agency management, designated supervisory personnel, or a peer team conducts an internal review of randomly selected open cases for the quality of the client assessments, case or service planning, services provided or obtained, outcomes, and aftercare planning.

Written Criteria:

The agency has established written criteria, such as thresholds, benchmarks, or timeliness, which trigger further review or evaluation of problem areas by management when a case or cases are not in compliance with those criteria.