IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

B.H., et al.,)	
Plaintiffs,)	
v.)	No. 88 C 5599
B.J. WALKER, Acting Director,)	Hon. Jorge L. Alonso Judge Presiding
Illinois Department of Children and Family Services,)	3
Defendant.)	

PLAINTIFFS' MOTION TO ENFORCE CONSENT DECREE

Plaintiffs, a certified class of children in the custody of the Illinois Department of Children and Family Services ("DCFS" or the "Department"), hereby move to enforce the B.H. Consent Decree. Paragraph 26(a) of the Decree limits assignments to each DCFS child protective services investigator ("Investigator") as follows: (i) no more than 12 new abuse or neglect investigations per month during nine months of a calendar year; and (ii) in each of the remaining three months of the calendar year, no more than 15 new abuse or neglect investigations may be assigned." *Id.* at ¶ 26(a). For the reasons set forth below, Plaintiffs request entry of an order finding the Department in substantial violation of Paragraph 26(a) and requiring the Defendant, Acting Director Walker, to take immediate corrective action to address that violation.

Immediate Relief Is Required

The Decree's limitation on assignments to Investigators matters. Not only is it a binding, court-enforceable agreement that the Department voluntarily undertook, it matters because it

¹ The Restated Consent Decree, available at Dkt. 458-2, is referred to herein as the "Decree."

directly impacts child safety. The limits in Paragraph 26(a) are consistent with the Child Welfare League of America's recommended caseload standard for Investigators, which caps assignments at no more than 12 active reports per month.² The Investigator caseload standard set by the Council on Accreditation for child welfare agencies like DCFS is even lower, contemplating that "[g]enerally, investigative workers should manage no more than 12 active investigations at a time, including no more than 8 new investigations per month." And Illinois' Inspector General for the Department of Children and Family Services recently commented on the consequences of what she viewed as the Department's persistent overburdening of Investigators beyond the B.H. limits, saying that the practice "create[s] a toxic work environment in which it is foreseeable that some investigators will take dangerous shortcuts that can lead to lethal errors." See OIG File No. 2016-IG-2769, p. 149 (excerpt attached as Ex. 3).⁴ The Inspector General's assessment is not overly dramatic: Questions linger as to whether error by overloaded Investigators was a material factor leading to the tragic deaths of three children – Sema'j Crosby, Manuel Aguilar, and Jazmine Walker - as highlighted by the Chicago Tribune's reporting earlier this year.

² See Hughes, S. and Lay, S., Direct Service Workers' Recommendations for Child Welfare Financing and System Reform, January 2012, at p. 5 (attached hereto as Ex. 1).

³ See Council on Accreditation, Standards for Public Agencies, Child Protective Services, PA-CPS 14.05, "Interpretation" (attached hereto as Ex. 2). The Council's standard sets a 30-day limit for completing investigations, and states that investigators should be assigned a "manageable workload" that considers the complexity of the cases assigned and would allow the investigator to meet the 30-day target. *Id.* at PA-CPS 5.07, PA-CPS 14.05.

⁴ The Department responded to these concerns by rejecting that portion of the report and accompanying recommendations relating to Investigators' caseloads, asserting that the OIG "has no authority under rule or procedure to make determinations about whether DCFS is in compliance with the terms of the B.H. Consent Decree." *Id.* at 149, 150. The Department also explained, however, that it was working to remedy the assignment overloading by "attempting to staff child protection investigators at a ratio of 10:1" and attempting to fill vacancies using that ratio. *Id.* at 154.

DCFS' non-compliance with the limits in Paragraph 26(a) has been a recurring issue. This Court last entered an Order approving an implementation plan to reduce excessive Investigator caseloads in 2012 (the "2012 Plan"). See Dkts. 461 (proposed Plan), 468 (Order approving Plan). Four years later, at Plaintiffs' urging, the Department again undertook to address excessive caseloads in the spring of 2016. See Ex. 3. Sadly, however, the Department's sporadic efforts to recruit and retain a sufficient workforce of Investigators have not produced a lasting solution.

Since spring of this year, Plaintiffs again have been pressing the Department for data on Investigator assignments. The Department now has provided reports confirming that it is violating the Decree at a wholly untenable level. The Department's report for Investigator assignments through the end of October, 2017, lists 666 Investigators. Even limiting review only to assignments made in the five-month period from June to October, 2017 – which significantly understates the Department's non-compliance for this calendar year – the data show that as many as 1,950 separate assignments have been made in violation of the Decree. See infra at ¶ 32; see also Affidavit of H. Dalenberg, attached hereto as Ex. 4, at ¶3 and Exhibit X thereto. And the Department's preliminary data for November, 2017 do not show significant improvement.⁵

Plaintiffs have attempted to work with the Department over the last several months to reach an agreed resolution to this problem. *See infra* at ¶¶ 1-13, 15-31. Those efforts were interrupted by Director Sheldon's resignation from the Department in June of this year, and then resumed with the appointment of Acting Director B.J. Walker. Under Acting Director Walker's leadership, the Department has taken some new steps to change its hiring practices (*see infra* at ¶¶ 10-13, 15-31),

⁵ The Department provided Plaintiffs with data for November, 2017 after 5:00 p.m. on December 6, 2017. The report underreports assignments made in violation of the Decree, however, and for that reason the report is not provided herewith. Plaintiffs have asked the Department to provide corrected data.

and Plaintiffs are hopeful that those changes may provide some improvement in the long term.

That potential improvement, however, cannot yet be measured, much less treated as an effective cure.

Although the Department has hired some new Investigators, it has not provided data from which one can evaluate whether its assessment of its hiring needs is sound *or* whether its hiring is keeping pace with attrition. *See infra* at ¶¶ 16-17. The Department has not answered Plaintiffs' inquiries in that regard (*id.*), but its past practices strongly suggest that the Department has planned for hiring and staffing based on wholly unsound assumptions. *Id.* at ¶¶ 16-17, 24-28, 31. Similarly, the Department is using a patently unsound methodology when attempting to track which workers are "at risk" for receiving assignments above the B.H. limits on a worker-by-worker basis. Indeed, the Department's methodology identifies workers as *not* being at risk when they already have had as many as a dozen assignments in violation of the Decree. See infra at ¶ 32.

Finally, even as the parties wait to see whether the Department's hiring reforms eventually will result in adequate staffing levels, the Department's near-term response to the critical shortage of Investigators, has been and remains wholly inadequate. Earlier this year, the Department took the interim measure of "detailing" or specially assigning Investigators from various offices with a lighter volume of work to locations where the violations of Paragraph 26(a) were most severe. See infra at ¶ 33. That "detailing" did not bring the Department anywhere close to compliance with Paragraph 26(a). Even with special detailing in place, in October 2017 alone at least 170 Investigators were given assignments exceeding the Decree limits, and 40 of those Investigators were assigned 20 cases or more. Id. at ¶ 33. And the preliminary data for November do not show substantial improvement – by Plaintiffs' count, there again were approximately 170 workers who received assignments in excess of the B.H. limits in November 2017, with more than 90 of those

workers receiving more than 15 assignments in that single month. And now, the Department appears to be allowing nearly all supportive "detailing" to expire. See n. 5, supra, see also infra at ¶ 27, 31.

The parties' attempts to negotiate an agreed solution to the Department's critical shortage of Investigators have broken down. While the Department's most recent communication on this issue does not directly deny that it is in substantial violation of Paragraph 26(a), the Department apparently deems its corrective efforts to be sufficient. See infra at ¶¶ 3-31. The Department stated that it is willing to continue "advising [Plaintiffs] of the status of hiring, in addition to ongoing monthly reporting of investigative caseloads by worker," but "does not believe that a court ordered implementation plan is necessary." Id. at ¶ 30. Plaintiffs disagree. The Department's data shows it is in substantial violation of the Decree, it has failed to take interim measures sufficient to materially reduce the extent of its Decree violation, and it has not provided analysis or data supporting the assumption that its recent hiring activity will, in fact, bring the Department within compliance by a specified date. Plaintiffs accordingly seek relief from this Court to require further, immediate corrective action by the Department.

The Relief Sought

Plaintiffs request that this Court enter an Order making the following findings and granting immediate relief to the Plaintiff Class as follows:

- The Department is in substantial non-compliance with Paragraph 26(a) of the Decree.
- Plaintiffs have satisfied the requirement in Paragraph 68(d) of the Decree in respect
 to notifying the Department of its substantial non-compliance and attempting to
 negotiate an agreed resolution therefor.
- By January 10, 2018, the Department shall provide Plaintiffs and the Court with a
 revised methodology for determining its staffing needs for all investigative teams
 and offices across the State, and shall demonstrate that (i) its revised methodology
 only considers case-carrying staff, and (ii) that it adequately anticipates and takes

into consideration by team and office such factors as worker attrition, time required to train new hires before assignment of cases, use of interns, and worker unavailability (e.g., due to illnesses or leaves of absence).

- By January 10, 2018, the Department shall provide Plaintiffs and the Court with documentation demonstrating that it has provided interim support to all investigative teams and offices across the State, where needed, that is sufficient to bring caseload assignments within the limits set by Paragraph 26(a). Such interim support may include "detailing" of Investigators to different offices based on need, emergency rehiring of recently retired workers, and/or "detailing" assignment of appropriately credentialed and previously trained Investigators who presently are employed by the Department in other positions.
- Beginning on January 10, 2018, and on the tenth of each month thereafter until further order of this Court, the Department shall provide Plaintiffs and the Court with a report accurately identifying on a rolling 12-month basis the number of the investigative assignments for each individual Investigator. The report further shall (i) identify each month in which a worker was assigned investigations in excess of the Paragraph 26(a) limits for the referenced 12-month period; and (ii) include a column totaling (year to date) the number of assignments for the worker that exceeded the Paragraph 26(a) limit for the twelve-month period.
- By May 1, 2018, the Department shall provide the Court and Plaintiffs with documentation sufficient to demonstrate that the Department's revised hiring practices have achieved and are sufficient to maintain the Department's ongoing compliance with Paragraph 26(a).
- The Department shall confer with Plaintiffs in developing the plans, practices, and documentation referenced in this Order. The Department's submissions shall be presented as agreed submissions where possible, and Plaintiffs shall be provided a draft of the Department's proposed submission at least five business days before the submission is due. Where agreement is not achieved, Plaintiffs shall submit their objections to the Department's submission on the date that the Department's submission is due.

Statement of Additional Facts Supporting the Requested Relief

A. The Limit on Assignment of Investigations Relates to Child Safety.

- 1. Under the Consent Decree, the Department committed to limiting the number of new abuse or neglect investigations that may be assigned to an Investigator. See Decree, Dkt. 458-2, at ¶ 26(a). The limit is as follows:
 - a. By July 1, 1993, each DCFS child protective services investigator will be assigned no more than 12 new abuse or neglect investigations per month during nine months of a

calendar year. During the other three months of the calendar year, the investigator will be assigned no more than 15 new abuse or neglect investigations per month.

Id.

2. By allowing assignment of as many as 15 investigations for three months in a year, the limit is crafted to allow DCFS sufficient flexibility to manage around such foreseeable circumstances as fluctuations in the level of abuse and neglect reports received, worker illnesses, leaves of absence, worker attrition, and the like. *Id*.

B. The Department's 2012 and 2016 Efforts to Achieve Compliance

- 3. This Court last ordered the Department to take curative action addressing its violation of Paragraph 26(a) of the Decree in 2012. See Dkt. Nos. 461, 468. At that time, the Department acknowledged its non-compliance and the parties negotiated a plan providing for interim relief (including temporary hiring of retired child protection workers through emergency, short-term contracts) and a hiring plan intended to bring the Department into sustained compliance with the Decree. See Dkt. 465-1. A copy of the curative implementation plan from 2012 is attached hereto as Ex. 5.
- 4. In April, 2016, Plaintiffs notified the Department of new concerns regarding assignments to Investigators. See Ex. 3. The Department provided data that, in Plaintiffs' view, demonstrated that the Department again was violating the Paragraph 26(a) limits. Id. The Department agreed to take corrective action. Id.

C. The Department's Misreporting of B.H. Compliance in 2017

- 5. On May, 11, 2017, Plaintiffs again asked the Department to provide up-to-date reports on assignments to Investigators. See Ex. 4 at ¶ 3 and Ex. A thereto.
- 6. On June 5, 2017, approximately three weeks after the date of Plaintiffs' request, the Department provided data reports regarding Investigators' assignments. See Ex. 4 at ¶ 3 and Ex.

B thereto. The reports, however, were unusable. The reports did not show assignments by caseworker; rather, they only showed "average" assignment figures for workers in particular offices. *Id.* Plaintiffs promptly informed the Department that the June 5, 2017 reports did not demonstrate compliance and were not informative. *See* Ex. 4 at ¶ 3 and Ex. C thereto. Plaintiffs explained that the Decree sets assignment limits *by individual worker*, and demanded reports providing assignment data in that format. *Id.*

7. On June 12, 2017, the parties participated in a conference call for further discussion of assignments to Investigators. See Ex. 4 at ¶ 4. In that call, the Department disclosed that in addition to fully qualified Investigators, it had been assigning investigations to 60-70 "interns" who did not have all the credentials necessary for the position of Investigator. Id. Further, the Department disclosed that supervisors were not required to apply the Paragraph 26(a) limits for the interns' assignments. Id. Plaintiffs objected to the Department's disclosure regarding the interns as a flagrant and dangerous violation of the Decree and demanded that the Department issue notification by the following day clarifying that assignments to interns were subject to and limited by Paragraph 26(a) of the Decree. See Ex. 4 at ¶ 3 and Ex. D thereto. The Department complied with that request. See Ex. 4 at ¶ 3 and Ex. F thereto.

D. Plaintiffs' Notification to DCFS Regarding the Department's Non-Compliance.

8. On June 12, 2017, the Department also provided additional data reports regarding assignment of investigations. See Ex. 4 at ¶ 3 and Ex. E thereto. The format of this report showed the compliance status under Paragraph 26(a) for each individual worker for FY 2016 and FY 2017. Id. Plaintiffs reviewed that data and on June 14, 2017, Plaintiffs provided the Department with written notification pursuant to Paragraph 68(d) of the Decree that Plaintiffs deemed the Department to be in substantial violation of the limits on assignments to Investigators. See Ex. 4

at ¶ 3 and Ex. G thereto. Plaintiffs asked the Department to meet and to enter into negotiation of a plan to cure its non-compliance. *Id*.

E. The Attempt to Negotiate a Solution for the Department's Non-Compliance.

- 9. On June 15, 2017, Director Sheldon resigned from DCFS. Governor Rauner appointed Acting Director Walker to replace Director Sheldon effective June 26, 2017. Plaintiffs promptly asked to meet with Director Walker. See Ex. 4 at ¶ 3 and Ex. J thereto.
- 10. On June 26, 2017, the Department forwarded updated reports showing Investigators' caseloads for calendar year 2016 and calendar year 2017 through May. See Ex. 4 at ¶ 3 and Ex. H thereto. Plaintiffs responded on June 30, 2017, asking that the Department further provide previously requested data regarding (i) use of interns to perform investigations, (ii) Investigator position turnover / vacancies (by office and region for the last two years), and (iii) the open job postings for the Investigator position (by office and region for the last two years). See Ex. 4 at ¶ 3 and Ex. I thereto.
- 11. The parties met on June 27, 2017 to discuss issues regarding investigative caseloads. See Ex. 4 at ¶ 3 and Ex. J thereto. At that meeting, Plaintiffs again asked to meet with Director Walker, and further requested a written description of the activities that the Department had undertaken to address excessive caseload assignments. Id. The Department agreed to provide that information, but would not agree to commit to negotiation of an implementation plan in respect to Paragraph 26(a). Plaintiffs asked that the Department make that commitment by July 11, 2017.

F. The Department Denies Non-Compliance Based on Misapplication of the Decree, but Agrees to Take Action

12. The Department wrote to Plaintiffs on July 14, 2017 expressing commitment to address "child protection staffing and caseloads" and outlining the steps it was taking in that

regard. See Ex. 4 at ¶ 3 and Ex. K thereto. The Department outlined efforts to streamline hiring practices (e.g., continuous posting of positions, acceleration of the grading process for applications). Id. The Department described a new initiative by which it was negotiating with AFSCME to create "pools" of "Deferred Assignment Investigators" or "DAIs." Id. The concept provided for the DAIs to be assigned to vacancies at the point that the vacancy would be filled through external hiring (rather than internal transfers or reassignments of existing DCFS employees). Id. The concept is intended to keep a "pipeline" of available hires available, such that vacancies are filled more promptly than otherwise would have been possible. The remainder of the Department's July 14, 2017 response to Plaintiffs described steps the Department was "reviewing" or "considering." Id.

- 13. Through its July 14, 2017 letter, the Department also took the position that it "has been in 'substantial compliance' with the B.H. caseload provisions for CPS" since April 28, 2016. Id. Again, however, the Department's purported support for that position was based on average caseloads across regions and statewide. Id. Plaintiffs already had informed the Department that such averages do not demonstrate compliance with Paragraph 26(a), which sets limits on caseload assignments by individual worker. See Ex. 4 at ¶ 3 and Ex. C thereto.
- 14. The averaging technique that the Department relied upon for its claimed compliance with Paragraph 26(a) is worse than merely uninformative it is downright misleading. For example, for March 2017, the "average" number of investigations assigned to workers in the Northern Region reportedly was 11.9 per worker. See Ex. 4 at ¶ 3 and Ex. K thereto (DCFS Letter with exhibits, at page 1 of Exhibit C thereto). But for the workers in the Rockford Teams 1A 15 and 1A 55, the individual assignments were as follows:

Worker	Northern Region "Average" Assignments March 2017 ⁶	Worker's Actual Assignments in March 2017 ⁷	Worker Assignments Exceeding Limits June – October 2017 ⁸
SAL***	11.9	13	24
BUR***	11.9	15	19
MAR***	11.9	14	32
SAU***	11.9	15	13
SEE***	11.9	21	40
MOR***	11.9	18	0
RED***	11.9	0	0
BOL***	11.9	12	11*
PON***	11.9	22	37
STE***	11.9	19	0*

^{*}Highlight denotes Intern

Plainly, using "averaging" across regions (or even across teams) obscures data that otherwise shows obvious and significant violation of the Decree's assignment limits and dangerously understaffed teams.

15. On July 14, after reviewing the Department's correspondence of that date, Plaintiffs challenged the Department's continued use of "averaging" to evaluate its compliance with Paragraph 26(a) of the Decree. See Ex. 4 at ¶ 3 and Ex. L thereto.

⁶ See Ex. 4 at ¶ 3 and Ex. B thereto.

⁷ See Ex. 4 at $\P\P$ 7-8 and Ex. X thereto, at p. 14.

⁸ See Ex. 4 at ¶¶ 7-8 and Ex. X thereto, at p. 14.

- 16. On July 20, 2017, Plaintiffs met with the Department, with Acting Director Walker in attendance. See Ex. 4 at ¶ 5. Acting Director Walker confirmed that in her view, the "averaging" approach that the Department had used to assess non-compliance with Paragraph 26(a) of the Decree was not sound. Id. Plaintiffs asked the Department for an explanation of how it had assessed its hiring needs and the status of its efforts to fill vacancies it had identified. See Ex. 4 at ¶ 3 and Ex. L thereto. Plaintiffs noted that to date, the data DCFS had provided consisted of a set of lists, one naming individuals in the hiring "pipeline," and another identifying workers leaving the Investigator position no analysis was offered to match the two, and no explanation was given to explain how the Department calculated the number of vacancies it needed to fill. Id. As of the filing of this Motion, no such explanation has yet been provided to Plaintiffs.
- 17. The absence of specifics regarding the Department's hiring planning is significant. As of 2016, the Department's hiring and staffing planning apparently was based on a ratio of 10:1 cases per Investigator. See Ex. 3 at p. 154. The Department has not disclosed whether such a ratio still is being used, whether it is a statewide ratio, or how such a ratio can properly identify *localized* hiring needs. Workers are hired for specific locations, so hiring analysis must take into consideration local conditions. And given that the Department's prior use of averaging was wholly inadequate to measure B.H. compliance at the worker level (see supra ¶ 14), there is no reason to presume that use of averaging is any more trustworthy or appropriate when assessing hiring needs.
- 18. Moreover, according to the hiring process that the Department says it is bound to follow, it takes time to move candidates for Investigator positions through the hiring pipeline. *See* Ex. 3 at pp. 154-56. The Department has been using "continuous postings" for some time in order to reduce the time needed, and also has taken steps to reduce delay in the step required for the State's "scoring" of applicants. *Id.* But even after a position is posted, interviews are conducted,

candidates are identified, the State has "scored" the applications, and the worker is hired, the worker *still* must conduct extensive training before he or she can begin handling investigations. *Id.* Thus, even when a position is filled, that does not translate into immediate availability for work.

G. The Department's Proposed Plan.

On August 3, 2017, the Department provided Plaintiffs with updated assignment 19. data for Investigators (through June, 2017), a "2017 Plan to Monitor and Reduce Investigative Caseloads," and a training and assignment protocol that the Department intended to use for interns handling investigations. See Ex. 4 at ¶ 3 and Ex. M thereto. The Plan stated that a "Caseload Reporting Tool" had been developed to allow easy identification of excessive assignment to Investigators – apparently by reference to a column providing a total of all assignments to any given worker year-to-date for the calendar year. Id. Management was expected to review and analyze this data for purposes of assessing staffing needs. Id. The Plan also repeated the Department's initiative for Deferred Assignment Investigators, outlined modifications to the work experience requirements for the Investigator position that were intended to increase the pool of available applicants, and streamlining of administrative steps related to DCFS' hiring process. *Id.* Finally, the Plan identified (i) "detailing" of various workers to other locations to alleviate worker shortages in various field offices, including Urbana, Peoria, Waukegan, Elgin, (ii) arrangements allowing overtime pay in various offices, and (iii) various additional modifications shifting responsibilities and assignments among workers and offices. *Id.*

⁹ Plaintiffs believe that the initial training period lasts approximately four weeks, and requested confirmation of that point, but received no response from the Department. See Ex. 4 at ¶ 3 and Ex. T thereto.

20. On August 11, 2017, the Department informed Plaintiffs that a "Deferred Assignment Investigator" arrangement had been reached for downstate regions. See Ex. 4 at ¶ 3 and Ex. N thereto.

H. Plaintiffs' Monitoring of Assignments for Reduction in Non-Compliance.

- 21. Following receipt of the Department's Plan, Plaintiffs monitored the Department's reports showing assignment of investigations by individual worker. On September 7, 2017, the Department provided updated reports regarding assignment of investigations, and on Monday, September 11, 2017, the Department confirmed that for purposes of assessing compliance with Paragraph 26(a), the appropriate version of the Department's reports of investigation assignments to review was the "Newly Assigned Cases 72 Hours" report. See Ex. 4 at ¶ 3 and Ex. O thereto.
- 22. On Thursday, October 12, 2017, Plaintiffs asked the Department to provide updated reports regarding assignment of investigations. See Ex. 4 at ¶ 3 and Ex. P thereto. On October 20, 2017, the Department provided those updated reports with data from January 2017 through September 2017. See Ex. 4 at ¶ 3 and Ex. Q thereto. The Department further agreed to provide an update regarding the status of its hiring efforts.
- 23. On November 7, 2017, the Department notified Plaintiffs that updated reports of investigation assignments were available, with data from January 1 through October 31, 2017. See Ex. 4 at ¶ 3 and Ex. R thereto.
- 24. On November 8, 2017, Plaintiffs' counsel notified the Department that the assignment levels exceeding the B.H. limits remained unacceptable. See Ex. 4 at ¶ 6. Plaintiffs asked the Department to make a commitment, in writing, to develop an implementation plan for submission to the Court in order to address what Plaintiffs viewed as the Department's insufficient efforts to address its ongoing violation of Paragraph 26(a) of the Decree. Id. The parties later

agreed that by November 14, 2017, the Department at the least would give a *date* by which it would say *whether* it would make such a commitment. *Id.*

- 25. Following the parties' call on November, 8, 2017, the Department provided its update regarding its hiring efforts and the "detailing" assignments in place. See Ex. 4 at ¶ 3 and Ex. S thereto.
- 26. As to hiring, the Department's update stated that there were 60 positions vacant statewide as of November, 8, 2017. *Id.* Of those, 22 positions reportedly had "candidates with identified start dates," but Plaintiffs could only identify 18 positions for which there was new hire with a specific start date or a DAI Investigator "targeted" for the open position. *Id.* The remaining 42 were positions where potential hires either had not yet received final approval, where interviews were still ongoing, or where positions were merely posted. *Id.*
- 27. Regarding "detailing" of workers, the Department's November 8, 2017 update confirmed that most such assignments were either completed or were set to expire in November or December of 2017. *Id.* According to Plaintiffs' understanding, the ongoing "detailing" that the Department had arranged to extend beyond December, 2017 with more than 30 vacancies still unfilled was limited to one person detailed from Ottawa to accept investigations for the Joliet office, four Investigators from Cook detailed to the Joliet field office, and one supervisor detailed to serve as Office Administrator in Waukegan. *Id.*
- 28. On Thursday, November 9, 2017, Plaintiffs asked for clarification of the amount of time required for a newly hired Investigator to complete training, and whether the "start dates" for the new hires that the Department had reported were dates when the worker would be available to begin handling investigations. *See* Ex. 4 at ¶ 3 and Ex. T thereto. Plaintiffs have not received a response to that inquiry.

I. Failure of the Parties' Negotiations.

- 29. On Tuesday, November 14, 2017, the Department failed to honor its commitment at least to provide a *date* by which it would commit to negotiate an agreed implementation plan, for the Court's approval, to address excessive caseloads for Investigators. *See* Ex. 4 at ¶ 3 and Ex. U thereto. The next day, Plaintiffs informed the Department of their view that the negotiation process had failed. *Id.* The Department stated that it nevertheless intended to provide additional information to Plaintiffs on Friday, November 17, 2017. *See* Ex. 4 at ¶ 3 and Ex. V thereto. Plaintiffs agreed to consider any such additional information, but warned that unless the update confirmed the Department's willingness to negotiate an implementation plan for curative action that would be submitted to the Court for approval, Plaintiffs nevertheless would move for relief. *Id.*
- 30. The Department provided Plaintiffs will a further "update" regarding the status of its efforts in respect to Paragraph 26(a) on November 17, 2017. See Ex. 4 at ¶ 3 and Ex. W thereto. The update generally repeated the Department's prior descriptions of its attempts at curative action, and also repeated the Department's position that "a court ordered implementation plan is [un]necessary." Id.
- 31. In respect to hiring, the Department stated that as of November 16, 2017, there were "approximately" 66 vacant positions for Investigators. *Id.* That represents an *increase of six vacancies* since the November 8, 2017 hiring update. *See supra* at ¶ 26. The Department gave no explanation for that change. The Department further reported that it had "identified candidates with start dates" for 32 of its identified 66 position vacancies. *See* Ex. 4 at ¶ 3 and Ex. W thereto. The Department's update did not even *mention* further efforts to "detail" workers to locations where assignments continue to exceed the Paragraph 26(a) limits.

J. The Data Demonstrating Substantial Non-Compliance.

- 32. Plaintiffs have analyzed the 72-Hour Assignment version of the Department's year-to-date report of assignments through October 31, 2017. Even limiting consideration only to the timeframe from June 1, 2017 through October 31, 2017 (when DCFS was on notice regarding Plaintiffs' concerns regarding the Department's violations of Paragraph 26(a)), Plaintiffs' analysis demonstrates the following:
 - Between June 1 and October 31, 2017, as many as 1,950 investigation assignments have been made in violation of the Decree.
 - Between June 1 and October 31, 2017, no fewer than 300 Investigators have received at least one assignment in excess of the Decree's limits during that period, more than 200 of those have received three or more assignments in violation of the Decree, and more than 70 have received 10 or more assignments above the Paragraph 26(a) limits.
 - Since June 1, 2017, the Department has continued to assign investigations well in excess of the Paragraph 26(a) limits to interns.
 - The Department's assessment of which workers have a "risk indicator" for receiving assignments exceeding the Paragraph 26(a) limits as of October, 2017 is unsound because it employs fatally flawed "averaging." Many Investigators with a substantial number of assignments in violation of the Decree do not have a positive "risk factor" designation. For example:

Worker	Team	Risk Factor	# of Assignments over Decree Limits 6/1/17 to 10/31/17
MAL***	1B 19	N	8
FOR***	1B 22	N	9
PET***	1B 12	N	14
JON***	3A 96	N	10
GRO***	1B 47	N	12
HAL***	3A 32	N	13
PAR***	2A 55	N	16

33. In October 2017 alone, at least 170 Investigators were given assignments exceeding the Decree limits, and 40 of those Investigators were assigned 20 cases or more, well above the 15-assignment monthly maximum allowed under Paragraph 26(a). See Ex. 4 at ¶¶ 7-8 and Ex. W thereto.

WHEREFORE, for all of the foregoing reasons, Plaintiffs respectfully request that this Court (i) find that DCFS is in substantial non-compliance with Paragraph 26(a) of the Consent Decree and that Plaintiffs have satisfied the notification and negotiation requirements of Paragraph 68(d) of the Decree; and (ii) order the relief set forth at p5-6, *supra*.

Dated: December 7, 2017

By: /s/ Claire Stewart

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CERTIFICATE OF SERVICE

I, Claire Stewart, one of the attorneys for the Plaintiff class in the above-captioned litigation, hereby certify that on December 7, 2017, I electronically filed the foregoing document, **Plaintiffs' Motion to Enforce Decree** with the Clerk of the Court using the CM/ECF system, which will cause an electronic copy to be served on all counsel of record. In addition, I served copies of that document to be served on the following individuals, who are Court-appointed experts in this matter, via email as set forth below:

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Exhibit 1

Direct Service Workers' Recommendations for Child Welfare Financing and System Reform

January 2012



By Sean Hughes and Suzanne Lay

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 3 of 179 PageID #:3480

Direct Service Workers' Recommendations for Child Welfare Finanacing and System Reform

January 2012

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Introduction

Federal child welfare financing reform has been debated by policymakers and child welfare advocates around the country since the 1996 welfare reform legislation was enacted. People with creative policy ideas and extensive knowledge about how government services are funded have offered up a variety of proposals to use federal dollars to improve outcomes for children in the system and appropriate resources more efficiently. Participants in this debate can be found in the White House, federal agencies, Congressional offices and committees, state governments, think tanks, non-profits, trade associations, foundations, and more. However, one voice has largely been missing from that debate: the frontline workers who have the most direct contact with children and families in the child welfare system.

Frontline workers handle the daily responsibilities aimed at promoting children's safety, permanence, and well-being. They and their supervisors play a critical role in the process of determining whether an abuse or neglect report is substantiated, what services families that come into the system should receive, if a child should be removed from their home, where a child who has been removed from the home will be placed, when they will see their biological family and if they will be reunited with them, where they will attend school, and more. Their unique perspectives and rich expertise can and should help inform the ongoing debate about child welfare financing reform.

Accordingly, the Child Welfare League of America (CWLA)—uniquely positioned as an organization with members that provide direct services in all 50 states—conducted a series of webinars with groups of frontline workers and supervisors, along with a few executives, from its membership agencies over six months spanning November 2010 to May 2011. The webinars combined registration questions, group discussion, and in-session polling to learn these participants' perspective on child welfare financing reform. In total 142 people with direct, first-hand knowledge of the child welfare system contributed responses. Of those, 67 answered all registration and polling questions and participated in a discussion focus group.

Participants were questioned about their roles, familiarity with federal policy, obstacles they face in improving outcomes for children and families, and supports that might enable them to do their jobs more effectively. They also gave their perspective on the availability and effectiveness of resources and service approaches and shared their views on how they and the children and families they serve can have a stronger voice in improving the system.

The participants in CWLA's focus group survey provided an enlightening glimpse into their daily lives so that policymakers and advocates can understand what happens at the frontline level. This report summarizes their responses and analyzes the implications their answers have on con-

Summary of Recommendations

The single most frequently mentioned recommendation was to enhance family support services. Direct service workers see the lack of support for families as the most pressing need in the child welfare system. Family strengthening, training for parents, homemaker help, home visiting and supports to overcome dysfunction, crises, and emergencies facing families were among many family-focused suggestions made by the focus group and survey participants.

Additional funding for services and supports and particularly for prevention services was also mentioned frequently by the participants. Many participants mentioned the lack of resources focused on keeping families intact as an effective prevention strategy. Many recommended more support and attention to strategies focused on the family.

Support for the child welfare workforce was also recommended highly. Increased salary and benefits, and more training both for front line workers and supervisors were mentioned frequently. More emphasis on reducing caseloads was also highly recommended.

"CWLA is committed to safety, perma-

nence and well being. Federal funding for

child welfare is targeted mostly on safety

and out-of-home care. Congress should

enact urgently needed finance reform to

better align resources with an array of

services and programs to meet the

unique needs of children and families."

- Christine James-Brown, CEO, CWLA

tinuing efforts to craft comprehensive and effective federal child welfare financing reform. An update on the latest financing reform developments and CWLA's policy positions will first be summarized in order to provide the proper context.

Recent Financing Reform **Developments**

Over the past few years, momentum toward comprehensive child welfare financing reform has been building. Legislation has just passed Congress to reinstate the authority of the U.S. Department of Health and Human Services (HHS) to allow states to implement new innovative demonstration projects through a five-year waiver of Title IV-E. While IV-E waiver authority falls short of CWLA's idea of comprehensive reform, innovative and effective practices can be developed through the research, development, testing, and evaluation processes allowable

under waiver authority. Perhaps most importantly, House supporters of the waiver bill have publicly committed to continuing to fight for more far-reaching financing reform.

In addition, a Senate Congressional Caucus on Foster Youth has been formed and has conducted

a series of forums to examine shortcomings in the child welfare system. One session in particular focused specifically on financing reform and Senate staff heard a variety of viewpoints on what the next steps should be. The work of the Caucus culminated last year in a "Call to Action" paper supporting the idea of pursuing financing reform and listing some generally agreed upon principles to guide reform. The Caucus' work also continues with additional forums planned moving forward.

In response to Congressional action, several financing reform proposals were developed last year by various experts and advocacy organizations, including the American Public Human Services Association (APHSA), Casey Family Programs (CFP), the American Bar Association (ABA), and

Chapin Hall at the University of Chicago. In addition, CWLA and a number of other advocacy groups have been working on developing a consensus proposal through the Partnership to Protect Children and Strengthen Families.

CWLA's Position on Major **Financing Reform Provisions**

While each of the financing reform proposals mentioned above is unique in its own way, there are several recurring themes and provisions in them that will presumably shape both the final Partnership proposal as well as financing reform legislation that may be pursued in Congress. Below is a list of these recurring provisions and CWLA's position on them.

Maintaining the IV-E Entitlement

Since IV-E is an entitlement, it is not subjected to the annual appropriations process and it provides guaranteed, mandatory fund-

> ing to states based on the number of eligible children in foster care. The amount of money sent to the states is directly tied to the number of kids in foster care eligible for assistance. Its status as an entitlement ensures a guaranteed level of financial support for each eligible child, which would otherwise be in

jeopardy to the political situation in Congress and the appropriations process.

Title IV-E provides support for out of home placement, including foster care, adoption, and kinship/guardianship. There is real concern that children placed in out of home care are not attaining the outcomes we would like to see, and CWLA continues to support efforts to reduce the number of children placed in care through preventative services, post-permanency services, and alternative arrangements like kinship care. However it is critical that those children who are placed in foster care receive maximum support and care. CWLA believes that this can best be achieved by continuing a guaranteed funding stream, via the

CWLA 2

current IV-E open-ended entitlement, acknowledging that the federal responsibility for this population should not be based on political support but rather directly based on the number of children in care, providing resources for each eligible child.

De-linking IV-E Eligibility from Income Standards

Because IV-E eligibility is linked to outdated income standards, less than half of children in foster care are currently supported by IV-E. Furthermore, because the income restrictions that IV-E is linked to are frozen in place and not adjusted for inflation, the rate of foster children covered by IV-E, which is known as the penetration rate, saw a dramatic decline since 1998 (see Appendix II). As the number of eligible children decreases, states face increasing pressure and decreasing federal IV-E reimbursements to maintain the support for these vulnerable children and families. This implies that the federal government is only half-concerned in providing care for foster children, which should not be the case.

For a full federal partnership in protecting all children who have been removed from their homes, CWLA believes that the IV-E entitlement should be not only maintained but strengthened by extending its guarantee to all children in out-of-home care, regardless of the income levels of their parents or caregivers. This can be done immediately or if necessary it can be phased in gradually to reduce the cost.

• Reinvestment and Maintenance of Effort

Many of the proposals would allow states to project their foster care costs over a given period of time based on current practices and caseloads. If they were then able to reduce foster care placements over this time they would be allowed to reinvest the amount saved into their Title IV-B programs, which support children who have come to the attention of the system but who have not yet been removed from their homes. This would create an incentive for states to reduce the number of children they place in foster care without forgoing any funding. It would also provide important resources to supplement many states' underfunded interventions and innovative services, which would further

reduce the number of children in foster care.

Others have proposed opening up Title IV-E to cover a range of services, from prevention to post-permanency. Under these proposals, any child who was the subject of an abuse or neglect report would be eligible for a full range of approved services that have been determined to be effective in improving outcomes for children and families. States would be required to continue to match Title IV-E funding for these services.

CWLA supports both proposals that would open up IV-E eligibility to other child welfare services and those that would redirect and reinvest IV-E savings incurred by reducing foster care placements into IV-B programs. In both cases, financial limitations would most likely restrict funding to improving the outcomes for families who have already come to the attention of the system via an abuse or neglect report. With or without reform, CWLA continues to support other anti-poverty and social service programs that target other at-risk families who have not yet come into the child welfare system.

Rates of IV-E Reimbursement for the Continuum of Services

Some have suggested establishing new levels of reimbursemenyt for different methods of care, in effect creating a tiered system of reimbursement rates by providing higher rates of reimbursement for preferred placements and lower or decreasing rates of reimbursement for less desirable placements. Others have proposed placing time limits on reimbursements for certain types of care, including foster care, as another means to discourage certain placements. CWLA supports maintaining funding for the full continuum of services and does not endorse structuring or time-limiting reimbursement rates in a way that might hamper caseworkers' ability to meet the unique treatment and daily care needs of the children and families served.

• Workforce Support, Administration, and Reporting Issues

It is important to preserve the separate funding streams for training and administration under Title IV-E to ensure that they are not shortchanged. Some of the proposals would merge all Title IV-E programs into one account, making it difficult to ensure that things like workforce training and staff development, which are critical to ensuring that the foster care caseloads are being properly managed, are adequately funded. CWLA believes that the separate, dedicated funding streams for training and administration should be maintained.

Accountability is a critical consideration to ensure that any refinancing plan accomplishes its intended purpose of better ensuring the safety, permanence, and well-being for every child. Financing reform will give greater discretion to states to determine how to use resources, and they must be held accountable to these goals.

Cost Issues and Offsets

While none of the various financing reform plans have been officially scored by the Congressional Budget Office for their cost, it is evident that they represent a great range of cost. For example, allowing states to redirect Title IV-E savings to Title IV-B programs would undoubtedly cost less than opening Title IV-E up to the full range of services. The likely political reality is that any financing reform proposal will have to minimize cost to the federal government in order be given serious consideration by the current Congress. Some have suggested achieving cost savings through reduced reimbursement rates for certain forms of care, others suggest eliminating other programs like CAPTA that might become duplicative if the uses of IV-E were to be expanded, and others have suggested capping funding levels or block grants.

As noted above, CWLA supports maintaining funding for the full continuum of services and does not endorse using reimbursement rates in a way that might hamper caseworkers' ability to serve the unique needs of children and families. Moreover, CWLA believes that the current child welfare system is already greatly under-resourced. As the financing reform discussion moves forward, CWLA will continue to weigh any proposed cost-cutting ideas against our principles and standards, and will only endorse compatible proposals.

Focus Group Survey: Responses and Implications Participants

Over the course of six months, CWLA hosted 14 webinar discussions with small groups of workers in the child welfare system. A total of 67 individuals participated in all aspects of this process. Each registered for one of the scheduled webinars by providing basic demographic information and responding to nine multiple choice questions. The average webinar discussion took one hour and involved a series of eight multiple choice questions, opportunity for elaboration on each question, and a concluding section where respondents provided additional open-ended feedback to a series of five broader questions. CWLA is grateful to those who generously devoted their time and shared their knowledge with us through the surveys.

97% of participants work with children and families. 73% have worked in child welfare longer than 5 years.

Participants had a mix of job titles distinguishing them as frontline workers (73%), supervisors (17%) and administrators (10%); however, when asked about their duties, 97% reported direct contact with children and families. Public and private agency workers were fairly evenly represented, with 48% coming from the public sector, 45% from the private sector, and 7% from agencies that have various public and private features. Geographically, those surveyed were from both small and large jurisdictions across the country, although the mid-atlantic and southern regions were more heavily represented than the rest of the country. Almost half of participants predominantly provide foster care services, just over a third provide services in child protection, with the

The high stress, low compensation nature of the field results in high turnover between 23 and 85% yearly.² The average child welfare worker lasts two years on the job.³ remaining fifth split between working in adoption and specialized services.

The vast majority of those questioned are veterans in the child welfare workforce. 73% answered that they have at least five years of experience and 40% have been in the field for a decade or more. These are professionals who are resilient and are overcoming the challenges that lead to the high turnover in the field. Only 15% of respondents reported being in the field for less than 3 years. Experience was predictably greatest with supervisors and administrators, but even among workers with predominantly frontline duties, 63% of respondents indicated that they have worked in child welfare for at least five years. The vast experience possessed by those surveyed at all levels of the field, and the wisdom and knowledge they have gained along the way, is beneficial for those interested in reforming the financing of child welfare.

When queried about their level of familiarity with current federal child welfare legislation and ongoing federal child welfare activity, 78% of frontline workers, 55% of supervisors, and 71% of administrators self-identified as either very familiar or somewhat familiar. Workers in public agencies were more likely to be familiar with federal policy, but the majority of both sectors are more familiar than not. This confirms an expected selection bias, considering workers responding to a policy survey are more likely to be interested in and following federal child welfare policy. Nonetheless, most participants were responding to the questions with some understanding of the federal partnership in responding to child maltreatment. Nobody reported that they were not at all familiar with federal policy.

Participants are experienced, work directly with children and families, and are knowledgeable about federal policy. They also work across the continuum of services as 36% are in child protective services, 43% are in foster care, 9% are in adoption and 12% are in specialized services. Their personal familiarity within the system and the lessons they have derived over the course of their careers were the focus of this project. CWLA believes these often overlooked voices can and should significantly contribute to the financing reform policy debate, as this focus group survey demonstrates.

Responses

Workforce

Because they work to improve difficult human experiences, it is vital that frontline workers be

CWLA Caseload Standards	
Worker Type	Caseload Standard
Workers making initial CPS assessments	No more than 12 active reports per month
Workers providing ongoing CPS support	No more than 17 active families, assuming the rate of new families assigned is no more than one for every six open families
Working both making initial CPS assessments and providing ongoing CPS support	No more than 10 active ongoing families and no more than 4 active initial assessments. ⁵
Worker providing Intensive Family-Centered Services	2-6 families
Worker providing Family-Centered Casework	No more than 12 families ⁶
Worker counseling with birth families, preparing and assessing adoptive applicants for infant placements and supporting these families following placement	20-25 families
Worker preparing children for adoption who are older or who have special needs	10-12 children
Worker assessing and preparing adoptive applicants for the placement of children who are older or have special needs and providing support to these families following placement	12-15 families
Worker assessing and preparing adoptive applicants for inter-county adoption	30-35 families ⁷
Family foster care social worker	12-15 children, depending on the level of services required to meet the assessed needs of each child ⁸

supported. One worker put it this way, "child welfare is a very meaningful job, but challenging and scary." Another explained, "We are dealing with families with real issues. Overloading [us] is not benefitting the families or the children." When polled as a whole about which self-care resource is the most promising for supporting frontline workers, they overwhelmingly selected meaningful supervision. In fact, workers on both ends of providing and receiving supervision pointed to this as the most promising work support. One respondent elaborated that support for the workforce could best be provided by "having knowledgeable supervisors to guide workers to do their job efficiently and with less negative impact on the families."

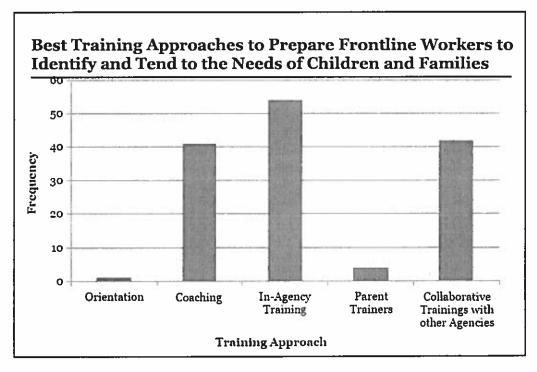
For the same question about how workers can be best supported, each of the remaining options was picked by six to eleven percent of participants—peer support, secondary trauma/burnout prevention, and employee assistance. In pointing to the need for support in general, one worker called for "understand[ing] that working with families is one of the most difficult and important jobs in this country [and] recogni[tion of] of our professionalism and education." Another worker described child welfare work as a "commitment," while another agreed that workers experience a "large burden" but are "underappreciated." Indeed, frontline workers often make incredibly

difficult decisions that can have tremendous consequences. This makes proper training essential.

Another question investigated the best training approach to prepare workers to identify and tend to the needs of children and families. As one participant explained, training enables workers "to assess families and their needs and respond appropriately." There was general agreement regarding the impor-

tance of training, but some workers pointed to a deficiency in their training experience. One described that "training is rushed" and another requested "more training with regard to policy and procedure" and "more ongoing training or refresher courses as well in order to ensure that we can adequately serve our families." With respect to the particular form of training, 43% of participants picked in-agency training as the best approach, 30% picked coaching, 25% picked collaborative trainings with other agencies, and 2% picked parent trainers or orientation. As is evident, forms of training that are ongoing were selected over orientation training. Without discounting the importance of proper orientation, the workers on our surveys are pointing to the importance of continuous active learning in their immediate agency, from their peers and with other agencies with whom they interact.

With high turnover rates, keeping workers motivated is integral to retaining a skilled, knowledgeable, and effective workforce. One worker points out, "Families become frustrated with turnover as well." The average caseworker makes just \$35,000⁴ per year, and thus predictably a plurality of respondents (34%) cited increased salary and benefits as the most effective way to motivate frontline workers. "Those of us in [in the field] need to be compensated for it better," sum-



marized one worker. Another says, "We are rarely rewarded for what we do and it's always about what we don't do, which does not help." A significant number also believe flexible scheduling and adequate leave time (27%) and collaborative teams (26%) would be a good motivator. Resource staff (13%) could also prove helpful, according to others.

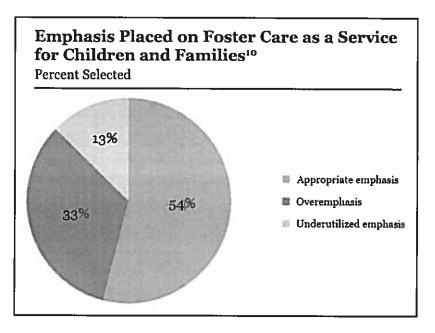
Over the course of the webinars, many workers brought up high caseloads as a major workforce problem. One frontline worker suggested when caseworkers have "high caseloads, it's hard to deliver the quality of service we want." A different survey participant pointed out that smaller case-

loads not only allows workers to devote more time to helping a family stabilize, but also to "stay on the path of stabilization." Another simply declared, "Overloading the workers is not benefiting the families or the children." Elaborating on the problem, a worker explained, "Caseload expectations are not realistic at all. It's impossible for the workers to go to court, implement services, complete their monthly visits, [address] providers not giving appropriate services, as well as all the documentation that needs to be put in the system." On top of understanding how many demands a caseworker is under. another worker adds that the "life and death decision[s that we are making] cannot be made when you are overloaded with other cases and issues."

Intervention

Even though foster care caseloads have been declining across the nation for some time, many believe that foster care continues to be utilized

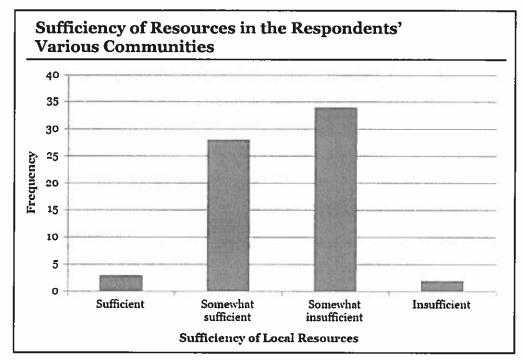
"In NJ, the result of our lawsuit was the modified settlement agreement which limits our caseloads: 15 families per permanency workers and 12 per intake/ investigation worker. I feel this was one of the best reforms I've seen." — Focus Group Participant



more often than it is necessary. However, our survey paints a more complex picture. With the expressed understanding that service provision varies from system to system, respondents were asked about of the level of emphasis currently placed on foster care as a service for children and families in their community. 54% responded that there is an appropriate emphasis, 33% believe it is overemphasized, and 13% believe it is underemphasized.

The use of foster care can be a contentious issue. One respondent described foster care as a "band aid" that "doesn't heal the community: it breaks it apart." Some worried that foster care placements were sometimes a resource decision. with federal Title IV-E funds and Medicaid being available for children placed in foster care. Still, two-thirds of these workers do not believe that foster care is used too frequently in practice, and on this issue there was agreement from both the public and private sectors. A worker from a large suburb believed the use of foster care there is appropriate, noting that they "only pull the kid out if the family cannot meet their needs and foster care is the last option." Another noted that their agency only used foster care "when we need to" in order to ensure child safety and well-being.

Even so, the workers generally agreed on the need for greater investment in preventative services to further reduce placements. "If you had more resources at the front end, you could stop a



lot of foster care situations. More money is put into care for the children, instead of the families first," elaborated one participant. Several similarly concluded that resources are widely available for kids placed in foster care while resources to keep families intact are often lacking.

When asked to consider a scenario in which sufficient federal funds for child welfare services are available, respondents were split between adding funding to prevention (41%) and throughout the child welfare system (44%) when forced to choose one service. The remaining choices, permanency services, supportive services for parents, or post-permanency services, were each selected by 3-6% of respondents. A similar breakdown was consistent from respondents at both public and private agencies, up and down the workforce, and across the continuum of services. "Funding is a continuous problem and the biggest one we have," summarized one worker succinctly, while a second believed that "funding would make a difference across the board." Somebody else stated that if prevention services were more heavily invested in, "it could reduce the overall cost of child welfare." A former worker in their state's department of social services agreed, recalling "children came into care for reasons that could have been resolved with more funding for preventive services." A

different respondent wished that the system was more "proactive" than "reactive."

"While funding would make a difference across the board, the facts still point to prevention as a more efficient solution than fixing issues that already are present."

Taking this perspective down to the local level, when asked about the sufficiency of resources in their communities, respondents do not believe the sys-

tem is broken; however, neither do they believe it is fully sufficient. Half responded that the resources available are somewhat insufficient, while 42% think they are somewhat sufficient. Some of those decrying a lack of resources specified that clothing and housing, in-school services and extracurricular activities, and services for older youth are specifically lacking. Another noted that their community was trying to address agency collaboration issues but was attempting to do so without any dedicated funding.

State and local budget cuts have contributed to reduced services and amplified the resource insufficiency problem. One worker pointed out that federal matching funds are sometimes also lost when state cuts go into effect, "In California, we have suffered double or triple cuts—federal budget cuts, state budget cuts, and additional loss of federal funds due to state cuts." A different person has noticed that budget cuts are causing the system to break down and resulting in kids re-entering the system more frequently. "I would want Congress to

"There needs to be a mechanism to poll the children and families to say how they feel about the services received. We should seek to treat every child as if they were are own children in every facet of their lives." – Focus Group Participant know that cutting funding will not help out children and families. Before making any recommendations regarding funding, talk to those in the community that are experts," they advised.

Service Needs

When asked about barriers to meeting the needs of children and their families, the most frequently identified was limited resources and services that are family-focused and strength-based, which was checked by almost half of respondents (48%). Limited time for direct contact with children and families was checked by 24%, failure in service system collaboration by 16%, limited training and skill level of the workforce by 9%, and limited ability to measure success by 3%. Here, the barriers most selected are at the point of contact with clients.

Several of the remaining multiple choice questions sought to glean the worker's perspectives on the most effective and efficient services¹¹ in various categories. These services and resources are examples of what can be incentivized to eliminate the major barrier just cited. In each category, the workers were forced to choose one service and elaborate on why that was chosen and why the others were not selected. This elicited some insight into services that should be available as a tool to workers.

In comparing community supports for the parent/guardian role, participants most often pointed to parent education and training as the

Community Supports for the Parent/Guardian Role		
Support	Frequency	Percent
Home Visiting	8	12.7
Early Learning, Child Care & Head Start	6	9.5
Parent Support Group and Peer Assistance	16	25.4
Homemaker Help, Respite Care and Crisis Nurseries	10	15.9
Parent Education and Training	23	36.5

most effective and efficient (37%). Many of the workers followed up by explaining the importance of teaching parents about their children's development and helping them build skills to gain insight into their parenting practices. One worker gave an example that parents often do not know what to do with safety plans, but parent education helps them to practice a goal of "not hitting and screaming at their child." The class gives them viable alternatives and the goal becomes something they can conceive and actively work on. There was some concern that some models are not individualized enough and that lecture style classes are not effective. Another participant worried that her parents do not feel like they get anything out of their parenting class because they feel judged. Bringing up a similar point, communitybased parenting education was recommended by another participant.

"Families are experts on themselves and must be empowered." – Focus Group Participant

Developing good parent skills are essential, and other participants highlighted additional approaches. One participant has noticed that some families are stuck in the child welfare cycle as "many parents are 3rd and 4th generation in the system and need modeling." Another worker has had the "most success with parents who feel confident." Peer support, homemaker help, respite, and therapeutic education were variously cited by other participants. Services covered under federal programs were also mentioned as playing an important role. "Home visiting is important and helps parents utilize other services, targeting efficiency," said one, while someone else pointed to Early Head Start's successes.

For strength-based services, parent job education, training, and skill development (34%) was most often selected as the most effective and efficient. Throughout the discussion, multiple people cited the stress that financial struggles have on families and brought up parent job training as helpful. Many pointed to their client's struggles with poverty and one worker pointed out the toll that lacking resources takes on the family dynamic, particularly the parent role.

Service	Frequency	Percent
Family Group Decision Making	17	27.4
Parent Job Education, Training and Skill Development	21	33.9
Family Resource Centers	14	22.6
Parent Leadership Roles	2	3.2
Differential Response	8	12.9

Family group decision making (FGDM) (27%) and family resource centers (23%) were also picked often. Workers found the family driven aspect of FGDM most helpful. One explains, "it provides the family with a forum to voice what they feel that they need to do to succeed, rather than being told what to do." Meanwhile, family resource centers were cited as another way to address the concrete service needs of families in poverty. Differential response was selected by 13%, but often discussed. Not everyone sees it being effectively implemented, but one participant who believes it works explained, "Differential response allows the family to address the issues before being passed out to a plethora of agencies which will include more than one person coming into the lives of the families, which can be overwhelming."

In terms of permanency services, the respondents most often selected family strengthening as having the most potential. "It is critical to invest

Service	Frequency	Percent
Family Strengthening	22	37.9
Kinship Navigator and	14	24.1
Intensive Family Finding		
Specialized Adoption	1	1.7
Recruitment and Photo Web		
Listing/Matching		
Mentoring	3	5.2
Post Adoption Support Services	18	31

in family strengthening because most children end up returning home, even those who have been in foster care for years," as one survey respondent has noticed. Someone else remarked, "I always have kids reconnecting with their families.....When you don't address that connection, it's broken." If you strengthen the family, you may not need other options listed," stated one respondent, concisely encapsulating the importance of reunification services. "If the family can be strengthened there is a better likelihood of continued success," agreed another.

Other successful permanency services identified were post adoption support services (31%) and kinship navigator and intensive family finding (24%). Several comments were recorded on the importance of post-permanency services. One participant went as far as to say that all adoptive parents need support because of the great likelihood that adoptive children have challenges resulting from the circumstances of their needing new caretakers. Another respondent agreed that, "Intensive Family Finding brings a connection of family which can mean the world to many," observed that participant. Many registered their support for locating and supporting relatives, and one worried that "reasonable efforts" are sometimes not always made. Kinship was cited frequently as an important way to provide consistency to children and a better alternative to foster care in many cases Several who elaborated on their responses also said that mentoring, while not always readily available, should be expanded because it "can help children understand the roles and help them understand what their parents are going through."

Mental Health Services		
Service	Frequency	Percent
Mental health services for children living at home	40	69
Mental health services for children in foster or kinship care	11	19
Foster family-based treatment	4	6.9
Community-based residential	0	0

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With respect to children with mental health needs, the survey inquired which services are most needed in the communities of those responding. The need to provide mental health services for children living at home was by far the most popular choice, receiving 69% of the vote. There seemed to be a clear agreement that the mental health needs of children who have come to the attention of the child welfare system, but who continue to live at home, are not being met. Here again there was an emphasis on strengthening prevention services. Family members need to be "taught more information on health services" and children's behavior problems, thought a participant.

Mental health services for children in foster or kinship care was chosen by 19%. "Mental health services are not always effective or timely to prevent deterioration of children in foster care," observed someone. Another went on to explain, "We do not have a lot of foster homes that understand the needs of children that have mental health needs. They do not know how to work with the children with these problems and therefore request immediate removal of the children and do not want to work towards helping the children deal with the issues."

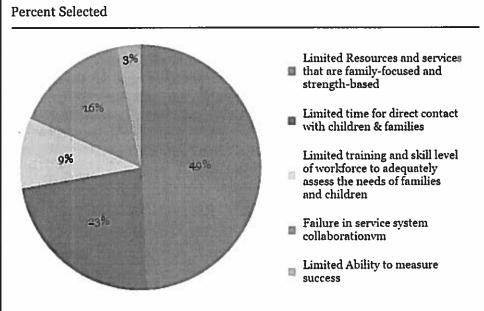
Foster family-based treatment received 7%,

and community-based residential received 5%. Treatment should "involve family and community" noted multiple respondents, although one acknowledged that getting family and community members to participate can be challenging. "A lot of mental health issues are treated one on one as opposed to a more family-focused treatment," declared one disappointed worker. Finally, while one respondent from New York lauded the "great residential services" in their state,

another worried that their state was "backing off of residential care, and that is not the answer" while a third opined, "they do not have enough" community-based or traditional residential services in their community.

Several more concrete service needs were mentioned throughout the webinar, including housing, substance abuse services, navigating public assistance systems, parent's inability to access required services that are only held during their working hours, access to public transportation, services for older youth, services for undocumented immigrants and systems collaboration. As can be imagined, many workers struggled to pick just one service in each of these categories. Many workers explained that unique clients need different services and supports depending on their history, current circumstances, and the place they are in the continuum. One worker explained, "To be truly strengthbased, families should be able to choose from lots of services that meet their skills and strengths." Several respondents also pointed to the need to raise the voice of the children and families touched by the system.

Barriers to Meeting the Needs of Children and their Families



Conclusion and Reccomendations

What Does This Mean for Financing Reform?

As expected when surveying a diverse group of workers from multiple regions, with different experience levels, serving variable roles within a complicated system, there was not always complete agreement on each question. In many cases the collective voices of these workers support what is being currently advanced by legislators and the advocacy community at the federal level. Yet in other instances it challenges those positions. With that said, a number of recurring themes were revealed throughout the survey. This ground level perspective on what works, what doesn't work, and what is lacking within the child welfare system will help elected officials and child welfare advocates get a fuller picture of where the system needs to be reformed.

The Need for More Prevention Funding

To begin with, the limits of the current federal child welfare financing structure were broadly recognized and frequently raised by survey participants. Because of the way the system is currently constructed, the federal government spends heavily on placements that provide the least desirable outcomes for children, like foster care, while shortchanging services that address the safety and well-being of children while keeping them with their families. More specifically, in fiscal year 2011, the federal government budgeted about \$4 billion for Title IV-E of the Social Security Act. which reimburses states and tribes for out-ofhome care. By comparison Title IV-B programs and programs authorized under the Child Abuse Prevention and Treatment Act (CAPTA), were funded at about \$800 million combined.

Not only are there large discrepancies in funding between Titles IV-E and IV-B, but there are also major differences in how much flexibility the funds include. Title IV-E payments are highly restrictive to reimbursing the daily care and supervision of children in out-of-home care and

limited to only those eligible based on an outdated income standard. Only recently have they even been allowed to be used for kinship care or directly accessed by tribes. On the other hand, Title IV-B funds are considerably more flexible. States can use Title IV-B funds for a range of services as long as they are consistent with the broad goals of the program. Funds can be used for abuse and neglect prevention, child protection services, post-adoption support, services for at-risk children who remain with their families, efforts to improve the safety, permanence, and well-being of children in foster care, supporting the child welfare workforce, and a number of other interventions to keep children safe and families intact.

Many of the workers surveyed through this project mentioned the importance of these prevention services and their potential to address problems within families early while reducing the need for more drastic measures like removal of the child. CWLA agrees with the concept that increasing investments in front-end preventive services can reduce the need for more expensive, less ideal placements later. Dedicating more resources to prevention would create a sensible and more comprehensive system. Unfortunately, as outlined above, the federal government currently provides many times more funding for kids in the child welfare system that have been removed from their homes than those who are still living at home. This must change to create a balance that reflects the blend of services that children need to stay safe.

Maintaining Support for the Full Continuum of Services

As highlighted above, front-end services are all too scarcely funded by the federal government while foster care for children who are IV-E eligible is reimbursable as a federal entitlement. This dichotomy of federal resources creates a financial incentive for children who come to the attention of the child welfare system to be placed in foster care. It also means that as states and tribes make progress in reducing their foster care caseloads over time, they are receiving less federal resources each year.

Some believe that these resource issues influence placement decisions. They worry that financial

"We need to focus on being fearless and

ethical in advocating for our children. Some-

times we get lost in the political process

and you see direct impact in service. If we

start making fearless decisions, they're

clinically more sound than fearful decisions.

Fearless is always putting the child's rights

ahead of our own personal interests or political

interests, or even funding issues."

- Focus Group Participant

calculations are leading to more children being placed in foster care than necessary. While this is almost impossible to verify, CWLA recognizes the perversity of the current federal child welfare financing structure and believes that sufficient resources should be devoted to at-risk children and families before removal becomes necessary. The lack of family supportive prevention funding may contribute to the use of placement services when children cannot otherwise be kept safely at home.

It should be reiterated here that 2/3 of the workers surveyed rejected the idea that foster care is overutilized. In fact, 13% even think it is underutilized. These workers have dealt personally with the system, most for many years, and they have first-hand experience with placement deci-

sions. It is also important to point out that reimbursement rates vary from state to state, but even in the states with high levels of reimbursement there is still a significant cost to the state for placing a child in foster care.

Still, in order to address the foster care incentive issue some have advocated placing limits on or adjusting IV-E reimbursement rates. Proposals to place time limits on reimbursements and to create variable tiers of reimbursement levels depending on the specific type of placements have been floated. As noted before, CWLA does not endorse this approach. There are other ways to address the incentive issue and maintaining support for the full continuum of child welfare services is critical. Every child that comes to the attention of the child welfare system has unique circumstances and needs. Whether they will best be served by remaining at home or being placed with relatives, a foster family, or in a residential facility is a determination that should be made by a professional caseworker in consultation with the family. The full range of these options should be available to children and should not be influenced by levels of reimbursement or other financial incentives.

Why Income Restrictions Should be Removed

Income restrictions on IV-E eligibility are also a bureaucratic challenge and time sink for an already overburdened workforce, as we learned from our survey respondents. This revealed itself to be especially true for public sector child welfare agencies. Every hour that a frontline worker has to spend researching income data and filling out

> corresponding paperwork is an hour that they are not able to families within their caseloads. If the Aid to

spend working with the Families with Dependent Children (AFDC) link is removed and all children in out-of-home care are automatically eligible for federal support, these caseworkers

would no longer face this issue.

As previously mentioned, eligibility for IV-E reimbursements is tied to an outdated measurement of income. Specifically, in order to be eligible for IV-E a child's parents would have to have an income low enough to qualify for the defunct AFDC program, commonly known as welfare, back in 1996. The percentage of children eligible for IV-E is known as the penetration rate. These income standards have not been adjusted for inflation in 15 years, so fewer children in out-ofhome care are eligible for IV-E than when the standard was locked in place in 1996. In numerical terms, as of September 31, 2010 there are 408,42512 children in foster care. Yet because of these outdated income standards, only 44% are receiving federal support.13

CWLA believes the federal government has an interest in and responsibility for all children who have been removed from their homes. Recently a similar restriction for adoption assistance eligibility was phased out via federal legislation. IV-E eligibility should be de-linked from AFDC likewise.

Not only is the link to AFDC a moral shortcoming, but it is placing further financial pressures on states as they are increasingly becoming the sole

supporter of children in out-of-home care. States that are already not receiving adequate federal support for most child welfare services like prevention are finding it progressively more difficult to fund such services because they have to shoulder more and more of the cost of out-of-home care.

Reinforcing and Developing the Workforce

The workers that participated in this project, and their colleagues across the country that they are representing, are the linchpin of an effective child welfare system that is responsive to the needs of children and families. Unfortunately, the child welfare workforce is hampered by turnover while individual employees face unacceptably high levels of stress, discouragement, and burnout. They feel frequently unrecognized and unappreciated and sometimes vilified. They worry that they are overburdened with bureaucratic requirements like paperwork that keep them from serving their families. Many workers do not believe they are properly trained or supported. We must find ways to simplify the process. Paperwork and procedural requirements must be eased so workers can focus more on providing services.

With respect to training, finance reform should provide more opportunities for the workforce to be trained not just initially but through continual professional development. Training funds should be flexible and training should be made available in a number of forms so that workers can find the types of training opportunities that best suit them. The separate, dedicated funding stream for training and administration under IV-E should be preserved if and when IV-E is reformed to include other services besides out-of-home care. While it

"It seems that no one asks frontline workers for our opinions and/or concerns about the child welfare system. We are working with children and families in an effort to improve situations. We do positive work, trying to make sure the children and families receive the services needed. It's extremely difficult without needed resources."

- Focus Group Participant

is important that prevention and other services be sufficiently funded, this should not come at the expense of training funding which ensures that all of the other programs and services can be carried out effectively.

While acknowledging the challenges inherent in their jobs, survey respondents resoundingly showed their passion for their jobs and the people they work with. They want to make a difference and they want the federal government to join them in the cause by providing them with the resources they need to improve the lives of children and families in the child welfare system. One respondent may have summed it up best, "To Congress- assisting families to be the strongest building block is the most important thing that they can spend money on for our country's success."

In order to achieve the best outcomes for the children and families served by the system, its workers need to be better engaged, trained, supported, and compensated. Their voices as reflected in this survey should be heard, acknowledged, and welcomed into the finance reform debate.

Appendix I

Survey terms & definitions

Community-Based Residential – Community Based Residential programs represent community based group homes, therapeutic group homes, and Small Group Homes or Alternative Living Units (ALU's). The facilities covered under the Community Based Residential umbrella are psychiatric treatment & residential treatment facilities; therapeutic, campus-based, and community-based group homes; small group homes and ALU's, and Shelters.14

Differential response – An approach that allows agencies and practitioners to differentiate their responses to reports of abuse or neglect. It allows practitioners to utilize multiple pathways when responding to such reports. The type, severity, as well as the parent's cooperation in addressing safety concerns are all factors which can influence differential response.¹⁵

Family-Finding – Family-Finding is a form of search technology used to identify biological

relatives or other important adult connections for children in the child welfare system. When relatives are identified the goal is to establish relationships, build upon those relationships, and strive to reach permanent family connections for children.¹⁶

An effective family-finding program should include: Information Gathering, Documentation, Search, Identification, Contact, Assessment, Engagement, and Permanent Family Placements and/or Relationships.¹⁷

Family-Focused – The *Family-Focused* principle implies working with the family unit to strengthen its capacity and ensure the best possible outcomes for children. It focuses on family empowerment, family strengths, and community strengths to prevent abuse and neglect while providing children and families with a safe and stable environment.18 Family Group Decision Making - Family Group Decision Making (FGDM) recognizes the importance of involving family groups in decision making about children who need protection or care. It can be initiated by child welfare agencies whenever a critical decision about a child is required. FGDM brings together a child's wider family group, who in partnership with child welfare professionals, lead decision-making about how to best care for and protect the children involved.19

Family Resource Centers – Family resource centers provide family support services by creating a central location for health, mental health, educational, and recreational services. Designed to control service duplication, Family Resource Centers promote community connections that empower families and enhance the lives of young children. These centers provide core services such as medical care, counseling, parenting classes, literacy classes, referrals for childcare & specialty medical services, and direct contact with early childhood and child development programs.20 Family Strengthening – The family strengthening approach is a framework for serving children and families. Family Strengthening recognizes that the family is the most fundamental factor influencing the lives and outcomes of children; and families are strongest when they are supported by safe and thriving environments.21 **Home Visiting** – Home visitation programs refer to a number of different model programs

that provide in-home visits to targeted, vulnerable, or new families. The programs can be either stand-alone or be part of a center based program.²²

Kinship Navigator – Kinship Navigator programs assist caregivers with navigating child-family programs and services. The purpose of Kinship Navigator programs is to help the diverse families learn about and obtain assistance to meet the needs of the children they are raising, and themselves.²³

Parent Education and Training – Parent education programs focus on decreasing parenting practices and behaviors associated with child abuse and neglect. It provides comprehensive information for the expansion of knowledge, understanding, and encouragement of positive attitudes relevant to children, parents, and communities.²⁴

Post Adoption Support Services – Post adoption services provide support to families and children who have recently completed the adoption process. The services may include counseling, respite care, emergency assistance, crisis intervention, family therapy, social skills training, child and family advocacy, and more. Strength-Based – The Strengths Based Approach refers to policies, practice methods, and strategies that identify and draw upon the strengths of children, families, and communities. This approach acknowledges each child and family's unique set of strengths and challenges. It engages the family as a partner unit in developing and implementing the service plan. 6

Appendix II²⁷

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	559,000	305,194	55%	192,251
1999	562,712	302,499	54%	260,213
2000	547,415	287,847	55%	260,168
2001	540,305	264,676	49%	275,629
2002	514,400	256,566	50%	257,834
2003	503,006	243,391	48%	259,615
2004	499,790	238,359	48%	261,431
2005	504,109	236,597	47%	267,512
2006	501,785	211,483	42%	273,671
2007	488,246	211,216	43%	277,030
2008	456,606	197,214	43%	259,392
2009	421,490	186,306	44%	235,184
2010	408,425	181,078	44%	227,347

Alab	ama			
	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	5,198	1,230	24%	3,968
1999	5,511	1,305	24%	4,206
2000	5,621	1,441	26%	4,180
2001	5,859	1,647	29%	4,212
2002	5,883	1,777	31%	4,106
2003	6,079	1,932	32%	4,147
2004	5,934	1,574	27%	4,360
2005	6,913	1,726	25%	5,187
2006	7,157	1,891	26%	5,266
2007	7,262	2,043	28%	5,219
2008	6941	2,254	32%	4,687
2009	6,894	1,891	27%	5,003
2010	5,350	2,097	39%	3,253

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	N/A	405	N/A	N/A
1999	2,248	487	22%	1,761
2000	2,193	409	19%	1,784
2001	1,993	392	20%	1,601
2002	2,072	288	14%	1,784
2003	2,040	190	10%	1,850
2004	1,825	364	20%	1,461
2005	1,789	644	36%	1,145
2006	1,993	759	38%	1,234
2007	2,107	659	30%	1,448
2008	2,168	641	30%	1,527
2009	2,166	627	29%	1,539
2010	1,801	665	37%	1,136

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	5,608	3,078	54%	2,530
1999	7,034	3,634	51%	3,400
2000	6,475	3,098	47%	2,477
2001	6,050	3,090	51%	2,960
2002	6,173	3,133	51%	3,040
2003	7,469	3,069	41%	4,400
2004	9,194	4,554	50%	4,629
2005	9,685	3,736	39%	5,949
2006	9,731	3,851	40%	5,880
2007	9,099	3,842	40%	5,257
2008	9,590	4,143	43%	5,447
2009	10,175	4,378	43%	5,797
2010	9,930	4,403	44%	5,527

	Total	IV-E	% of	Non-IV-E
	Cascload	Caseload	IV-E	Caseload
1998	3,138	1,600	51%	1,538
1999	2,919	1,624	56%	1,295
2000	3,045	2,705	89%	340
2001	2,959	2,739	93%	220
2002	2,971	3,021	101%	-50
2003	3,014	1,882	62%	1,132
2004	3,124	1,873	60%	1,251
2005	3,238	2,309	71%	921
2006	3,434	2,311	67%	1,123
2007	3,616	1,982	54%	1,634
2008	3,522	1,899	54%	1,623
2009	3,657	1,749	48%	1,908
2010	3,770	1,789	47%	1,981

	Total	IV-E	% of	Non-IV-E
_	Caseload	Cascload	IV-E	Caseload
1998	112,767	79,982	71%	32,785
1999	117,937	78,222	66%	39,715
2000	112,807	74,469	66%	38,338
2001	107,168	65,960	62%	41,208
2002	90,692	58,747	65%	31,945
2003	87,278	56,266	65%	31,012
2004	82,641	52,738	64%	29,903
2005	80,247	49,803	62%	30,444
2006	78,373	47,486	61%	30,887
2007	73,998	43,930	57%	30,068
2008	67703	40,981	61%	26,722
2009	60,198	36,993	61%	23,205
2010	57,708	33,188	58%	24,520

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	7,951	3,004	38%	4,947
1999	7,639	2,653	35%	4,986
2000	7,533	2,552	34%	4,981
2001	7,138	2,673	37%	4,465
2002	9,209	2,345	25%	6,864
2003	8,754	2,645	30%	6,109
2004	8,196	2,538	31%	5,658
2005	8,213	2,624	32%	5,589
2006	8,139	2,554	31%	5,585
2007	7,777	2,325	29%	5,452
2008	7,964	2,170	27%	5,794
2009	7,927	2,104	27%	5,823
2010	6,980	2,041	29%	4,939

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	6,683	4,315	65%	2,368
1999	7,487	4,528	60%	2,959
2000	6,996	3,292	47%	3,704
2001	7,440	2,788	37%	4,652
2002	6,007	1,996	33%	4,011
2003	6,742	1,777	26%	4,956
2004	6,803	2,714	40%	4,089
2005	6,249	2,530	40%	3,719
2006	6,365	2,358	37%	4,007
2007	5,764	2,453	42%	3,311
2008	5,373	2,273	42%	3,100
2009	4,761	1,951	41%	2,810
2010	4,462	1,670	37%	27,920

_	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	1,480	386	26%	1,094
1999	1,193	378	32%	815
2000	1,098	410	37%	688
2001	1,023	405	40%	618
2002	886	403	45%	485
2003	814	290	36%	524
2004	849	279	33%	570
2005	962	225	23%	737
2006	1,074	195	18%	879
2007	1,157	193	16%	964
2008	938	213	22%	725
2009	814	188	23%	626
2010	739	201	27%	538

Dist	rict of Col	umbia		
	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	3,188	1,241	40%	1,897
1999	3,466	1,297	37%	2,169
2000	3,054	1,960	64%	1,094
2001	3,339	1,619	48%	1,720
2002	3,321	1,435	43%	1,886
2003	3,092	1,500	49%	1,592
2004	2,641	1,263	48%	1,378
2005	2,519	1,218	48%	1,301
2006	2,378	961	40%	1,417
2007	2,197	887	40%	1,310
2008	2,217	877	40%	1,340
2009	2,111	919	44%	1,192
2010	2,066	902	44%	1,164

Florida				
	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	26,320	8,374	32%	17,946
1999	34,292	8,842	26%	25,450
2000	36,608	9,395	26%	27,213
2001	32,477	6,852	21%	25,625
2002	31,963	8,345	26%	23,618
2003	30,677	7,863	26%	22,814
2004	28,864	9,069	31%	19,795
2005	29,312	7,903	27%	21,409
2006	29,229	7,540	26%	21,689
2007	26,788	7,308	27%	19,480
2008	22,187	6,266	28%	15921
2009	19,156	5,261	27%	13,895
2010	18,753	6,127	33%	12,626

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	9,937	4,291	43%	5,646
1999	11,991	4,209	35%	7,782
2000	11,204	4,191	37%	7,013
2001	13,175	4,658	35%	8,517
2002	13,149	5,268	40%	7,881
2003	13,578	3,367	25%	10,211
2004	14,216	4,321	30%	9,895
2005	13,965	5,135	37%	8,830
2006	13,175	4,670	35%	8,505
2007	12,197	3,801	31%	8,396
2008	9,984	3,613	36%	6,371
2009	8,020	3,384	42%	4,636
2010	6,895	2,755	40%	4,140

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	2,441	1,186	49%	1,255
1999	2,205	1,101	50%	1,104
2000	2,401	1,126	47%	1,275
2001	2,854	1,195	42%	1,659
2002	2,655	1,182	44%	1,473
2003	2,919	996	34%	1,923
2004	2,942	1,103	37%	1,839
2005	2,745	1,271	46%	1,474
2006	2,355	1,271	54%	1,084
2007	1,940	977	50%	963
2008	1,622	628	39%	994
2009	1,455	471	32%	984
2010	1,215	473	39%	742

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	963	441	46%	522
1999	959	510	53%	449
2000	1,015	568	56%	447
2001	1,114	491	44%	623
2002	1,246	542	43%	704
2003	1,401	692	49%	709
2004	1,565	819	52%	746
2005	1,818	896	49%	922
2006	1,850	1,001	54%	849
2007	1,870	1,035	55%	835
2008	1,723	1,000	58%	723
2009	1,446	1,005	70%	441
2010	1,462	963	66%	499

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	48,737	32,646	67%	16,091
1999	34,327	28,592	83%	5,735
2000	29,565	23,289	79%	6,276
2001	28,202	20,210	72%	7,992
2002	24,344	19,628	81%	4,716
2003	21,608	20,486	95%	1,122
2004	19,931	20,080	100%	-149
2005	19,431	18,070	93%	1,361
2006	18,367	16,944	92%	1,423
2007	17,864	15,462	86%	2,402
2008	17,843	14,449	81%	3,394
2009	17,080	13,727	80%	3,353
2010	17,730	13,292	75%	4,438

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	5,070	3,741	74%	1,329
1999	8,933	3,963	44%	4,970
2000	7,482	3,293	44%	4,189
2001	8,383	2,589	31%	5.794
2002	8,478	2,601	31%	5,877
2003	8,815	2,366	27%	6,449
2004	9,778	1,680	17%	8,098
2005	11,243	1,898	17%	9,345
2006	11,401	2,109	18%	9,292
2007	11,295	2,693	23%	8,602
2008	11,903	2,394	20%	9,509
2009	12,437	2,811	23%	9,626
2010	12,276	3,087	25%	9,189

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	N/A	2,107	N/A	N/A
1999	4,854	2,810	58%	2,044
2000	5,068	2,796	55%	2,272
2001	5,202	2,281	44%	2,921
2002	5,238	1,560	30%	3,678
2003	5,011	1,502	30%	3,509
2004	5,384	1,972	37%	3,412
2005	6,794	2,060	30%	4,734
2006	9,040	2,188	24%	6,852
2007	8,005	1,926	23%	6,079
2008	6,743	1,659	25%	5,084
2009	6,564	1,514	23%	5,050
2010	6,533	1,471	23%	5,062

	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	8,488	775	9%	7,713
1999	6,774	2,356	35%	4,418
2000	6,569	2,252	34%	4,317
2001	6,409	2,270	35%	4,139
2002	6,190	1,777	29%	4,413
2003	5,781	1,535	27%	4,246
2004	6,060	2,282	38%	3,778
2005	5,833	2,327	40%	3,506
2006	6,237	2,578	41%	3,659
2007	6,631	1,813	27%	4,818
2008	6,306	1,201	19%	5,105
2009	5,691	1,281	23%	4,410
2010	5,979	1,245	21%	4,734

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	N/A	2,936	N/A	N/A
1999	5,942	3,019	51%	2,923
2000	6,017	3,161	53%	2,856
2001	6,165	3,248	10%	2,917
2002	6,814	3,227	47%	3,587
2003	6,888	3,432	50%	3,456
2004	6,998	3,417	49%	3,581
2005	7,220	3,462	48%	3,758
2006	7,606	3,589	47%	4,017
2007	7,207	3,562	47%	3,645
2008	7,182	3,387	47%	3,795
2009	6,872	3,279	48%	3,593
2010	6,983	2,921	42%	4,062

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	6,301	3,138	50%	3,163
1999	5,581	2,908	52%	2,673
2000	5,406	2,555	47%	2,851
2001	5,024	2,547	51%	2,477
2002	4,829	3,060	42%	1,769
2003	4,541	3,043	67%	1,498
2004	4,397	2,995	68%	1,402
2005	4,833	3,024	63%	1,809
2006	5,213	3,074	59%	2,139
2007	5,333	2,820	52%	2,513
2008	5,065	2,857	56%	2,208
2009	4,786	2,688	56%	2,098
2010	4,453	2,562	58%	1,891

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	3,595	1,659	46% —	1,936
1999	3,154	2,013	64%	1,141
2000	3,191	2,453	77%	738
2001	3,226	2,484	77%	742
2002	3,084	2,028	66%	1,056
2003	2,760	1,380	50%	1,380
2004	2,584	1,319	51%	1,265
2005	2,309	1,472	64%	837
2006	2,076	1,405	68%	671
2007	1,971	1,035	52%	936
2008	1,864	988	53%	876
2009	1,646	931	57%	715
2010	1,543	957	62%	586

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	12,890	4,785	37%	8,105
1999	13,455	5,091	38%	8,364
2000	13,113	5,764	44%	7,349
2001	12,564	5,612	45%	6,952
2002	12,026	5,055	42%	6,971
2003	11,521	4,547	40%	6,974
2004	11,111	4,051	36%	7,060
2005	10,867	3,613	33%	7,254
2006	10,681	3,391	32%	7,290
2007	8,415	3,346	33%	5,069
2008	7,613	3,250	43%	4,363
2009	7,052	2,697	38%	4,355
2010	6,098	2,145	35%	3,953

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	N/A	7,464	N/A	N/A
1999	11,169	7,340	66%	3,829
2000	11,619	3,935	34%	7,684
2001	11,568	4,399	38%	7,169
2002	12,510	4,212	34%	8,298
2003	12,608	4,349	34%	8,259
2004	12,562	4,974	40%	7,588
2005	12,197	4,678	38%	7,519
2006	11,499	3,619	31%	7,880
2007	10,497	2,856	27%	7,641
2008	10,427	2,648	25%	7,779
2009	9,650	2,285	24%	7,365
2010	8,958	2,191	24%	6,767

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	N/A	8,826	N/A	N/A
1999	20,300	9,338	46%	10,962
2000	20,034	9,923	50%	10,111
2001	20,896	9,313	45%	11,583
2002	21,251	8,258	39%	12,993
2003	21,376	7,458	35%	13,918
2004	21,173	6,742	32%	14,431
2005	20,498	6,044	29%	14,454
2006	20,142	4,841	24%	15,301
2007	20,830	4,385	21%	16,445
2008	20,171	4,144	21%	16,027
2009	17,723	4,047	23%	13,676
2010	16,412	4,165	25%	12,247

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	8,618	3,805	44%	4,813
1999	8,996	4,115	46%	4,881
2000	8,530	4,069	48%	4,461
2001	8,167	3,873	47%	4,294
2002	8,052	3,566	44%	4,486
2003	6,770	3,205	47%	3,565
2004	6,540	2,809	43%	3,731
2005	6,978	2,969	43%	4,009
2006	7,156	2,733	38%	4,423
2007	6,711	2,661	39%	4,050
2008	6,028	2,503	42%	3,525
2009	5,410	2,110	39%	3,300
2010	5,050	1,800	36%	3,250

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	3,359	1,016	30%	2,343
1999	3,196	1,000	31%	2,196
2000	3,292	1,034	31%	2,258
2001	3,443	839	34%	2,604
2002	2,686	500	19%	2,186
2003	2,712	652	23%	2,060
2004	2,989	640	21%	2,349
2005	3,269	688	21%	2,581
2006	3,126	882	28%	2,244
2007	3,328	888	26%	2,440
2008	3,292	921	28%	2,371
2009	3,320	1,005	30%	2,315
2010	3,582	999	28%	2,583

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	12,495	5,748	46%	6,747
1999	12,577	5,621	45%	6,956
2000	13,181	5,695	43%	7,486
2001	13,349	5,770	43%	7,579
2002	13,029	5,766	44%	7,263
2003	11,900	5,806	49%	6,094
2004	11,778	5,401	46%	6,377
2005	11,433	4,978	44%	6,455
2006	10,181	4,999	49%	5,182
2007	10,282	4,024	40%	6,258
2008	7,607	3,298	43%	4,309
2009	9,912	3,091	31%	6,821
2010	9,880	3,166	32%	6,714

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	1,991	857	43%	1,134
1999	2,156	950	44%	1,206
2000	2,180	940	43%	1,240
2001	2,008	737	37%	1,271
2002	1,912	767	40%	1,145
2003	1,866	1,734	93%	132
2004	2,030	932	46%	1,098
2005	2,222	967	44%	1,255
2006	1,909	1,110	58%	799
2007	1,737	944	54%	793
2008	1,600	808	51%	792
2009	1,639	588	36%	1,051
2010	1,723	627	36%	1,096

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	N/A	1,569	N/A	N/A
1999	5,146	1,477	29%	3,669
2000	5,674	1,643	29%	4,034
2001	6,254	1,211	20%	5,043
2002	5,724	1,047	18%	4,677
2003	5,148	1,043	20%	4,105
2004	6,292	1,493	24%	4,799
2005	6,231	2,032	33%	4,199
2006	6,187	1,244	20%	4,943
2007	5,875	1,403	23%	4,472
2008	5,591	1,493	27%	4,098
2009	5,343	1,310	25%	4,033
2010	5,358	1,369	26%	3,989

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	N/A	1,119	N/A	N/A
1999	N/A	1,345	N/A	N/A
2000	1,615	1,335	83%	280
2001	2,959	983	33%	1,976
2002	3,027	769	25%	2,258
2003	3,605	1,442	40%	2,163
2004	4,037	1,275	32%	2,762
2005	4,654	1,348	29%	3,306
2006	5,069	1,451	29%	3,618
2007	5,070	1,454	28%	3,616
2008	5,023	1,910	38%	3,113
2009	4,779	2,190	46%	2,589
2010	4,806	2,083	43%	2,723

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	N/A	714	N/A	N/A
1999	1,385	625	45%	76 0
2000	1,311	791	60%	520
2001	1,288	563	44%	725
2002	1,291	560	43%	731
2003	1,217	664	55%	553
2004	1,236	648	52%	588
2005	1,178	695	59%	483
2006	1,146	612	53%	534
2007	1,102	554	51%	548
2008	1,029	556	54%	473
2009	930	471	51%	459
2010	839	436	52%	403

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Cascload
1998	9,191	5,593	61%	3,598
1999	9,494	6,124	64%	3,371
2000	9,794	6,238	64%	3,556
2001	10,666	6,366	60%	4,300
2002	11,442	6,388	56%	5,054
2003	12,816	5,800	45%	7,016
2004	12,289	4,971	40%	7,318
2005	11,211	3,456	31%	7,755
2006	10,623	2,865	27%	7,758
2007	9,056	3,325	36%	5,731
2008	8,510	2,911	34%	5,599
2009	7,809	3,461	44%	4,348
2010	7,172	4,226	59%	2,946

	Total Cascload	IV-E Caseload	% of IV-E	Non-IV-E Cascload
1998	821	782	95%	39
1999	1,941	1,183	61%	758
2000	1,912	1,505	79%	407
2001	1,757	1,289	73%	468
2002	1,885	1,340	71%	545
2003	2,122	1,399	66%	723
2004	2,157	1,649	76%	508
2005	2,316	1,696	73%	620
2006	2,357	1,692	72%	665
2007	2,423	1,531	63%	892
2008	2,221	1,447	65%	774
2009	2,009	1,258	63%	751
2010	1,869	1,092	58%	777

	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	53,555	40,762	76%	12,793
1999	51,159	38,049	74%	13,110
2000	47,118	33,529	71%	13,589
2001	43,365	28,916	67%	14,449
2002	40,753	25,173	62%	15,580
2003	37,067	21,735	59%	15,332
2004	33,445	18,923	57%	14,522
2005	30,458	16,426	54%	14,032
2006	29,973	12,313	41%	17,660
2007	30,072	12,837	42%	17,235
2008	29,493	13,206	45%	16,287
2009	27,992	12,769	46%	15,223
2010	26,783	12,724	48%	14,059

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	11,314	4,662	41%	6,652
1999	11,339	4,854	43%	6,485
2000	10,847	4,118	38%	6,729
2001	10,130	3,864	38%	6,266
2002	9,527	2,438	26%	7,089
2003	9,534	3,024	32%	6,510
2004	10,077	4,021	40%	6,056
2005	10,698	4,189	39%	6,509
2006	11,115	4,434	40%	6,681
2007	10,827	4,791	44%	6,036
2008	9,841	4,480	46%	5,361
2009	9,547	3,597	38%	5,950
2010	8,828	3,197	36%	5,631

	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	1,125	493	44%	632
1999	1,131	486	43%	645
2000	1,129	492	44%	637
2001	1,167	454	38%	713
2002	1,197	512	43%	685
2003	1,238	526	42%	712
2004	1,314	495	38%	819
2005	1,370	483	35%	887
2006	1,331	449	34%	882
2007	1,263	423	33%	840
2008	1,223	363	30%	86o
2009	1,224	376	31%	848
2010	1,077	375	35%	702

	Total	IV-E	% of	Non-IV-E
	Cascload	Caseload	IV-E	Caseload
1998	19,007	15,289	80%	3,718
1999	19,249	15,183	78%	4,066
2000	19,364	15,472	78%	3,892
2001	20,696	16,448	79%	4,248
2002	21,038	14,783	70%	6,255
2003	19,323	13,888	72%	5,435
2004	18,004	12,821	71%	5,183
2005	17,446	12,100	69%	5,346
2006	16,631	**	**	**
2007	14,532	7,799	45%	6,733
2008	13,703	6,599	48%	7,104
2009	12,197	8,027	66%	4,170
2010	11,949	7,446	62%	4,503

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	7,233	3,413	47%	3,820
1999	8,173	4,039	49%	4,134
2000	8,406	5,111	61%	3,295
2001	8,674	5,201	60%	3,473
2002	8,812	4,402	50%	4,410
2003	9,252	4,025	43%	5,227
2004	11,325	3,808	34%	7,517
2005	11,393	4,563	40%	6,830
2006	11,816	5,186	44%	6,630
2007	11,785	5,296	44%	6,489
2008	10,595	4,929	47%	5,666
2009	8,712	3,895	45%	4,817
2010	7,857	3,308	42%	4,549

	Total	IV-E	% of	Non-IV-E
	Cascload	Caseload	IV-E	Caseload
1998	7,266	3,325	46%	3,941
1999	9,278	3,193	34%	6,085
2000	9,193	3.715	40%	5,478
2001	8,966	3,490	39%	5,476
2002	9,101	3,520	39%	5,581
2003	9,117	3,787	41%	5,330
2004	10,048	4,241	42%	5,807
2005	11,020	4,554	41%	6,466
2006	10,661	4,848	45%	5,813
2007	9,562	4,515	45%	5,047
2008	8,988	3,418	38%	5,570
2009	8,650	3,045	35%	5,605
2010	9,001	3,190	35%	5,811

Pennsylvania					
	Total	IV-E	% of	Non-IV-E	
	Caseload	Caseload	IV-E	Caseload	
1998	23,070	18,586	81%	4,484	
1999	22,690	15,054	66%	7,636	
2000	21,631	12,548	58%	9,083	
2001	21,237	11,334	53%	9,903	
2002	21,410	13,485	63%	7,925	
2003	21,845	10,952	50%	10,893	
2004	21,944	10,076	46%	11,868	
2005	21,691	14,381	66%	7,310	
2006	21,135	13,410	63%	7,725	
2007	20,999	14,868	71%	6,131	
2008	19,218	14,564	76%	4,654	
2009	16,878	14,690	87%	2,188	
2010	15,346	14,690	96%	656	

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	2,844	755	27%	2,089
1999	2,621	629	24%	1,992
2000	2,302	743	32%	1,559
2001	2,414	751	31%	1,663
2002	2,383	702	30%	1,681
2003	2,357	669	28%	1,688
2004	2,414	601	25%	1,813
2005	2,509	692	28%	1,817
2006	2,842	804	28%	2,038
2007	2,768	751	27%	2,017
2008	2,407	703	29%	1,704
2009	2,112	683	32%	1,429
2010	2,086	592	28%	1,494

Sout	South Carolina					
	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload		
1998	4,644	1,350	29%	3,294		
1999	4,545	1,146	26%	3,349		
2000	4,525	1,339	30%	3,186		
2001	4,774	1,587	33%	3,187		
2002	4,818	1,914	40%	2,904		
2003	4,801	1,594	33%	3,207		
2004	4,635	1,169	25%	3,466		
2005	4,757	1,039	22%	3,718		
2006	4,920	676	14%	4,244		
2007	5,147	1,017	19%	4,130		
2008	4,999	1,141	23%	3,858		
2009	4,938	1,153	23%	3,785		
2010	4,485	1,174	26%	3,311		

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Cascload
1998	N/A	253	N/A	N/A
1999	1,101	340	31%	761
2000	1,215	413	34%	802
2001	1,367	463	36%	904
2002	1,396	500	36%	896
2003	1,537	470	31%	1,067
2004	1,582	446	28%	1,136
2005	1,704	378	22%	1,326
2006	1,648	428	26%	1,220
2007	1,566	376	24%	1,190
2008	1,482	323	22%	1,159
2009	1,484	431	29%	1,053
2010	1,485	590	40%	895

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	N/A	6,405	N/A	N/A
1999	10,796	6,327	59%	4,469
2000	10,144	6,290	62%	3,854
2001	9,679	6,078	63%	3,601
2002	9,359	5,647	60%	3,712
2003	9,487	5,479	58%	4,008
2004	9,590	5,375	56%	4,215
2005	9,017	5,980	66%	3,037
2006	8,618	3,264	38%	5,354
2007	7,751	2,831	36%	4,920
2008	7,219	2,507	35%	4,712
2009	6,723	2,408	36%	4,315
2010	6,786	2,981	44%	3,805

	Total	IV-E	% of	Non-IV-E
0	Cascload	Caseload	IV-E	Cascload
1998	17,103	6,405	37%	10,698
1999	16,326	6,757	41%	9,569
2000	18,190	7,123	39%	11,067
2001	19,739	7,609	39%	12,130
2002	21,353	8,431	39%	12,922
2003	21,880	9,429	43%	12,451
2004	24,529	10,951	45%	13,578
2005	28,883	13,239	46%	15,644
2006	30,848	14,266	46%	16,582
2007	30,137	14,362	47%	15,775
2008	28154	12,764	45%	15,390
2009	26,686	11,810	44%	14,876
2010	28,954	11,971	41%	16.983

	Total Caseload	IV-E Caseload	% of IV-E	Non-IV-E Caseload
1998	2,468	1,122	45%	1,346
1999	2,273	730	38%	1,543
2000	1,805	763	42%	1,042
2001	1,957	7 97	41%	1,160
2002	2,025	707	35%	1,318
2003	2,033	710	35%	1,323
2004	2,108	836	40%	1,272
2005	2,285	820	36%	1,465
2006	2,427	872	36%	1,555
2007	2,765	938	34%	1,827
2008	2,714	867	32%	1,847
2009	2,759	867	31%	1,892
2010	2,886	902	31%	1,984

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	1,316	1,091	83%	225
1999	1,445	1,151	80%	294
2000	1,389	1,159	83%	230
2001	1,382	997	72%	385
2002	1,526	986	65%	540
2003	1,409	931	66%	478
2004	1,432	816	57%	616
2005	1,436	816	57%	620
2006	1,379	785	57%	594
2007	1,309	750	57%	559
2008	1,200	664	55%	536
2009	1,062	664	63%	398
2010	933	528	57%	405

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	6,838	3,297	55%	3,086
1999	6,778	3,260	48%	3,518
2000	6,789	3,327	49%	3,462
2001	6,866	3,251	47%	3,615
2002	7,109	4,137	58%	2,972
2003	7,046	4,200	60%	2,846
2004	6,869	4,232	62%	2,637
2005	7,022	4,115	59%	2,907
2006	7,843	3,680	47%	4,163
2007	7,718	3,549	47%	4,169
2008	7,099	3,694	52%	3,405
2009	5,927	3,369	57%	2,558
2010	5,326	2,870	54%	2,456

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Cascload
1998	8,980	2,259	25%	6,721
1999	8,688	2,603	30%	6,085
2000	8,945	2,694	30%	6,251
2001	9,101	3,127	34%	5,974
2002	9,669	3,576	37%	6,093
2003	9,213	3,473	38%	5,740
2004	9,368	3,592	38%	5,776
2005	10,068	3,728	37%	6,340
2006	10,457	4,019	38%	6,438
2007	11,107	4,024	36%	7,083
2008	11,167	4,175	37%	6,992
2009	9,922	4,175	42%	5,747
2010	10,136	4,159	41%	5,977

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	3,082	792	26%	2,290
1999	3,169	823	26%	2,346
2000	3,388	855	25%	2,533
2001	3,298	881	27%	2,417
2002	3,220	956	30%	2,264
2003	4,069	864	21%	3,205
2004	3,990	813	20%	3,177
2005	4,627	524	11%	4,103
2006	4,012	892	22%	3,120
2007	4,432	1,245	28%	3,187
2008	4,412	980	22%	3,432
2009	4.237	980	23%	3,257
2010	4,097	1,012	25%	3,085

	Total	IV-E	% of	Non-IV-E
	Caseload	Caseload	IV-E	Caseload
1998	10,076	5,365	12%	4,711
1999	10,868	4,037	37%	6,831
2000	10,504	4,329	41%	6,175
2001	9,497	4,311	45%	5,186
2002	8,744	3,796	43%	4,948
2003	7,824	3,025	39%	4,799
2004	7,812	2,390	31%	5,422
2005	8,109	2,920	36%	5,189
2006	7,556	2,822	37%	4,734
2007	7,541	2,789	37%	4,752
2008	7,403	2,217	30%	5,186
2009	6,785	2,217	33%	4,568
2010	6,575	2,151	33%	4,424

	Total	IV-E	% of	Non-IV-E
	Caseload	Cascload	IV-E	Caseload
1998	883	324	37%	559
1999	774	242	31%	532
2000	815	311	38%	504
2001	965	309	32%	656
2002	921	312	34%	609
2003	1,052	289	27%	763
2004	1,184	203	17%	981
2005	1,244	145	12%	1,099
2006	1,304	161	12%	1,143
2007	1,231	138	11%	1,093
2008	1,154	130	11%	1,024
2009	1,155	130	11%	1,025
2010	981	120	12%	861

- Quantitative statistical reporting summarizes and analyses only the responses of the 67 who answered every question and participated at every stage. Qualitative reporting and quotes may include perspectives from the larger group of participants.
- McGowan, B., Auerbach, C., & Strolin-Goltzman, J. (2009) Turnover in the child welfare workforce: A different perspective. Journal of Social Service Research, 35 (3), 228-235; Thoma, R. (2003). A critical look at the child welfare system caseworker turnover. Washington, DC: CWLA
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- Pucci, MA, A. (2009). 2009 salary study. Washington, DC: CWLA.
- 5 CWLA Standards of Excellence for services for abused and neglected children and their families (1999)
- 6 CWLA Standards of Excellence for Services to Strengthen and Preserve Families with Children 2003
- 7 CWLA Standards of Excellence for Adoption Services 2000
- 8 CWLA Standards of Excellence for Family Foster Care Services 1995
- "Trends in Foster Care 2002-2010" http://www.acf.hhs.gov/programs/cb/stats_research/afcars/trends_june2011.pdf
- This polling question read, "In reference to the capacity of the child welfare services available in your community, how much emphasis is placed on foster care as a service for children and families?" The responses included, (1) "Appropriate emphasis, I feel that foster care is used when determined appropriate," (2) "Overemphasis, I feel that foster care is the main resource available or used," and (3) Underutilized emphasis, I feel that foster care is either underutilized or not available at the level it is needed."
- ¹¹ See appendix for definitions of the services mentioned.
- 12 AFCARS
- 13 See appendix for penetration rates over time.
- ¹⁴ J. McComb, CWLA Senior State Leadership Liason, e-mail, September 1, 2011.
- National study on differential response in child welfare. (2006). Available online at http://www.americanhumane.org/as-sets/pdfs/children/pc-2006-national-study-differential-response.pdf. Washington, DC. American Humane Association.
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 - Note: The penetration rate is a CWLA calculation of special Children's Bureau data on state IV-E Foster Care expenditures.

Exhibit 2

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Home Standards Child Protective Services (PA/CPS) PA/CPS 14 - Personnel

STANDARDS FOR PUBLIC AGENCIES

CURRENTLY VIEWING

Child Protective Services (PA-CPS)

Child Protective Services - Definition

PA-CPS 1 - Access to Service

PA-CPS 2 - Community Partnership

PA-CPS 3 - Service Philosophy

PA-CPS 4 - Screening

PA-CPS 5 - Investigation

PA-CPS 6 - Safety Assessments

PA-CPS 7 - Assessment

PA-CPS 8 - Service Planning and Monitoring

PA-CPS 9 - Child Protective Case Management Services

PA-CPS to - Removing Children from the Home

PA-CPS 11 - Child Placement

PA-CPS 12 - Child and Youth Permanency

PA-CPS 13 - Case Closing

PA-CPS 14 - Personnel

ADMINISTRATION AND MANAGEMENT STANDARDS

SERVICE DELIVERY ADMINISTRATION STANDARDS

SERVICE STANDARDS

WHO IS ACCREDITED?



Private Organization Accreditation

Family Services of Southeast Texas strengthens families through accessible, affordable counseling services and education for Issues affecting family life, mental health and employment. We also provide comprehensive domestic violence shelter and support services.

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VOLUNTEER TESTIMONIAL

PA-CPS 14: Personnel

Personnel are qualified and receive support to provide immediate and ongoing services to children in need of protection.

Purpose

Child Protective Services protect children from abuse and neglect and increase child well-being and family stability.

Note: When the agency is unable to fully implement one or more personnel standards, intensive efforts should be made to fully implement the other standards. For example, if the agency is unable to recruit workers with specific qualifications, it can ensure that appropriate supervision and workload standards are implemented.

Table of Evidence

PA-CPS 14.01

Child protection workers are qualified by:

- a, an advanced degree in social work or a comparable human service field; or
- a bachelor's degree in social work or a comparable human service field with two years of related experience.

PA-CPS 14.02

Supervisors are qualified by an advanced degree in social work or a comparable human service field and at least two years experience working with children and families, preferably in child protective services.



read moren

Judy Kay, LCSW

Volunteer Roles: Peer Reviewer: Team Leader

In administration for 22 of 24 years at Child Saving Institute, a COA-accredited not-for-profit child welfare agency in Omaha, Nebraska. Retired approximately two years ago, I moved to Tucson, Arizona, where I advocate for children's rights as a Court Appointed Special Advocate (CASA) volunteer to three young children.

PA-CPS 14.03

Child protection workers have the competencies needed to:

- a. empower and engage families;
- b. assess risk and safety and identify families with special needs;
- c. collaborate with community providers;
- d. exercise good judgment and competent decision making; and
- e. work with the court system when necessary.

Interpretation: Competency can be demanstrated through education, training, or experience.

PA-CPS 14.04

Child protective services workers and supervisors, depending on job responsibilities, are knowledgeable about relevant provisions of the Indian Child Welfare Act (ICWA), including:

- a. the Importance of ICWA and special considerations for working with Indian children;
- b. the identification of Indian children;
- c. determination of jurisdiction;
- d. appropriate notice and collaboration with the child's tribe.
- e. active efforts to prevent removal or reunify families;
- f. placement preferences that support the child's connection to their native culture and heritage; and
- g. court procedures.

Interpretation: The agency can consider the average number of cases where the Indian Child Welfare Act applies when determining which personnel need to be trained. Screening personnel must be trained on relevant provisions of the Indian Child Welfare Act.

FP PA-CPS 14.05

A manageable workload, which includes case oad and other organizational responsibilities:

- a. makes it possible for workers to meet practice requirements;
- b. does not impede the achievement of outcomes; and
- takes Into consideration the qualifications and competencies of the worker and case status and complexity.

Interpretation: Case complexity can take into account: intensity of child and family needs, size of the family, and the goal of the case. Generally, investigative workers should manage no more than 12 active investigations at a time including no more than 8 new! nvestigations per month. Ongoing and preventive services workers should be working with no more than 15-18 families (cases) at a time, with no more than 10 children that are in an out-of-home placement. However, there are circumstances under which caseloads may exceed these limits. For example, caseload size may vary depending upon the volume of administrative case functions (e.g., entering notes, filing, etc.) assigned to the worker. Caseloads may also be higher when agencies are faced with temporary vacancies on staff. New personnel should not carry independent caseloads prior to the completion of training.

Note: The evaluation of this standard will Jocus on whether the assigned workload is manageable for staff, but a name account the factors cited in the standard and interpretation. The specific caseload sizes stated in the interpretation are only a suggestion of what might be appropriate. Each agency should determine what as second size is appropriate, and reviewers will evaluate: (1) whether the agency's design ated caseload size reflects a manageable workload, and (2) whether the agency maintains caseloads of the size it deemed appropriate.

Research Note: Two themes in staff retention literature indicate that high caseloads and timeconsuming paperwork are primary factors in child welfare workforce turnover.

PA-CPS 14.06

Supervisory personnel are involved in all decisions related to child safety and permanency, and workers have access to a supervisor by telephone 24 hours a day.

PA-CPS 14.07

Supervisors or experienced workers provide additional support when personnel are new or are still developing competencies.

PA-CPS 14.08

The program director or designee ensures:

- a. work schedules are flexible;
- b. sufficient staff coverage at all times;
- c. supports are in place to prevent burnout; and
- d. non-exempt employees that work overtime are appropriately compensated,

Interpretation: Non-exempt employees are compensated for overtime according to the Fair Labor Standards Act.

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Exhibit 3

GENERAL INVESTIGATIONS

GENERAL INVESTIGATION 1

ALLEGATION

During the course of an investigation, the Office of the Inspector General again identified excessive caseload assignment as an ongoing impediment for child

protection investigators.

While investigating a report of falsification of records, the Inspector General found that the child protection investigator had been assigned new investigations well in excess of the standards established by a federal consent decree. Inspector General investigators reviewed case assignment across all teams for a two-month period. Inspector General investigators found that while levels varied, caseload assignment levels were elevated across all regions of the state. The Inspector General has found that investigators continue to be assigned cases greatly in excess of the standard established by the consent decree intended to ensure the effectiveness and quality of their efforts.

The institutional failings of the Department create a toxic work environment in which it is foreseeable that some investigators will take dangerous shortcuts that can lead to lethal errors.

OIG REGOMMENDATIONS / DEPARTMENT RESPONSES

1. This report will be shared with the court overseeing the BH consent decree.

The Department rejects the report and its recommendations.

OIG Comment: The Inspector General notes that the Department has no authority to reject Office of the Inspector General reports (as opposed to recommendations).

2. The Department must commit to a sustainable remedy to this problem by the end of this fiscal year.

The Department rejects the report and its recommendations.

OIG Comment: The Inspector General notes that the Department has no authority to reject Office of the Inspector General reports (as opposed to recommendations).

DEPARTMENT RESPONSE FOLLOW.



Bruce Rauner Governor George H. Sheldon Director

To: DCFS Office of Inspector General From: George H. Sheldon, Director

Re: Response to "Statewide Investigative Caseloads" Report, OIG File No. 2016-IG-2769

The DCFS Office of Inspector General ("OIG") recommended that: 1) its two-page report titled Statewide Investigative Caseloads should be shared with the court overseeing the B.H. Consent Decree; and 2) that DCFS should commit to a sustainable remedy to this problem by the end of the fiscal year. The Department rejects the two recommendations made in "Statewide Investigative Caseloads" report, OIG File No. 2016-IG-2769 ("Report") and further responds as follows:

The OIG has no authority under rule or procedure to make determinations about whether DCFS is in compliance with the terms of the B.H. Consent Decree. The federal district court in the ongoing B.H. litigation has the authority to make such a determination. Indeed, the investigative caseload issue has been the subject of discussion and review by the B.H. plaintiffs, the Department and the federal court. The OIG concedes that it did not receive a complaint relating to compliance with B.H. caseloads—instead, the OIG chose to look at the issue while in the course of an unrelated investigation of a single child protection worker. It appears that the OIG did not do a full investigation of the issue prior to issuing the 2½ page report. Because this report is beyond the scope of an OIG investigation and is being addressed within the B.H. litigation, the Department rejects the recommendations.

DCFS faces ongoing challenges to compliance with the B.H. Court's caseload requirements. Turnover is high and continuous in the stressful position of Child Protection Investigator. Challenges arise because DCFS is bound to comply with the hiring process as set forth in the Personnel Code, and the provisions of the collective bargaining agreement. Open positions must be offered to current employees within the state and DCFS can hire individuals outside of state government only if there have been no candidates with contractual rights to the positions via job assignment, upward mobility or transfers from other agencies who bid on the position. As more fully set forth in Section III, below, DCFS is taking aggressive steps to try to fill vacancies within the constraints of State of Illinois hiring rules. These challenges are entirely unrelated to budget issues.

The OIG's report and recommendations, however, are based on an insufficient, unreliable and invalid sample of child protection caseload data, a complete misunderstanding of the provisions of the B.H. Consent Decree and a failure to investigate or consider steps already being taken to address caseloads for child protection investigators. When the OIG asked DCFS personnel about the caseloads, Department personnel offered three separate times to provide the OIG with information relating to the plan to deal with the caseload issue. Rather than request and review that information, the OIG instead

issued the report to the Governor's office on May 6, 2016. Thus, the OIG issued the report without becoming fully informed. On the other hand, the Department had previously met with the B.H. plaintiffs' counsel and discussed the detailed plan to address caseloads, and that is the appropriate forum for such discussions. For these reasons, the OIG's report does not contribute to an understanding of the caseload issue, which is already before the parties and the court in the B.H. litigation.

I. OIG Has No Authority to Determine Compliance with B.H. Consent Decree

During the course of an investigation into allegations that a child protection investigator committed falsification of records, the OIG reviewed the caseload of the particular investigator who was the subject of the OIG complaint. The OIG determined that this investigator was assigned caseloads exceeding the limits in the B.H. Consent Decree. The OIG then chose to review the statewide "Protective Service Team by Worker" reports for the two-month period from January to February 2016. Based on this report, the OIG concluded that DCFS was out of the compliance with the caseload standards of the B.H. Consent Decree.

The Children and Family Services Act authorizes the Inspector General to conduct "investigations into allegations of or incidents of possible misconduct, misfeasance, malfeasance, or violations of rules, procedures or laws by an employee, foster parent, services provider or contractor" of DCFS. 20 ILCS 505/35.5(a). The Inspector General is required to adopt rules necessary to carry its functions, purpose, and duties. Id.

DCFS Rule 430.40 sets forth the complaint process for the Inspector General. 89 III. Admn. Code 430.40. The Office of the Inspector General accepts written complaints, including complaints from the general public. All complaints are evaluated to determine if they suggest possible misconduct, misfeasance, malfeasance, or a violation of rules, procedures or statutes by a DCFS employee, foster parent service providers or contractors to determine if a full investigation is warranted. 89 III. Admn. Code 430.40(b), (c). The OIG rule specifies that complaints will not be accepted unless the complaint alleges misconduct, misfeasance or malfeasance or a violation of rules, procedures or statutes or a basis for employee licensure action, the complaint is against a person within the jurisdiction of the Inspector General's office and the allegations can be independently verified through investigation. 89 III. Admn Code 430.40(d).

The OIG failed to adhere to its rules by issuing in the "Statewide Investigative Caseloads" report. The OIG concedes that there was no complaint giving rise to an investigation into caseloads; rather, while the OIG was conducting an investigation into allegations of falsification by a single worker, investigators decided to review statewide caseload data for a two-month period. Even if there had been a complaint, a violation of B.H. caseload standards is not a matter that is properly subject to an OIG investigation. The court may approve a plan to address consent decree standards at any time, may choose to amend the consent decree standards at any time, and may determine whether the department is or is not in compliance. The OIG has authority to investigate misconduct, misfeasance, malfeasance or violations of rules, procedures or laws. The OIG's rules define misfeasance as the "improper performance of some act that a person may lawfully do," and malfeasance as "a wrongful act that the actor has no legal right to do, or any wrongful conduct that affects, interrupts, or interferes with performance of an official duty." 89 III. Admn. Code 430.20. The issue of caseload standards does not fall anywhere within the definition of misfeasance or malfeasance. Nor does it implicate any violation of a rule, procedure or law. Whether caseload standards are sufficient within the terms of the B.H. Consent Decree is a determination for a court, not the OIG.

Also, it does not appear that the OIG conducted a meaningful investigation into the caseload issue in any event. The report details that the OIG investigators "reviewed the statewide January and February 2016 Protective Service Team by Worker reports." While the OIG asked for and received certain limited information about caseloads for a discrete time period, it appears that no telephonic or in-person interviews were conducted, there was no effort to analyze a valid sample nor were there efforts to review the extensive efforts DCFS is making to address caseloads. In fact, the OIG report reflects a lack of understanding about how DCFS analyzes the issue of compliance with B.H. Caseload standards and what DCFS is doing to address the issue.

Indeed, the OIG failed to pursue relevant information that was offered on three separate occasions by DCFS Deputies. Specifically: 1) On May 3, 2016, Diane Moncher from the OIG emailed Nora Harms-Pavelski seeking information on vacancies for child protection. Ms. Harms-Pavelski directed Ms. Moncher to the Office of Employee Services, and also stated, "if you need any information about how we are covering vacancies for whatever doing our coverage plan give me a yell." 2) Tammy Grant responded to Ms. Moncher's email on May 4, 2016 providing a list of vacancies and invited Ms. Moncher to contact her if she had any questions. 3) The next day, Deputy Director of Operations Michael Ruppe emailed Ms. Moncher saying he would be happy to provide information on how Operations has been addressing the workload. None of these three DCFS Deputies heard from anyone in the OIG's office regarding claims of excessive caseloads. Rather than following up, the OIG issued a report to the Governor's office.

II. Background on B.H. Caseload Provisions and Involvement of Plaintiffs and Court

The B.H. Consent Decree provides that "each DCFS child protective services investigator will be assigned no more than 12 new abuse or neglect investigations per month during nine months of a calendar year" and "[d]uring the other three months of the calendar year, the investigator will be assigned no more than 15 new abuse or neglect investigations per month. Neither the nine months nor the three months need occur consecutively." B.H. Consent Decree Par. 26(a).

The B.H. Consent Decree requires a review of child protection caseloads over a calendar year. In the past, DCFS has reviewed child protection caseloads in a variety of ways, including looking at the child protection investigator's average caseload based on an average of the B.H. caseload standards, looking at the child protection investigator's caseloads over a full calendar year and looking at the child protection investigator's caseloads on a rolling twelve-month basis.

The OIG report only looks at the caseloads for child protection investigators for the first two months of 2016. The OIG does not explain its calculations, nor does it state whether the calculations are based on teams or on individual child protection investigators. At one point, the OIG notes that "[a] majority of the teams started the calendar year already in violation of the B.H. Consent Decree. . ," but later states that an OIG investigator determined that 73% of the investigators in the Cook region and 68% of investigators in the Northern Region were over the B.H. limit as of February 2016." (OIG Report, p. 1)

The OIG recommends that the OiG's report be shared with the court overseeing the B.H. decree. (OIG Report, p. 2). This recommendation both overlooks and misapprehends essential components of the B.H. Consent Decree. Paragraph 68 of the B.H. Consent Decree provides that if plaintiffs' counsel asserts that the Department is or is likely to be out of the compliance with any terms of the decree, they shall notify the Department and the parties shall meet to discuss the areas of non-compliance and to prepare a plan for achieving compliance. B.H. Restated Consent Decree, Par. 68(d). Any plan for

compliance shall be submitted to the Court and, subject to the Court's approval, shall be incorporated into the Decree. Id. The Decree expressly prohibits class members from enforcing the Decree solely on isolated instances of non-compliance. B.H. Restated Consent Decree, Pars. 6, 68(e).

The terms of the Consent Decree clearly require the parties to discuss and attempt to resolve any issues of potential concern regarding compliance with the provisions of the Consent Decree. The parties are then required to develop a plan and present the plan to the court for approval.

In fact, during the course of the B.H. litigation, DCFS has had challenges meeting the caseload provisions for child protection investigations set forth in the Decree. In the past, in accordance with the provisions of the Consent Decree, plaintiffs' counsel and DCFS have conferred and developed a plan for compliance. In 2012, the court approved an implementation Plan to Address Investigation Caseloads, which required the hiring of new investigative staff, the hiring on an emergency and temporary basis of retired employees with child protection experience and the temporary assignment of non-investigative DCFS staff to child protection investigator positions.

In April 2016, plaintiffs' counsel in B.H. requested a meeting with DCFS staff to discuss caseload concerns amongst investigative staff. The information provided below was the same information provided to plaintiffs' counsel during that meeting. The discussions that occur between the parties are confidential settlement discussions under the Federal Rules of Evidence.

III. Current DCFS Efforts to Reduce Caseloads for Child Protection Investigators

The OIG's second recommendation is that the Department commit to a sustainable remedy to the caseload problem by the end of this fiscal year. (OIG Report, p. 2) The only information upon which the OIG bases her recommendation is her own analysis of the caseloads for two months for child protection investigators. The OIG apparently made no attempt to interview DCFS management staff regarding their efforts to address the caseload standards, even though the Deputy Directors of Child Protection, Operations and Employee Services expressly offered to provide additional and specific information. Had the OIG done so, she would have learned that DCFS management has been diligently working to develop remedies to the caseload issue for child protection investigators and has engaged in numerous efforts over the past year to address the issue.

A. Regular Review of Caseload and Hiring Data

DCFS Senior Operations management staff review both caseloads and vacancies for child protection staff on a monthly basis. Senior Operations staff reviews a "Child Protection Caseload Report – Details" report from SACIWS which contains the current number of staff, the number of pending cases at the start of the month, the number of newly assigned cases, the average number of newly assigned cases, the number of completed cases, and the number of pending cases at the end of the period. This report gives a slightly more detailed look at the workload of the investigators than the 2016 Protective Service Team by Worker Reports relied upon by the OIG since it indicates to which cases the investigator is assigned, which cases the investigator has pending at the end of the period.

DCFS Senior Operations staff also reviews vacancy reports for child protection positions throughout the state on a monthly basis. Regional personnel liaisons prepare regular reports on status of vacancies to alert Operations management staff of the status in relation to posting, filling and any ongoing challenges. The Operations Senior Deputy maintains close communication with the Office of

Employee Services Deputy regarding the status of vacancies and the filling of those vacancies, including weekly phone conferences regarding vacancy issues.

Additionally, the DCFS Office of Employee Services and the DCFS Office of Finance and Budget review on a weekly basis the list of child protection vacancies. The purpose of this review is to enable the Office of Employee Services to ensure that any open child protection investigator position is posted at the earliest possible time.

B. Current Child Protection Investigation Staffing Issues

DCFS acknowledges that there are currently staffing and vacancy issues for child protection investigators, particularly in the Northern and Central Regions. DCFS shared and discussed data regarding the vacancies with the plaintiffs in B.H. in late April 2016. As of early May, there were 52 vacancies for child protection positions in Northern region, 36 vacancies for child protection investigator positions in the Central Region, 24 vacancies in Cook County and 6 vacancies in the Southern Region. DCFS is currently attempting to staff child protection investigators at a ratio of 10:1 and the vacancy projections listed below are based on the 10:1 case ratio. The 10:1 ratio will attempt to account for leaves of absences and vacation schedules of child protection investigators. The information presented below regarding vacancies and other data is based on a caseload of 10:1 for each child protection investigator.

In any effort to address caseload compliance, DCFS is bound to comply with the state hiring process, as set forth in the Personnel Code, and the provisions of the collective bargaining agreement. When a child protection investigation position becomes vacant, DCFS is first required to post the position for internal staff to bid on the position for ten days. DCFS can only seek to hire individuals outside of state government if there have been no candidates with contractual rights to the positions via job assignment, upward mobility or transfers from other agencies who bid on the position.

For individuals who have never worked for the State of Illinois, who have worked for the State of Illinois but never held certified status, who have been a certified State of Illinois employee and wish to exercise veteran's preference rights or who are a certified non-veteran State of Illinois employee and wish to be seek a new position, the state hiring process commences with the submission of an employment application to Central Management Services (CMS) for a specific position. CMS will "grade" the application based on the education, training and experience provided. If an individual obtains a passing grade, the individuals name will be placed on the open competitive eligible list for a position in the two counties selected on the employment applications. DCFS will request an Open/Competitive Eligibility list from CMS when all efforts to fill the vacancy via the Personnel Code and Master Contract have been exhausted.

C. DCFS Efforts to Expedite the Hiring Process

In December 2015, at the request of Director Sheldon, CMS and the Governor waived Administrative Order #2 relating to the grading process of employment applications by CMS. This action moved the grading of DCFS child protection investigative staff to a priority level for purposes of candidate grading, resulting in the grading of 600 Child Protection Specialist applications and the placement of additional names on the Open/Competitive Eligibility list. The DCFS Office of Employee Services worked closely with staff from CMS to assist candidates who sought to appeal a grade from CMS through the administrative appeal process.

The DCFS Office of Employee Services employs two full time recruiters. One recruiter is located in Chicago and is bi-lingual and the other recruiter is located in Springfield. Recruitment staff regularly attend events to recruit staff and currently maintain a Recruitment Tracking system that tracks the number of potential candidates from each event. Recruitment staff currently recruit at 45 different universities around the state. Regional personnel liaisons prepare regular reports on the status of vacancies to alert Operations management of the status in relation to posting, filling and challenges. The Operations Senior Deputy maintains close communication with the Office of Employee Services Deputy Director regarding vacancies and the filling of vacancies with weekly conversations regarding staffing/vacancy issues. The DCFS Office of Employee Services also advertises vacancy needs on various social media sites, including Linked-In, Facebook, the DCFS External Website and various other organizations through our Communications Office.

Effective March 2016, CMS, at the request of DCFS, expanded the degree requirements for Child Protection Specialists to include degrees in Criminal Justice, Criminal Justice Administration and Law Enforcement. In anticipation of this change, beginning in February 2016, DCFS recruitment staff began advertising the expanded degree requirements at recruitment events in order to encourage applicants with those degrees to apply for child protection investigator positions.

DCFS maintains continuous postings for various counties, including Danville, DeKalb, Elgin, Galesburg, Jacksonville, Kankakee, Quincy, Waukegan, Aurora, Peoria and Urbana. Generally, a position is posted for a maximum of ten days. The continuous posting allows for ongoing, daily advertising of the position on the state job website.

The efforts described above have been effective and resulted in the addition of a number of candidates to eligibility lists across the state. However, DCFS still has a number of counties and offices where there are no individuals on the current eligibility list and those counties include Danville, DeKalb, Elgin, Galesburg, Jacksonville, Kankakee, Quincy, Waukegan, Aurora, Peoria and Urbana. The Office of Employee Services and Office of Budget and Finance review vacancies for approval on a weekly basis in an effort to keep vacancies moving quickly. As soon as a position is expected to become vacant, the Office of Employee Services requests that the Personnel Liaisons put the vacancy into the system in order for DCFS to attempt to fill the position prior to the separation date whenever possible. When the Office of Employee Services and the Office of Budget and Finance review and attempt to fill vacancies, they are doing so at the ratio of 10:1.

DCFS management has worked very closely with AFSCME in order to obtain agreements to waive some of the contractual rights in filling vacancies in an effort to hire external candidates more quickly. The agreements between DCFS and AFSCME involve posting waivers, five-day postings and backfill language.

As of May 2016, CMS reports they currently have approximately 221 Open/Competitive Applications and 90 Promotional Applications to be graded and that they are currently grading applications received as of March 14, 2016. This information is a significant improvement since, in the past, CMS has been more than nine months behind in grading applications. CMS also indicated that it has eight to ten applications in the appeal process at this time.

The Office of Employee Services will be working with Director Sheldon again to make a request to CMS and the Governor's Office to waive Administrative Order #2 to do another sweep of the pending applications in order to expedite the grading process. This again will increase the number of applicants

available on the Open/Competitive Eligibility list, especially in those counties where there are no current candidates.

D. Specific Efforts to Address DCFS Child Protection Caseloads

DCFS utilizes a variety of efforts to address needs of local offices and teams that have either a high number of child protection vacancies or a staff with a high level of newly assigned or pending cases. These efforts are dictated not only by the terms and conditions of the Personnel Code, but also by the provisions of the collective bargaining agreement.

1. Short Term Contracts for Retirees

DCFS continues to utilize retirees on 75-day contracts in an effort to cover offices where DCFS has a high volume of vacancies. Currently, DCFS has two retirees in the Galesburg office, one retiree in Belleville, one retiree in Alton and one retiree in Danville. DCFS continues to reach out to retirees to develop additional resources. In the past, DCFS has used retirees to cover offices where DCFS had a high volume of vacancies in the Northern and Cook regions. DCFS also has in place a 75-day contract with a retired Acting Regional Administrator to assist in the review of undetermined investigations and identify tasks for the field to complete for the finalization of the investigation.

2. Overtime Projects for Staff with Child Protection Experience

DCFS child protection management has developed overtime projects for child protection staff throughout the state. In the Northern Region, DCFS has regularly utilized overtime projects and has specifically used overtime projects for the Waukegan, Joliet and Rockford offices, which are offices where DCFS continually has challenges in filling child protection positions. DCFS currently has an overtime project ongoing in the Central region, including the Danville, Springfield and Urbana offices, and in the past has offered overtime to staff to cover offices in Galesburg, Peoria and Quincy. DCFS has also used overtime projects to cover vacancies in Cook County.

DCFS has also offered overtime to persons who were previously certified as investigators and transferred to other divisions.

3. Plan to Detail Staff with Child Protection Experience

DCFS child protection management has detailed staff in the past in the Northern and Central regions from fully staffed offices to those offices that were experiencing high vacancies. Detailing of child protection investigators is governed by the collective bargaining agreement. An employee shall not be detailed for more than six work weeks in four calendar months and a specific position shall not be filled by detailing for more than 15 work weeks. Article XIV, Section 5, pp. 81. The union and management may agree to reasonable extensions of the time frames where operational needs dictate. Id. DCFS management must first seek volunteers for detail assignments in order of seniority. If there are no volunteers, DCFS staff may be detailed and the detail shall be rotated among qualified employees in inverse seniority order. Article XIV, Section 5, p. 82.

DCFS management detailed child protection investigators from the Southern Region to the Danville office to assist in completing cases. DCFS management also has detailed investigative supervisors to investigator positions when feasible. DCFS management also uses "floaters" to handle cases in offices experiencing high vacancies.

DCFS developed a detail plan for staff, which is set forth below:

Voluntary details:

- 3 detailed to Joliet from Belleville May 13-20
- 4 plus 1 supervisor detailed to Joliet for June 3-10 (1 from Alton, 1 from Belleville, 1 from Carlyle, 1 from Anna, 1 from Granite City)
- 6 plus 1 supervisor detailed to Waukegan for June 3-10 (3 from Olney, 2 from Belleville, 1 from Mt Vernon, 1 from Murphysboro)
- 5 plus 1 supervisor detailed to Rockford for June 10-17 (2 from E St Louis, 3 from Belleville, 1 from Carlyle)

Central Region:

- 5 detailed to Danville (1 from Charleston, 1 from Urbana, 1 from Lincoln, 1 from Bloomington, 1 Bloomington floater)
- 1 detailed to Peoria from Ottawa
- 2 detailed to Galesburg from Rock Island

Northern Region:

- 2 details to Rockford, 1 from Sterling and 1 from Freeport
- 1 detail from Kankakee to Joliet
- 4 details to Elgin from Aurora, however it has been determined since this is the same county these are not considered details
- 3 details to Waukegan from Woodstock

Cook County:

2 detailed to midnights (1 from Harvey, 1 from 1911); 1 from Harvey detailed to after hours, weekends, holidays & CDA's

4. Other Efforts

In addition to the above efforts, DCFS management may delay individuals who are leaving child protection investigator positions to go to other positions in other DCFS divisions or specialties. DCFS undertook this effort primarily in Cook County and Northern Region in conjunction with union notification.

DCFS also is considering some boundary changes in reference to the geographical area that offices cover in the western part of the Northern region. This change will increase the ability to fill vacancies with general candidates on the Open/Competitive Eligibility List. This proposed change would require negotiation with the union prior to any changes.

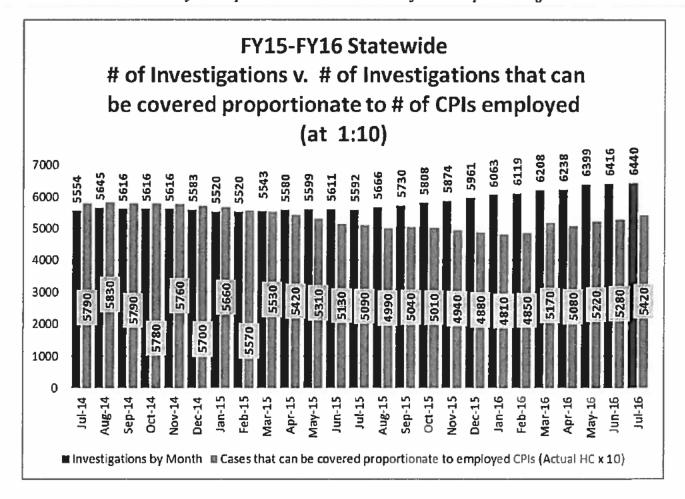
- END OF DEPARTMENT RESPONSE -

OIG Rebuttal: The Cook County Office of the Public Guardian also expressed concern about investigative caseload "that clearly exceed a reasonable workload." As the Cook County Public Guardian further noted,

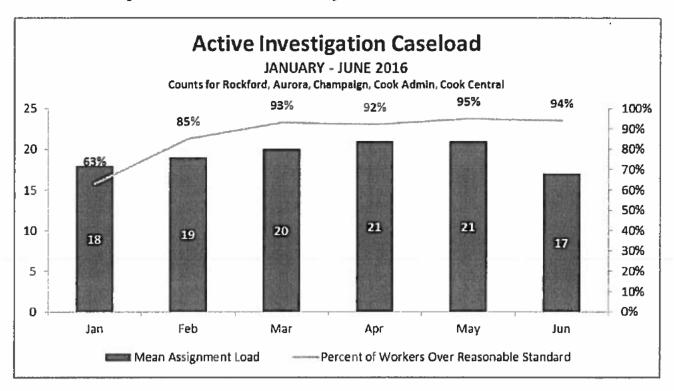
"Even well-intentioned, dedicated and truthful investigators, caseworkers and managers are stymied in their attempts to serve children and families under the weight of overwhelming caseloads." (Letter from the Cook County Public Guardian to Director George Sheldon dated March 2, 2016.)

In 2013 DCFS provided a detailed description of its child welfare workforce as part of its Federal Fiscal Year 2013 Annual Progress and Service Report. The Report noted that caseload size depended on child protection intake, standards set by an Illinois federal court Consent Decree, and outcomes of safety, permanency and well-being of the children and families involved in the child welfare system. Utilizing workforce studies and its valued outcomes for families, Illinois reported that it used a 9:1 Caseload size for Child Protection Specialist to meet its goal of reasonable active investigations. [IDCFS Annual Progress and Services Report Federal Fiscal Year 2013, Chapter X.] The caseworker ratio took into consideration average years of service, benefit time, and administrative as well as investigative tasks and duties. At that time demographic information on its current staff and recent hires found the average child welfare worker had over 13 years of experience.

The graph below tracks DCFS' child protection 10:1 caseload size and intake from July 2014 through July 2016. Beginning in March 2015, the discrepancy between needed headcount and actual headcount has consistently widened statewide as shown in the chart below. The graph is based on caseload data maintained by the Department which is at a ratio of 10 cases per investigator.



According to the DCFS Executive Statistical Summary (dated October 31, 2016) the number of Child Abuse/Neglect Reports Taken increased 16% to 78,581 in FY 16 from the previous fiscal year. While there was a 16% statewide increase in child protection intake, certain areas (Rockford, Aurora, Champaign, Cook Admin and Cook Central) of the state faced crises with insufficient numbers of investigators. The mean assignment load in these areas of the state ranged from 18 to 21 investigations. In the first half of calendar year 2016, the percent of workers in these areas with caseloads exceeding a reasonable standard increased from 63% to 94%.



The Child Welfare League of America in a December 2013 Special Report voiced its expert opinion that it is not possible for CPIs no matter how qualified, experienced, and well-trained to work effectively in caseloads that are too high. [CWLA Special Review Report December 19, 2013.] CWLA recommended child protection caseload be limited to no more than 12 new active cases. A key management function is to ensure that investigative caseloads are tenable. Over the years, investigators workload tasks have increased without lowering caseload size.

Effective management of child protection workloads requires continuous monitoring of workload capacity. Indicators include tracking trends of investigations intakes and population shifts, backlogs of overdue open investigations, use of overtime or unpaid time to complete investigations, noting if there is increasing needs for bi-lingual investigators and increase demands for more investigatory or administrative duties. [IG investigations found that some investigators and supervisors would take a vacation day and work in their office to catch up on their open investigations without the cost response of being assigned a new investigation.] Such monitoring builds the predictive capacity of the agencies to measure workload burdens and afford remedial remedies prior to overburdening workers and increasing the risks to child safety. As the data from FY 2014 suggests, the Department previously took such anticipatory management actions which resulted in reasonable caseloads.

Exhibit 4

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

B.H., et al.,)	
Plaintiffs,)	
**)	No. 88 C 5599
V.)	Hon. Jorge L. Alonso
B.J. WALKER, Acting Director,)	Judge Presiding
Illinois Department of Children and)	
Family Services,)	
)	
Defendant.)	

DECLARATION OF HEIDI DALENBERG

- I, Heidi Dalenberg, depose and state as follows:
- 1. I am a partner at the law firm of Riley Safer Holmes and Cancila, LLP, and I am one of the attorneys representing the Plaintiff class in this action.
- 2. I am an adult over the age of 21 and have never been convicted of a crime. I have personal knowledge of the matters stated herein and if called as a witness could testify competently thereto.
- 3. Attached hereto as Exhibits A to W are true and correct copies of the following documents exchanged between counsel for Plaintiffs¹ herein and the Department and/or its attorneys,² as follows:

Exhibit A:	May 11, 2017, 9:13 AM email from H. Dalenberg to various attorneys
	for the Department requesting data regarding investigator
	assignments.

¹ The attorneys for Plaintiffs involved in the above communications include Heidi Dalenberg, Claire Stewart, Benjamin Wolf, and Charles Peters.

² The attorneys who have represented the Department at the times relevant hereto include Beth Solomon, Lise Spacapan, Barbara Greenspan, Janet Ahern, and Shawn Eddings.

Exhibit B:	Email from Beth Solomon to Plaintiffs' counsel, and copying the Department's counsel, dated June 5, 2017, 2:35 PM, and forwarding a reporte entitled "Average Assigned / Caseloads, Fiscal Year 2017, July 2016-March 2017."
Exhibit C:	June 7, 2017 letter from H. Dalenberg to Barbara Greenspan, and copying the Department's and Plaintiffs' additional counsel.
Exhibit D:	June 12, 2017, 1:18 PM email from H. Dalenberg to the Department's counsel and copying Plaintiffs' additional counsel and the B.H. Experts. ³
Exhibit E:	June 12, 2017, 5:15 PM email from Beth Solomon to Plaintiffs' counsel, DCFS' additional counsel, and the B.H. Experts attaching caseload reports for "various field offices" for FY 16 and FY 17. An exemplar page of the spreadsheet attachment is provided herewith.
Exhibit F:	June 13, 2017, 4:01 PM email from Beth Solomon to Plaintiffs' counsel and copying the Department's additional counsel, which forwards a June 13, 2017 Inter-Office Memorandum from Michael Ruppe, Senior Deputy Director of DCFS, addressing the subject of "Child and Family Service Intern investigation assignment."
Exhibit G:	June 14, 2017, 10:56 AM email from H. Dalenberg to DCFS' counsel and copying Plaintiffs' additional counsel and the B.H. Experts, providing notice to the Department under Paragraph 68(d) of the Decree.
Exhibit H:	June 26, 2017 email from B. Greenspan to Plaintiffs' counsel and copying the Department's additional counsel, forwarding two reports, one entitled "Newly Assigned First Worker CY 16 By Workers," and the other entitled "Newly assigned First Worker CY 17 January to End"
Exhibit I:	June 30, 2017, 3:15 PM email from H. Dalenberg to DCFS' counsel and copying the B.H. Experts.
Exhibit J:	July 7, 2017 letter from H. Dalenberg to B. Greenspan and copying Plaintiffs' and the Department's additional counsel.
Exhibit K:	July 14, 2017 letter from Lise Spacapan to H. Dalenberg and copying the B.H. Experts, additional counsel for Plaintiffs, and additional counsel for the Department. The letter includes attachments A-D

³ The experts appointed by this Court in this matter, Dr. Mark Testa and Marci White, are referred to herein as the "B.H. Experts."

	(provided in full) and spreadsheets provided as E (only exemplar pages are provided here).
Exhibit L:	July 14, 2017 5:54 PM email from H. Dalenberg to DCFS' counsel and copying Plaintiffs' additional counsel and the B.H. Experts, stating again that the Department's reliance on "average" caseload figures is patently invalid under the Decree and insufficient to demonstrate compliance, and July 20, 2017 9:03 AM email from Dalenberg to DCFS' counsel requesting detail regarding how the Department identified the vacancies it needed to fill and its status in achieving that hiring.
Exhibit M:	August 3, 2017 4:28 PM email from Barb Greenspan to Plaintiffs' counsel, which Plaintiffs' counsel forwarded to the B.H. Experts. The email forwards the "2017 Plan to Monitor and Reduce Investigative Caseloads," two reports showing assignments to investigators for CY 2017, January – June (one for "24 hours Assignment" and the other for "72 hours Assignment").
Exhibit N:	August 11, 2017 6:36 PM email from B. Greenspan to H. Dalenberg and copying Plaintiffs' and DCFS' additional counsel, forwarding a Memorandum of Agreement regarding Deferred Assignment Investigations for areas other than Cook County.
Exhibit O:	September 7, 2017 4:10 PM notification from DCFS to H. Dalenberg and copying B. Solomon, stating that the 24-Hour and 72-Hour reports of investigation assignments through September 2017 had been made available, and September 11, 2017 3:44 PM email from B. Solomon to Plaintiffs' counsel and copying additional counsel for DCFS describing the difference between the 24 hour and 72-hour reports of assignments.
Exhibit P:	October 12, 2017 4:10 PM email from H. Dalenberg to DCFS' counsel and copying additional counsel for Plaintiffs requesting, <i>inter alia</i> , updated assignment data for investigators.
Exhibit Q:	October 20, 2017 2:29 PM Email from B. Greenspan to Plaintiffs' counsel and copying additional counsel for DCFS. The email forwards "24 hour" and "72 hour" investigator assignment data for January through September, 2017.
Exhibit R:	November 7, 2017 9:35 AM notice from DCFS to H. Dalenberg and copying Beth Solomon; notice indicates that spreadsheets showing investigator assignments for the period January through October, 2017 were made available.

Exhibit S:	November 8, 2017 3:54 PM email from B. Solomon to Plaintiffs' counsel and copying additional counsel for DCFS. The email forwarded an update on investigator hiring and "detailing" assignments.
Exhibit T:	November 9, 2017 10:13 AM email from H. Dalenberg to counsel for the Department and copying Plaintiffs' additional counsel.
Exhibit U:	Emails dated November 15, 2017 10:32 AM, November 15, 2017 10:30 AM, and November 14, 2017 3:27 PM between Plaintiffs' counsel and counsel for the Department regarding potential agreement to negotiate an implementation plan for investigators' caseloads for Court approval.
Exhibit V:	November 15, 2017 11:39 AM email from Dalenberg to DCFS' counsel and copying additional counsel for Plaintiffs.
Exhibit W:	November 17, 2017 letter from B. Greenspan to Plaintiffs' counsel.

- 4. In a telephone call on Monday, June 12, 2017, which included the Department's counsel, DCFS employee Mike Ruppe, and Plaintiffs' counsel, Plaintiffs' counsel were informed that the Department at that time had between 60 and 70 interns performing investigations. Plaintiffs' counsel further were informed that the interns were individuals who did not meet all job qualifications for the position of investigator, but that the Department was not requiring that supervisors apply the Paragraph 26(a) limit to interns when assigning investigations to them.
- 5. Plaintiffs met with the Department on July 20, 2017, and Acting Director Walker attended that meeting. Acting Director Walker confirmed that in her view, the "averaging" approach to assessing compliance with Paragraph 26(a) was not sound. In addition, at that meeting, Plaintiffs were provided with a sample form of report for Investigator assignments that tallied assignments made in violation of the B.H. limits.
- 6. In a telephone call on November 8, 2017 between Plaintiffs' counsel and counsel for the Department, Plaintiffs' counsel asked the Department to make a commitment, in writing,

to develop an implementation plan for submission to the Court in order to address what Plaintiffs viewed as the Department's ongoing violation of Paragraph 26(a) of the Decree. The parties later agreed that by November 14, 2017, the Department at the least would give a *date* by which it would say *whether* it would make such a commitment.

- 7. The spreadsheet provided herewith as Exhibit X is a modified version of the 72-hour assignment report of investigators' caseloads previously provided by the Department on November 7, 2017. As provided by the Department, the lines highlighted in yellow identified interns serving as investigators. The modifications that I made and or directly and personally supervised are: (i) the spreadsheet was modified so that columns showing "team" assignments are hidden, and only the column with "total" assignments for each individual worker are visible; (ii) a column was added at the far right to identify whether the worker had received assignments in excess of the Decree's limits *just* in the timeframe from June 1, 2017 to October 31, 2017, with "Y" indicating "Yes" and "N" indicating "No"; and (iii) another column was added on the far right and was populated with Plaintiffs' calculation of the total number of investigations assigned to each worker (if any) in excess of the Decree's limits *just* in the timeframe from June 1, 2017 to October 31, 2017.
- 8. For the calculations provided in the final column on Exhibit X, Plaintiffs counted every assignment in excess of 15 made in a given month was counted as a violation. In addition, once a worker had received case assignments in excess of 12 for three months, every assignment over 12 for any *subsequent* month was counted as a violation. However, no assignments were double-counted when applying the above standards. As an example, if a caseworker received 16 assignments in June, in July, in August, and again in September, the violation tally would be: 1

(June / one more than 15) + 1 (July / one more than 15) + 1 (August / one more than 15) + 4 (September / four more than 12) = 7 assignments in violation of the Decree for that worker.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated 12/7, 2017

By: Xeich Calenberg

Heidi Dalenberg

4843-3543-3815, v. 1

Exhibit A

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 53 of 179 PageID #:3530

Heidi Dalenberg

From:

Heidi Dalenberg

Sent:

Thursday, May 11, 2017 9:13 AM

To:

lise.spacapan@illinois.gov; Beth Solomon (Beth.Solomon@illinois.gov); Barbara

Greenspan (Barbara.Greenspan@illinois.gov)

Cc:

Claire Stewart; Charles Peters (cpeters@schiffhardin.com); Ben Wolf

Subject:

BH

Importance:

High

Counsel – We need to meet for a full explanation regarding investigative caseloads and "operation blue star." The meeting should include DCFS employees with knowledge about when, how, and why the 14-day targets were set, as well as up-to-date reports on investigative caseloads. Please provide times on Monday, Tuesday, or Wednesday of next week.

We also need a response from you regarding the managed care RFP and the questions we have raised, and the assertion that you are unable to discuss those issues with us. We believe that the discussions are permissible given the protective order in effect for BH and our role as BH counsel. If you disagree please let us know without further delay, as we will seek relief from Judge Alonso on that issue.

Heidi Dalenberg
Riley Safer Holmes & Cancila LLP
Three First National Plaza
70 W. Madison Street, Suite 2900
Chicago, Illinois 60602
(312) 471-8730
hdalenberg@rshc-law.com
www.rshc-law.com



Exhibit B

Heidi Dalenberg

From: Solomon, Beth <Beth.Solomon@illinois.gov>

Sent: Monday, June 5, 2017 2:35 PM

To: Spacapan, Lise; Greenspan, Barbara; Ben Wolf; Heidi Dalenberg; Claire Stewart

Subject: Average Assignments-FY17

Attachments: Average Assigned-Caseloads FY17 to date.docx

Beth I. Solomon
Senior Litigation Counsel
DCFS Office of Legal Services
160 North La Salle Street, 6th Floor
Chicago, Illinois 60601
(312) 814-2481 (direct)
(312) 814-2401 (main)
Beth.Solomon@illinois.gov

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Average Assigned/Caseloads Fiscal Year 2017

July 2016-March 2017

Cook

	Average Assigned	Average Caseload
March 2017	11.7	17.8
February 2017	11.0	18.5
January 2017	10.7	17.6
December 2016	10.3	17.3
November 2016	10.4	18.4
October 2016	9.4	16.2
September 2016	9.5	15.4
August 2016	8.1	14.2
July 2016	7.4	16.6
Total	9.8	16.9

Northern

	Average Assigned	Average Caseload
March 2017	11.9	18.5
February 2017	11.7	19.8
January 2017	11.0	17.8
December 2016	9.3	17.2
November 2016	10.7	19.4
October 2016	9.9	17.1
September 2016	10.0	17.9
August 2016	9.7	19.3
July 2016	7.6	20.1
Total	10.2	18.6

Central

	Average Assigned	Average Caseload		
March 2017	12.3	17.		
February 2017	10.4	16.3		
January 2017	11.0	15.5		
December 2016	9.4	14.7		

November 2016	9.7	15.8
October 2016	9.7	14.6
September 2016	10.8	14.3
August 2016	10.9	14.1
July 2016	9.1	14.4
Total	10.4	15.3

Southern

	Average Assigned	Average Caseload
March 2017	10.9	13.8
February 2017	9.6	14.1
January 2017	9.7	13.4
December 2016	8.3	13.1
November 2016	9.3	14.4
October 2016	10.5	15.8
September 2016	11.1	15.7
August 2016	11.9	15.3
July 2016	8.8	13.9
Total	10.0	14.4

Statewide

	Average Assigned	Average Caseload
July 2016 to March 2017	10.1	16.3

Exhibit C

TS-Norman Street

Heidi Dalenberg 312-471-8730 hdalenberg@rshc-law.com

June 7, 2017

VIA EMAIL

Barbara L. Greenspan Assistant Attorney General Chief, Child Welfare Litigation Bureau 100 W. Randolph, Suite 11-200 Chicago, Illinois 60601

Re: BH v. Sheldon

Dear Barb:

As you are aware, Plaintiffs have deep concerns regarding the "front end" investigative / intact family portion of the child welfare system in Illinois. This concern arises in part because of the recent news reports regarding inadequate investigations that led to the deaths of four children known to the Department. But those reports are not the sole cause of our concern. The most recent report issued by the Children and Family Research Center continues to show a highly worrisome increase in the incidence of re-abuse and neglect of children, both on the investigative / intact side and for children in placement. This suggests a problem in the quality of investigative work.

Further, we are aware that there are open postings for investigator positions that the Department has struggled to fill, and that retention continues to be a problem with new hires. Reports we receive from numerous sources also strongly suggest that the Department is *not* in compliance with the caseload limits for investigators under the B.H. Consent Decree. The caseload reports that you forwarded to us on June 5, 2017 do not demonstrate compliance. Those summary reports provide "average" case assignments statewide and by Region. That data is neither informative or sufficient to answer the question of compliance.

The Decree sets caseload limits by individual worker. Under Paragraph 25 of the Decree, an investigator is to receive no more than 12 new assignments in nine months out of the year. In the remaining three months, the worker may receive no more than 15 assignments per month. And the Decree further provides that no intact family caseworker may have a caseload in excess of 20. See id. at § 26. The limits were set in this manner because children are not safe, and investigations cannot properly be completed, if there is a significant imbalance in actual assignments by worker.

Thus, the question is not whether things "average out" across all workers in an office, much less across a region or across the state. The question is whether there are repeated instances of individual workers having excessive assignments and/or caseloads, while others handle fewer cases or investigations due to illness, leave, vacation, or simple underperformance.

Barbara L. Greenspan June 7, 2017 Page 2

The Department has requested a meeting to discuss its performance in investigations and intact family cases. Plaintiffs have agreed to meet, and the meeting should be set in the next week or two. As a starting point, Plaintiffs request that the Department provide data that should help inform the parties' discussion. If any of this information cannot readily be provided, we ask that the Department immediately contact us to discuss what data can be obtained quickly and most closely approximates what Plaintiffs are requesting:

- For the last two years, data by month that shows (i) the number of investigator positions already filled as of the start of the month; (ii) the open job postings for investigators (by office and region); (iii) the number of individuals hired as investigators in that month, and (iv) the number of investigators who left the position (e.g., those who quit, transferred, were terminated, or the like).
- For the last two years, data by month that shows by office and by region (i) the total number of investigators employed; and (ii) the number of months in which any individual worker was assigned more than 15 cases in a month.
- For the last two years, data for each office showing by worker the number of case assignments received each month. The reports should group workers by office.
- For the last two years, data that shows by office and by region (i) the total number of investigators employed; and (ii) the number of months in which any individual worker was assigned more than 12 cases in the nine months with the lowest case assignments for that worker.²
- Data sufficient to show whether the rate of "unfounded" cases rose during the time in which any DCFS office (or region, if a program was region-wide) was employing "incentives" for workers to close cases more rapidly. This would include the "Blue Star" initiative in Cook and the "contest" in Joliet. Please check with Mark Testa regarding the appropriate comparison group for this data.
- Data sufficient to show whether there has been an uptick in the number of cases involving reports of re-abuse or neglect in the locations that employed "incentives" for workers to close cases more rapidly.

¹ For a specific investigator, one would determine the case assignments s/he received over a year, by month. If there were four months in which the investigator was assigned more than 15 cases, the count would be 4 for that individual.

² For a specific investigator, one would determine the case assignments s/he received over a year, by month. The three months with the highest number of assignments would be disregarded. Reviewing the remaining nine months, if more than 12 assignments were made in 3 of those months, the count for that worker would be 3 for that individual.

Barbara L. Greenspan June 7, 2017 Page 3

- The results of the case-closing evaluation that was performed for the cases handled in locations where any case-closing "incentives" were offered.
- A copy of the instruction(s) issued to the field that reportedly directed the cessation of all such case-closing incentives.
- Data showing the use of interns to conduct investigations the data should identify the intern, the office where the intern worked, and the case assignments the intern received each month.

Please call me if you have any questions regarding the above request. Plaintiffs look forward to discussing these issues with the Department.

Very truly yours,

Weid Dalenberg
Heidi Dalenberg

HD/zh

cc:

Lise Spacapan Beth Solomon Claire Stewart Ben Wolf

Exhibit D

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 63 of 179 PageID #:3540

Heidi Dalenberg

From:

Heidi Dalenberg

Sent:

Monday, June 12, 2017 1:18 PM

To:

lise.spacapan@illinois.gov; Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth

Solomon (Beth.Solomon@illinois.gov)

Cc:

Claire Stewart; Ben Wolf; Charles Peters (cpeters@schiffhardin.com); Marci White; Mark

Testa

Subject:

Assignment of Investigations to "Interns"

Importance:

High

Counsel – In our call with Mr. Ruppe this morning, it was disclosed that the Department is using "interns" (individuals who do not have the credentials necessary for the position of "investigator") to perform investigations, and that the Department has not instructed supervisors that the caseload limit in Paragraph 26(a) of the Decree applies to those interns. Rather, the Department has left supervisors free to assign higher caseloads to those interns.

Plaintiffs view the above as a direct, dangerous, and flagrant violation of the Decree. As an initial step to address this problem, Plaintiffs ask that an instruction be given *immediately*, statewide, that the case assignment cap applies to interns. If we do not receive confirmation by 5:00 pm tomorrow that this instruction has been given, we will seek relief from the Court.

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Exhibit E

Heidi Dalenberg

From: Solomon, Beth <Beth.Solomon@illinois.gov>

Sent: Monday, June 12, 2017 5:15 PM

To: Greenspan, Barbara; Ben Wolf; 'Claire Stewart'; Testa, Mark F; Marci White; Heidi

Dalenberg

Cc: Spacapan, Lise

Subject: B.H. v. Sheldon - Caseload Stats for BH Purposes

Attachments: DA-314 Item 1 1911 Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1

CAC Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Damen Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Deerfield Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 East St Louis Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Emerald Field Office_First Worker Primary

Assignment.xlsx; DA-314 Item 1 Harvey Field Office_First Worker Primary

Assignment.xlsx; DA-314 Item 1 Joliet Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Maywood Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Peoria Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 Wood River Field Office_First Worker Primary Assignment.xlsx; DA-314 Item 1 1911 Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 CAC Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Damen Field Office_ New or

Transfer Primary Assignment.xlsx; DA-314 Item 1 Deerfield Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 East St Louis Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Emerald Field Office_ New or Transfer Primary

Assignment.xlsx; DA-314 Item 1 Harvey Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Joliet Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Maywood Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Peoria Field Office_ New or Transfer Primary Assignment.xlsx; DA-314 Item 1 Wood River Field Office_ New or Transfer Primary

Assignment.xlsx

Follow Up Flag: Flag Status: Follow up Flagged

Attached please find caseload reports for various field offices. Please make sure to look at the tabs on the bottom of each report as there are tabs for FY16 and FY 17.

Beth I. Solomon
Senior Litigation Counsel
DCFS Office of Legal Services
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JULY 2016

Assignments: The worker is the first worker to have a primary assignment > 24 hours for the investigation.

					BH	BH	BH					
one cur		Supervisor Name ID WKR	Worker Name	Assignments	Compliance 12 and Under		Compliance Over 15	Completed	Pending	Indicated Rate	Unfounded Rate	SOR
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13370 07 37	COOK OF IMPURSITY SOLVERS GILLS											
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1085 680149	Child Protection / Cook North / Investigations Te	TI 1000 1000		10	Y	N	N	20	26	10.00	90.00	
1085 680149	Child Protection / Cook North / Investigations Te			9	Y	N	N	8	4	0.00	100.00	
1085 680149	Child Protection / Cook North / Investigations Te			5	Y	N	N	34	5	23.53	76.47	
1085 680149	Child Protection / Cook North / Investigations Te			16	N	Υ	Y	17	31	11.76	88.24	
1125 680270	Child Protection / Cook North / Investigations Te	ir 16455107	,	7	Υ	N	N	4	14	0.00	100.00	
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1127 680355	Child Protection / Cook North / Investigations Te	1575387)		Y (N	N	0	0	0.00	0.00	
1127 6B0355	Child Protection / Cook North / Investigations Te	4269880 4269880)		Υ (N	N	5	5	20.00	80.00	
1127 6B0355	Child Protection / Cook North / Investigations Te	ar 426899	5	- 1		- 3	-	-			-	
1127 680355	Child Protection / Cook North / Investigations Te	ar 1423283.	2		Y (N	N	26	3	11.54	88.46	
1127 680355	Child Protection / Cook North / Investigations Te	ar 426936.	2) Y	N	N	5	6	20.00	80.00	
1127 680355	Child Protection / Cook North / Investigations Te	ar 1147839	1	1 3		-	-	-				
1127 680355	Child Protection / Cook North / Investigations Te	ar 1639975	В		3 Y	N	N	13	8	15.38	84.62	
15697 680476	Child Protection / Cook North / Investigations Te	ar 1661727	7	1	γ (N	N	0	0	0.00		
15697 6B0476	Child Protection / Cook North / Investigations Te	ar 1485101	3	3) Y	N	N	0	0	36.150		
15697 680476	Child Protection / Cook North / Investigations To	ar 445183	9	1 3) Y	N	N	0				
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1062 680541	Child Protection / Cook North / Investigations To			10		Y	Y	18	11			
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1062 680541	Child Protection / Cook North / Investigations Te		27		4 Y	N	N	21	24			
1062 680541	Child Protection / Cook North / Investigations To) Y	N	N	3	1			
1062 6B0541	Child Protection / Cook North / Investigations Te) Y	N	N	6	6			
1062 680541	Child Protection / Cook North / Investigations To			1		Y	N	10				
1062 680541	Child Protection / Cook North / Investigations To			1	2 Y	N	N	30	23	36.67	63.33	
1062 680541	Child Protection / Cook North / Investigations To	500000000000000000000000000000000000000		1 2		3773	-			W	-	
1062 680541	Child Protection / Cook North / Investigations To	ar 426954	2		0 Y	N	N	8	4	25.00	75.00	

Exhibit F

Heidi Dalenberg

From: Solomon, Beth <Beth.Solomon@illinois.gov>

Sent: Tuesday, June 13, 2017 4:01 PM

To: Ben Wolf; 'Claire Stewart'; Marci White; Testa, Mark F; Heidi Dalenberg; Charles Peters

(cpeters@schiffhardin.com)

Cc: Spacapan, Lise; Greenspan, Barbara

Subject: B.H. v. Sheldon

Attachments: Child and Family Service Intern Case Assignment memo 6-13-17.pdf

Heidi: Attached please find a memo from Senior Deputy Director Michael Ruppe issued to his staff this afternoon regarding investigations assigned to Child and Family Interns in the Division of Child Protection.

By way of background, DCFS has not hired a Child and Family Intern since October 2016 and has no plans to do so under current circumstances. At this time, there are 34 Child and Family Interns assigned to the Division of Child Protection.

DCFS began hiring individuals into Child and Family Intern positions in June 2014 due to a lack of candidates on the Open/Competitive Eligibility Lists in particular offices. Individuals considered for intern positions were generally applicants who met the educational requirements for the Child Protective Specialist position, but did not possess the required years of experience. In some instances individuals would meet the educational and experience requirements for a Child Protective Specialist position but due to the long delays in the grading process at CMS, DCFS brought the individual on as an Intern. Those individuals would later receive a grade from CMS and would appear on the Open/Competitive List and DCFS would be able to bring that individual directly into the Child Protective Specialist in accordance with the regular hiring process. At the current time, with the recent expansion of the degree requirements to criminal justice and law enforcement degrees for the Child Protective Specialist positions and an increased number of candidates available on the Open/Competitive Lists from CMS, DCFS also does not intend to hire any additional Child & Family Interns.

As you are aware, Paragraph 68(d) of the Restated Consent Decree provides that "in the event that the plaintiffs assert that the Department is or is likely to be out of compliance with any of the terms of the Decree, . . . they shall so notify the Department. Following receipt of such notice, the parties shall meet in an attempt to reach an agreement on the extent, if any of non-compliance, or likely non-compliance and to prepare a plan for achieve compliance." In the spirit of Paragraph 68(d), DCFS is gathering caseload information on Child and Family Interns assigned to the Division of Child Protection and we look forward to meeting to address plaintiffs' counsel's concerns regarding this issue.

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Bruce Rauner Governor George H. Sheldon Director

Inter-Office Memorandum

TO: Regional Administrators, Assistant Regional Administrators, Area Administrators and Child

Protection/Child Welfare Public Service Administrators

FROM: Michael Ruppe, Senior Deputy Director

DATE: June 13, 2017

SUBJECT: Child and Family Service Intern investigation assignment

Effective immediately, June 13, 2017, DCFS supervisors must adhere to the assignment limitations set forth in the B.H. Consent Decree for Child and Family Service Intern. When a Child and Family intern is assigned to the Division of Child Protection, the Child and Family Intern "will be assigned no more than 12 new abuse or neglect investigations per month during 9 months of a calendar year, during the other 3 months of the calendar year the investigator will be assigned no more than 15 new abuse and neglect investigations per month. Neither the 9 months nor the 3 months need occur consecutively."

Each supervisor who is responsible for a Child and Family Intern is expected to track the investigations assigned on a weekly basis, and generate a monthly tracking report. The report of assignments must be submitted to the Area Administrator, Assistant Regional Administrator, and Regional Administrator by the 5th working day of each month for the prior month. The Regional Administrator is responsible for sending one summary report to the Operations Deputies and the Senior Deputy Director by the 10th working day of each month for the prior month. The first set of reports will be due July 10th and July 17th as outlined above.

Thank you.

cc: Nora Harms-Pavelski Diane Cottrell Lise Spacapan Laura Roche Beth Solomon

Exhibit G

Heidi Dalenberg

From: Heidi Dalenberg

Sent: Wednesday, June 14, 2017 10:56 AM

To: lise.spacapan@illinois.gov; Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth

Solomon (Beth.Solomon@illinois.gov)

Cc: Claire Stewart; Charles Peters (cpeters@schiffhardin.com); Marci White; Mark Testa

Subject: Investigative Caseloads - Paragraph 68(d) Notification

Barb – we have done a quick initial review of the data Beth forwarded regarding investigators' caseloads. This will formally provide the Department with notice under Paragraph 68(d) of the Decree that the Department is in substantial violation of Paragraph 26(a) of the Decree. We want to meet promptly (sometime next week at the latest) to discuss how the Department must address this substantial non-compliance. Please provide us with times when appropriate representatives from the Department who have authority to negotiate and make commitments on behalf of the Department can be available.

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Exhibit H

Heidi Dalenberg

From: Greenspan, Barbara <Barbara.Greenspan@illinois.gov>

Sent: Monday, June 26, 2017 5:02 PM

To: Heidi Dalenberg; Claire Stewart; Ben Wolf; Mark Testa; Marci White; Mark Testa

Cc: Spacapan, Lise; Solomon, Beth Subject: BH - Investigative Caseloads

Attachments: Newly Assigned First Worker CY16 By Workes.xls; Newly Assigned First Worker CY17

January to Endxls

Follow Up Flag: Follow up Flag Status: Flagged

All,

Attached please find a report on caseloads by individual worker for calendar year 2016 and calendar year 2017 through May. We will continue to provide you with information.

Barb

Barbara L. Greenspan Assistant Attorney General Chief, Child Welfare Litigation Bureau 100 W. Randolph, Suite 11-200 Chicago, Illinois 60601

Phone: 312/814-7087; Fax: 312/814-6885

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Exhibit I

Heidi Dalenberg

From: Heidi Dalenberg

Sent: Friday, June 30, 2017 3:15 PM

To: Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth Solomon

(Beth.Solomon@illinois.gov); lise.spacapan@illinois.gov

Cc: Claire Stewart; Barbara Greenspan (Barbara Greenspan@illinois.gov); Beth Solomon

(Beth.Solomon@illinois.gov); Mark Testa; Marci White

Subject: BH - Outstanding Data Request 2017-06-07 LT Greenspan.pdf

Barb and Beth – As discussed again on Tuesday of this week, we still have not received much of the information requested in the attached letter dated June 7, 2017. Some of that data was requested as early as May 19. The missing information is critical to the parties' ongoing discussions addressing the Department's ongoing non-compliance with the caseload limits for investigative caseworkers and strategies to address that non-compliance.

Plaintiffs are entitled to this information, and the Department previously promised to provide it. For each category of information that has not yet been given, please provide **both** (i) a written explanation of the reason for the Department's failure to respond; and (ii) the date when the material will be provided.

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Exhibit J



Heidi Dalenberg 312-471-8730 hdalenberg@rshc-law.com

July 7, 2017

VIA EMAIL

Barbara L. Greenspan Assistant Attorncy General Chief, Child Welfare Litigation Bureau 100 W. Randolph, Suite 11-200 Chicago, Illinois 60601

Re: B.H. v. Walker

Dear Barb:

We met with you and representatives of the Department on Wednesday, June 27, 2017 to discuss the Department's ongoing violation of the caseload limits for investigators as set forth in \$\ 26\$ of the B.H. Decree. During that meeting, the Department conceded the question of noncompliance. Plaintiffs asked the Department to provide a written description of all actions it is taking to address this situation (including without limitation the extent to which temporary assignments are being made, retirees are being recalled, hiring activities, and the like). The Department agreed to provide that information but has not done so. Please provide the written description no later than July 11, 2017. We presume that this deadline will not present any difficulty as the Department is merely being asked to describe what it says it already is doing.

Plaintiffs have also asked the Department to enter into negotiations for an implementation plan to address the Department's chronic failure to comply with the caseload limits set in ¶26 of the Decree. The Department has not agreed to such negotiation, but at the same time, the Department has not identified how it will achieve and maintain compliance with the caseload limits or provided a timeline therefor. Given that the emergency measures the Department previously has used in prior instances of acute non-compliance have resulted only in partial and temporary relief at best, a formal plan for reform is required. Unless the Department makes a firm commitment by July 11, 2017, to negotiate an appropriate implementation plan, Plaintiffs will seek relief before Judge Alonso.

Plaintiffs also previously asked for a date to meet with Acting Director Walker. We would appreciate receiving proposed dates for such a meeting. We also ask that you provide confirmation in writing by July 11, 2017, that there is no change in respect to the representations made to Judge Alonso on June 20, 2017 that (i) the current Implementation Plan is "legal binding authority" that the Department fully intends to honor; (ii) the Department "welcomes" the participation of the Court-appointed experts in the current implementation initiatives and their request for additional staff; (iii) the Department will involve Plaintiffs' counsel and the experts in

Barbara L. Greenspan July 7, 2017 Page 2

future discussions regarding the managed care RFP and contract negotiations; and (iv) that services provided by Mindshare will be continued until the Court tells the Department that it can bring those functions in-house.

With the Legislature's override of the Governor's veto, Plaintiffs also request a written statement from the Department explaining how the needs of children in care will be met, as required by the BH Decree, under the FY 2018 Budget. We ask that this statement be provided by July 28, 2017. We would like a meeting thereafter (preferably with the Director) to discuss that issue.

Finally, Plaintiffs ask again for the data previously requested in our correspondence of June 7, 2017 and/or May 19, 2017. The data that the Department has not yet provided includes:

- For the last two years, data by month that shows the open job postings for investigators (by office and region);
- For the last two years, data by month that shows investigator positions vacated (by office and region) due to terminations, transfers, or the like;
- Data for the last two years identifying "interns" used to perform investigations and the number of investigations assigned to each such person each month;
- Data sufficient to show whether the rate of "unfounded" cases and/or increased reports of re-abuse or neglect rose during the time in which any DCFS office was employing "incentives" for workers to close cases more quickly (including without limitation the "Blue Star" initiative in Cook and the "contest" in Joliet);
- The results of the case-closing evaluation that was performed for investigations handled in locations where any "incentives" for case closings were offered; and
- The instruction(s) issued to the field directing that all case-closing "incentives" should immediately be stopped.

We look forward to your prompt response regarding the above.

Very truly yours.

Heidi Dalenberg

cc: Ben Wolf Claire Stewart

Charles Peters

Exhibit K



Bruce Rauner Governor Beverly J. Walker Acting Director

VIA E-MAIL July 14, 2017

Heidi Dalenberg Riley, Safer, Holmes & Cancila 70 West Madison Street Suite 2900 Chicago, Illinois 60602

Re:

B.H. v. Walker

88 C 5599

Dear Heidi:

This letter is in response to your correspondence and data requests from June 7, 2017 and July 7, 2017 regarding caseloads for child protection specialists ("CPS"). As the Department discussed with you during meetings on May 19, 2017 and June 27, 2017, we are taking a number of steps to address child protection staffing and caseloads. This letter provides further details about those steps, and highlights some additional steps that we are considering for future implementation. In addition, this letter describes the documents that we previously provided in response to your requests. We look forward to further discussion about these matters. We are available the afternoon of Thursday July 20, 2017.

First, the Department is committed to remediating the high caseloads that seem to occur with frequency in certain "hot spots" throughout the state. As we discussed with you, these hot spots include the offices in Rockford, Waukegan, Elgin, Aurora, Peoria, Bloomington and Urbana where the Department perennially has difficulty recruiting and retaining CPS staff in sufficient numbers. In addition, although they may not be "hot spots' at the moment, we also are looking at creative ways to keep caseloads down in Joliet and Springfield.

To assist in looking at caseloads, we prepared a report, attached as Exhibit A, that reflects the CPS in each office who received 10% over the maximum B.H. caseload assignments during the first five months of this year. Statewide, approximately 100 CPS were assigned 76 or more cases during the first five months of 2017. It is important to note that given the timeframes, this analysis does not take into account that cases tend to drop significantly in the summer when school is out, or that some of these CPS were transferred cases that were opened by another worker. This analysis supports that "hot spot" identification listed above.

Certain steps that are in process are described below, and some further steps are being explored and considered.

Streamlining of Hiring Process for Child Protection Vacancies

To streamline the hiring process for CPS, the Department maintains a continuous posting for CPS positions in the following offices: Waukegan, Rockford, Elgin, Urbana, Mt. Vernon, Peoria, Bloomington, Charleston, Galesburg, Springfield, Danville, Rock Island, Marion, Harrisburg, Freeport and Cook. Normally, postings are active for only 10 days; therefore, this approach allows us to advertise a vacancy continuously. These continuance postings are relevant to people who are not currently in DCFS—they are visible to people outside DCFS. Separately, with respect to internal postings that are available only to current DCFS employees, the Department worked with the union to reach agreements on five-day (as opposed to ten-day) postings and backfilling of positions that are vacant due to a worker who internally moved within DCFS.

The Department established a protocol through which CPS vacancies are posted as soon as they are identified, and we no longer wait for the Committee Approval process that was previously in place between the Office of Employee Services and the Office of Budget and Finance.

As we discussed with you last year, in 2016, Central Management Services (CMS) was far behind in grading candidates which dramatically slowed the hiring process. This problem was alleviated and CMS is virtually current on grading applications, thus expediting the hiring process. The Department will continue to monitor this grading and will attempt to address any delays should they arise in the future.

As we also discussed last year, the Department implemented a process to temporarily assign (TA) employees who were previously certified as CPS but now work in other positions within the Department. That TA project ran during the summer of 2016 and helped reduce average caseloads.

Agreement for Pool Concept for Child Protection Investigators in Cook County

The Department reached an agreement with the union for the creation of a pool of Deferred Assignment Investigators for Cook County offices to address staffing and caseloads. This agreement, attached as Exhibit B, allows the Department to hire an additional 18 CPS for Cook County even though these vacancies do not currently exist. These Deferred Assignment Investigators will start employment no later than August 14, 2017. The CPS will be sent immediately to Foundations training, which lasts for six weeks. As vacancies reach the status of going to external candidates, these pool candidates will be assigned to specific vacancies. If the Department gets to the point where these vacancies are filled, the Deferred Assignment Investigators will then be assigned to various offices to handle overflow cases or various assignments from the local teams until such time a vacancy exists for permanent placement.

In the Deerfield, Maywood and Emerald offices, there will be pools of six Deferred Assignment Investigators. The Deferred Assignment Investigators will report directly to the Cook County Area Administrators who will assign the Deferred Assignment Investigators to a supervisor for assignments and day-to-day supervision.

The pool concept is being implemented in Cook County. The pool is most workable in Cook County because it includes a number of different offices all located in one county which corresponds to the hiring criteria for filling vacancies with external candidates from an

Open/Competitive Eligibility List. Downstate offices in the other regions of the state are limited to one field office per county, with the exception of St. Clair County which covers East St. Louis and Belleville field offices, Madison County which covers Alton, Wood River and Granite City field office and Kane County which covers Elgin and Aurora field offices.

Activities to Address Caseloads Downstate, Including Meeting with Union to Discuss "Overstaffing"

Although the pool concept is complicated in downstate regions due to the number of downstate locals and geographic restrictions, we still plan to continue analyzing options. At the moment, the Southern region has been most fully staffed and the Department has detailed some CPS to the Northern region. For example, Southern CPS teams went to Joliet last year. This month, Southern staff have been detailed to Glen Ellyn; allowing Glen Ellyn staff to be detailed to Waukegan. The Department has recently sent details from Southern to Urbana.

The Department is exploring options to overstaff in the other field offices where there is a pattern of frequent turnover of staff and resulting caseload issues. The Department is meeting with the union on July 21, 2017 to discuss creative options to address the staffing issues in Rockford, Waukegan, Elgin, Aurora, Peoria, Bloomington and Urbana. Also, although they are not necessarily current "hot spots" the Department has historically had some caseload issues in Springfield and Joliet and we plan to take the same approach to overstaffing in those offices.

Other regions developed approaches to address staffing and caseloads in various offices. For example, investigative staff (with the exception of Southern region) who are transferring to other positions are given start dates 60 days out to allow them to complete pending cases. They also may be detailed back to the CPS position for a period to take new case assignments if necessary. In Urbana and Peoria, CPS who have fewer than 20 pending cases may be authorized to work up to 20 hours of overtime per month to assist peers in completing cases. In the Northern region, the Department has assigned Boone County intake to the DeKalb office to assist the Rockford field office. In addition, western towns in Winnebago County as well Machesney Park, a city in Winnebago County, have been assigned to the Freeport office for investigation coverage. The Department faced an unfair labor challenge to these changes, but the outcome through mediation was favorable as described above.

Various overtime and temporary assignment projects are used in the Northern region, including the temporary assignment of child protection supervisors to investigator positions for 60 days.

The Department will be discussing with the union the prospect of overstaffing offices in areas adjacent to those locations where staffing continues to be a challenge and using the additional staff to assist with or handle cases in those offices experiencing staffing issues.

Other Actions the Department is Considering Taking to Address Caseloads

In addition to the efforts being taken and described above, the Department is reviewing other options to address caseloads.

In the past, the Department has hired Child and Family Services Interns to fill positions. As we explained during previous meetings with you, Child and Family Service Interns are individuals who meet the educational requirements for a CPS position, but do not have the required years of child welfare work experience. Some of these candidates are experienced in areas such as law enforcement, for example, but do not have the required two years of child welfare work experience. As a result of our recent discussion with you, a memo was sent by Michael Ruppe instructing staff that interns may not be assigned caseloads over B.H. requirements. We are currently manually monitoring the caseload assignments of all interns.

The Department may consider hiring Child and Family Services Intern positions in certain offices where there continue to be high caseloads and lack of candidates to fill those positions. These offices include Bloomington, Charleston, Peoria, Rock Island and Urbana in the Central region and Freeport, Rockford, Elgin, Waukegan and Kankakee in the Northern region. Several months ago, the Department developed a work group to address issues relating to the training and case assignment of Child and Family Interns. The work group developed a draft protocol which is currently being reviewed by senior management. The draft protocol provides guidelines for the assignment of cases with specific allegations and specific training requirements for Child and Family Service Interns after they have completed Foundations Training on a weekly schedule. The draft protocol also provides for the assignment of a mentor, who is an experienced investigator, to assist the intern in both field and office training on investigation practices.

The Department currently has 96 Children & Family Services Intern applications and has determined that 54 candidates are still interested in the Child and Family Services Intern positions. Once a decision has been made regarding Child and Family Service Interns, the Department can commence the interview process. The Department remains committed to ensuring that Child and Family Interns receive caseloads in conformance with the provisions of the B.H. Consent Decree.

The Department will also be proactively working on a number of other issues on multiple fronts to continue to streamline the hiring process. For example, the Department is considering working with CMS to determine the feasibility of adding an applicant's email address to the Open/Competitive List in an effort to simply the process for scheduling interviews. At the current time, the Department mails interview letters to prospective candidates and the prospective candidate has five days to respond, which allows for time for mailing. The Department hopes that permitting email notification would permit quicker responses to the Department's request for interviews.

We also discussed these caseload matters with you last year on April 28, 2016. It is the Department's position that it has been in "substantial compliance" with the B.H. caseload provisions for CPS since that time. As reflected in Exhibit C, attached, Senior Deputy Operations Michael Ruppe prepared documents analyzing caseloads prior to his appearance at the House Human Services hearing on May 23, 2017. These documents reflect that on a regional basis, CPS new case assignments averaged as follows in March 2017: Cook 11.7; Northern 11.9; Central 12.3; Southern 10.9. In Exhibit D, attached, Deputy Ruppe looked at a field office level at the average caseloads assigned during April 2017. These also generally show compliance with B.H. numbers.

However, the Department recognizes that these caseload averages appear to be creeping up. Further, we recognize that the regional average is skewed by the fact that CPS join and leave the Department throughout any timeframe that is analyzed. For example, there may be CPS who have low "average" case assignments because they were either hired during the evaluation period, or left for a different position during the period. The data is further confounded by the fact that some CPS are assigned to cases that were transferred from other CPS who previously conducted part of the investigation on the transferred cases. This has the effect of skewing the data in the opposite direction. In addition, in Peoria, Quincy and Bloomington, there is one CPS position designated a "floater" who travels where needed. These "floater" CPS move from area to area as needed and their assignments are not consistent with other CPS and may be higher.

Document Request

The Department also wanted to address your prior requests for documents from June 7, 2017 and identify those documents which have already been provided to you.

In specific response to your request, the Department has provided the following documents:

- A spreadsheet detailing the number of CPS positions filled and the number of CPS
 positions that the Department is working to fill on a monthly basis from January 2016
 through June 2017. This list is organized by both region and office;
- Data setting forth by individual CPS newly assigned investigations per month for calendar year 2016 and for January through May 2017;
- Data for specific offices in which there was an "incentive" program regarding
 investigations setting forth by CPS newly assigned cases, indicated rate, unfounded rate
 and subsequent oral reports. This data was provided by month for the time period July
 2016 through May 2017;
- Case closing evaluations for offices in Cook County and Joliet where there was an "incentive" program regarding investigations;
- The May 31, 2017 memorandum from Senior Deputy Michael Ruppe to staff terminating any "incentive" program;
- Data on Child and Family Service Interns setting forth newly assigned cases by month and by individual intern from 2015.

Attached to this letter is some of the additional data you requested, including, attached as Exhibit E, which contains a list of CPS staff detailing separations and transfers from January 2016 through June 30, 2017. The information provided with this letter required a manual review and compilation of the data.

The information that remains outstanding from your request includes the case evaluations from the Southern and Central regions in those offices where there were "incentive programs" regarding investigations. The case evaluations from the Southern region were recently completed and the case evaluations from the Central region are currently ongoing and will be provided upon their completion.

You also requested all job postings from 2016 going forward. This data is not included in this transmission; it will require significant time to manually compile and we wish to discuss this with you further.

The Department continues to look forward to any suggestions you have regarding issues concerning caseloads and staffing for CPS staff and to our further discussions relating to this topic.

Spacapan/BIS

Very truly yours,

Lise T. Spacapan

DCFS General Counsel

Attach.

Cc: Barbara Greenspan, Chief, Child Welfare Litigation Bureau

Ben Wolf, ACLU of Illinois Claire Stewart, ACLU of Illinois

Beth Solomon, DCFS Senior Litigation Counsel

Marci White, Expert Panel member Mark Testa, Expert Panel Member

COOK COUNTY REGION

Calendar Year:

Assignments:

2017 (01/01/2017 - 05/31/2017)

The worker is the first worker to have a primary assignment > 24 hours for the investigation.

			January	February	March	April	May	Calendar
Worker Name	RSF	Office	Assignments	Assignments	Assignments	Assignments	Assignments	Assignments
	6C0476	1026 S Damen	17	13	16	15	14	78
	6C0544 & 6C0151	1026 S Damen	10	15	23	11	19	80
	6C0353	1240 S Damen	16	14	22		18	84
E	6C0353	1240 S Damen	17	16	21	15	20	89
	6B0541	1911 S Indiana	17	15	15	15	22	86
	6B0541	1911 S Indiana	18	17	2	17	24	78
	6A12 & 6B0105	Damen/Deerfield	16	18	16		20	87
	6B0119	Deerfield	17	18	16		19	84
	6B0106	Deerfield	14	16	16		15	76
	6B0104	Deerfield	15	17	11	13	20	78
	6B0119	Deerfield	15	18	17		18	80
	6B0104	Deerfield	14	19	13	13	21	82
	6D0229 & 6D0247	Emerald	20	15	17	17	18	89
	6D0231	Emerald	18	18	19	16	16	89
	6D0356	Emerald	21	17	20		18	93
	6D0231	Emerald	19	16	16	15	14	80
	6D0247 & 6D0177	Emerald	19	16	17	14	12	80
	6D0343 & 6C0544	Emerald/Damen	19	13	22	16	20	90
	6D0231 & 6D0571	Emerald/Harvey	15	16	17	12	16	77
	6D0662	Harvey	13	14	15	16	17	76
	6D0550 & 6D0405	Harvey	14	15	12	16	20	77
	6D0646	Harvey	13	12	16	19	17	79
	6D0432 & 6D0571	Harvey	14	16	18	11	16	79
	6D0662 & 6D0343	Harvey/Emerald	19	20	14	16	20	91
	6C0666	Maywood	13	14	19	15	21	84
	6C0601	Maywood	12	14	19	13	16	76
	6C0628	Maywood	10	13	18	15	18	76
	6C0666	Maywood	13	12	18	15	17	77
	6C0601	Maywood	14	15	16	15	19	82

CENTRAL REGION

Calendar Year: Assignments:

2017 (01/01/2017 - 05/31/2017)

The worker is the first worker to have a primary assignment > 24 hours for the investigation.

			January	February	March	April	May	<u>Calendar</u>
Worker Name	RSF	Office	Assignments	Assignments	Assignments	Assignments	Assignments	Assignments
	2002	Diii	40	15	44	10	47	
	3B82	Bloomington	16	16	14	19	17	83
	3B82	Bloomington	19	16	16		21	90
	3B82	Bloomington	14	16	14	15	19	78
	3B04	Charleston	17	15	19	15	18	84
	3B84	Charleston	18	14	24	15	15	88
	3B03	Danville	13	16	20	19	16	86
	3B83	Danville	11	15	17	17	16	77
	3B84	Decatur	14	15	18	16	17	82
	1B22	Galesburg	16	12	16	13	22	81
	1B30	Peoria	16	15	17	19	16	84
	1B12	Peoria	15	10	13	22	18	78
	1B42	Peoria	14	14	17	16	18	81
	3A20	Quincy	25	33	41	30	17	148
	3A04	Springfield	18	12	21	15	16	84
	3A94	Springfield	23	11	19	17	20	90
	3A94	Springfield	20	19	23	22	17	101
	3A94	Springfield	18	16	31	12	23	102
	3A96	Springfield	24	14	20	18	14	91
	3A96	Springfield	10	21	30	21	23	106
	3B44	Urbana	18	26	15	18	25	104
	3B87	Urbana	13	11	25	17	22	89
	3B87	Urbana	16	23	28	14	10	93
	3B88	Urbana	13	22	19	19	12	85
	3B88	Urbana	12	15	18	17	13	76

SOUTHERN REGION

Calendar Year:

2017 (01/01/2017 - 05/31/2017)

Assignments:

The worker is the first worker to have a primary assignment > 24 hours for the investigation.

			January	February	March	April	May	Calendar	
Worker Name	RSF	Office	Assignments	Assignments	Assignments	Assignments	Assignments	Assignments	
•	4A93	Belleville	15	14	18	10	21	80	

2017 (01/01/2017 - 05/31/2017)

The worker is the first worker to have a primary assignment > 24 hours for the investigation.

Worker Name	RSF	Office	January Assignments	February Assignments	March Assignments	April Assignments	May Assignments	Calendar Year Assignments
Traine Heine	2A45	Aurora	Assignments 14	Assignments 14	Assignments 17	Assignments 21	Assignments 22	
	1A16	DeKalb	21	17	18	13	17	
	1A16	DeKalb	15	19	18	16	12	
	2A11 & 2A66	Eigin/Aurora	14	15	19	11	23	
	2A12 & 2A13	Elgin/Aurora	15	18	16	23	14	87
	2A12 & 2A13	Elgin/Aurora	11	13	16	21	21	
	2A12 & 2A66	Elgin/Aurora	18	16	16	22	15	88
	2A13, 2A45 & 2A66	Elgin/Aurora	20	17	18	20	18	
	2A45 & 2A66	Elgin/Aurora	13	15	17	20	19	
	2A12 & 2A66	Elgin/Aurora	7	15	15	15	22	
	2A45 & 2A66	Elgin/Aurora	17	15	8	18	20	
	2A11 & 2A66	Elgin/Aurora	13	14	17	17	19	
	2A11 & 2A66	Elgin/Aurora	14	15	16	13	21	
	2A11 & 2A66	Elgin/Aurora	14	15	16	15	20	
	2A11 & 2A66	Elgin/Aurora	13	19	18	17	12	81
	2A11 & 2A66	Elgin/Aurora	15	15	17	14	20	82
	1A40	Freeport	10	14	14	20	24	83
	1A40	Freeport	10	13	19	18	19	80
	2A07 & 2A66	Glen Ellyn/Elgin	14	18	11	15	18	76
	2A17	Joliet	15	17	18	16	19	85
	2A19	Joliet	18	15	15	15	19	
	2A48	Joliet	15	19	15	15	21	
	2A17	Joliet	15	9	15	16	18	76
	2A17	Joliet	16	18	12	17	14	80
	2A50	Joliet	15	16	15	16	18	80
	2A17 & 2A22	Joliet/Kankakee	16	14	18	11	25	86
	2A22	Kankakee	16	15	18	15	23	88
	1A15	Rockford	12	20	21	15	26	94
	1A15	Rockford	17	23	15	19	21	
	1A15	Rockford	16	16	14	26	28	102
	1A19	Rockford	15	9	14	22	24	86
	1A42	Rockford	18	16	23 22	23 20	23 24	104 103
	1A55	Rockford Rockford	16 17	20 17		14	13	77
	1A42 1A27	Rockford	15	23	16 12	19	9	78
	1A55 & 1A16	Rockford/DeKalb	21	17	16	12	10	79
	2A36	Waukegan	18	14	17	21	22	94
	2A36	Waukegan	22	21	17	23	17	100
	2A36	Waukegan	0	21	22	24	36	105
	2A36	Waukegan	17	19	21	20	33	111
	2A36	Waukegan	18	22	25	19	32	119
	2A36	Waukegan	19	25	22	24	41	
	2A57	Waukegan	19	22	22	22	34	
	2A35	Waukegan	15	16	14	15	19	
	2A38	Waukegan	14	22	22	23	0	81

EXHIBIT B

MEMORANDUM OF AGREEMENT Cook County Child Protection Deferred Assignment Investigations

The Department of Children and Family Services (DCFS) and the American Federation of State, County and Municipal Employees (Union) agree to the below noted terms in an effort to hire, train, and have Child Protection Specialists (CPS) immediately available to be assigned to vacant positions within Cook County after Article XIX bidding contractual rights have been exhausted, i.e. "other means":

- No later than August 1, 2017, up to 18 applicants from an open competitive eligible list will be offered CPS positions that were not posted. This is in addition to hiring 20 CPS positions from the same open competitive list that are set to begin July 10, 2017, in positions that were posted and are at "other means." The additional 18 positions will have a working title of "Deferred Assignment Investigator (DAI).
- 2. Three (3) pools of six (6) DAI staff will exist throughout Cook County as follows:
 - a. Six (6) housed in the Deerfield office to cover Cook North investigations.
 - b. Six (6) housed in the Maywood office covering Cook Central investigations, including the Child Advocacy Office.
 - c. Six (6) housed at 6201 S. Emerald office covering Cook South investigations.
- 3. DAI's will officially report to an Area Administrator who will be responsible for assigning the DAI's to a supervisor for day-to-day assignments and supervision. The Area Administrators shall endeavor to limit the number of different supervisors giving assignments to the DAI's for continuity of supervision purposes during the PAI's probationary period.
- 4. The intent of the DAI is to be a temporary position until a vacancy becomes available at "other means" and not a permanent employment placement.
- 5. As CPS positions become vacant they will be posted for bid in accordance with Article XIX. Once contractual rights have been exhausted and the vacancy is at "other means", a DAI employee will be assigned to fill the vacancy as an agencydirected job assignment based upon their seniority (if needed, tie-break random number) and assigned Cook County Region. If no vacancy exists within the DAI's Cook County Region, the DAI may be assigned to a different Cook County Region provided that Region's DAI's have all been assigned to permanent vacancies.
- 6. The agency-directed job assignment shall not renew the probationary period; rather, the probationary period shall resume including the time spent in the DAI assignment. DAI employees must accept the agency-directed job assignment. Failure to do so may result in probationary discharge due to the intent of the DAI assignment addressed in #4 above.
- 7. DCFS shall notify the Union upon assignment of a DAI to a permanent CPS.

- 8. As the number of DAI positions is reduced by being assigned to permanent CPS. DCFS shall hire additional DAI positions to maintain up to 18 under the conditions described in #1 above. DCFS may change the number of DAI's assigned to each pool described in #2 above, but the total assigned per Cook County shall not exceed 18 without the express approval of both parties. The new DAI's will be assigned to permanent CPS and/or CPAdS positions consistent with the process described above.
- DCFS and the Union shall meet to discuss this agreement no later than three (3)
 months after its signing. Either party may request to meet sooner for discussions,
 which will not be unreasonably denied.
- 10. This agreement is entered into without precedent or prejudice and may not be utilized in any subsequent proceeding except for the enforcement of its terms.

For the Employer

For the Union

Dated:

EXHIBIT C

Average Assigned/Caseloads Fiscal Year 2017

July 2016-March 2017

Cook

	Average Assigned	Average Caseload
March 2017	11.7	17.8
February 2017	11.0	18.5
January 2017	10.7	17.6
December 2016	10.3	17.3
November 2016	10.4	18.4
October 2016	9.4	16.2
September 2016	9.5	15.4
August 2016	8.1	14.2
July 2016	7.4	16.6
Total	9.8	16.9

Northern

	Average Assigned	Average Caseload
March 2017	11.9	18.5
February 2017	11.7	19.8
January 2017	11.0	17.8
December 2016	9.3	17.2
November 2016	10.7	19.4
October 2016	9.9	17.1
September 2016	10.0	17.9
August 2016	9.7	19.3
July 2016	7.6	20.1
Total	10.2	18.6

Central

	Average Assigned	Average Caseload
March 2017	12.3	17.8
February 2017	10.4	16.3
January 2017	11.0	15.5
December 2016	9.4	14.7

Total	10.4	15.3
July 2016	9.1	14.4
August 2016	10.9	14.1
September 2016	10.8	14.3
October 2016	9.7	14.6
November 2016	9.7	15.8

Southern

	Average Assigned	Average Caseload
March 2017	10.9	13.8
February 2017	9.6	14.1
January 2017	9.7	13.4
December 2016	8.3	13.1
November 2016	9.3	14.4
October 2016	10.5	15.8
September 2016	11.1	15.7
August 2016	11.9	15.3
July 2016	8.8	13.9
Total	10.0	14.4

Statewide

	Average Assigned	Average Caseload
July 2016 to March 2017	10.1	16.3

EXHIBIT D

Worksite	Average Assigned	Average Caseload
Deerfield	12	16
1911 S Indiana	9	10
1026 S Damen	9	17
Maywood	10	17
6201 S Emerald	9	18
Harvey	10	18
CAC	9	12
Total	10	17

NORTHERN REGION

Worksite	Average Assigned	Average Caseload
Rockford	15	36
Sterling	8	12
Freeport	11	18
DeKalb	11	20
Woodstock	10	14
Aurora	14	21
Elgin	14	23
Glen Ellyn	12	16
Waukegan	12	20
Joliet	12	15
Kankakee	9	15

	12 17421	
Total	12	19

CENTRAL REGION

Worksite	Average Assigned	Average Caseload
Ottawa	10	8
Galesburg	10	17
Rock Island	11	13
Peoria	10	21
Canton	9	20
Lincoln	8	14
Carlinville	10	17
Taylorville	14	25
Quincy	7	13
Jacksonville	13	22
Springfield	10	15
Jerseyville	10	15
Charleston	10	16
Decatur	11	25
Urbana	10	16
Danville	14	26
Bloomington	14	24
Total	11	17

SOUTHERN REGION

Worksite	Average Assigned	Average Caseload
E. St. Louis	9	15
Carlyle	9	8
Sparta	7	11
Wood River	10	15
Alton	10	14
Granite City	9	11
Belleville	8	12
Marion	9	14
Effingham	7	11
Mt Vernon	10	10
Olney	11	19
Metropolis	13	23
Murphysboro	12	20
Anna	6	9
Harrisburg	8	10
Cairo	4	9
Total	9	13

DIVISION	EMPLOYEE NAME	TITLE	FUNCTION	EFFECTIVE DATE	TYPE OF SEPARATION	WORKSITE
SOUTHERN REGION		CP ADV SP	CHILD PROTECT SERV	1/31/2016	INTER-AGENCY TRANSFER/OUT	ALTON OFFICE
SOUTHERN REGION		CP ADV SP	CHILD PROTECT SERV	1/31/2017	SEPARATION, RETIREMENT (SERS)	ALTON OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	6/24/2016	SEPARATION, RELOCATING RESIDENCE	AURORA REGIONAL OFFICE
CENTRAL REGION		CP SPEC	CHILD PROTECT SERV	1/31/2016	SEPARATION, ANOTHER POSTION (STATE)	CHARLESTON OFFICE
CENTRAL REGION		CP SPEC	CHILD PROTECT SERV	5/5/2017	SEPARATION, RETIREMENT (SERS)	CHARLESTON OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	1/10/2016	SEPARATION, RETURN TO SCHOOL	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	1/29/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	11/18/2016	SEPARATION, NO REINSTATEMENT RIGHTS	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		C&FSI/OP2	CHILD PROTECT SERV	1/31/2017	SEPARATION, ANOTHER POSTION (STATE)	CHICAGO 1026 5 DAMEN OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	6/6/2016	SEPARATION - PERSONAL REASONS	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CP ADV SP	CHILD PROT AFTERHOUR	12/31/2016	SEPARATION, RETIREMENT (SERS)	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CP ADV SP	CHILD PROT AFTERHOUR	1/31/2017	SEPARATION, RETIREMENT (SERS)	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		C&FSI/OP2	CHILD PROTECT SERV	3/27/2017	SEPARATION, TERMINATED (NON-CERTIFIED)	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	6/30/2017	INTER-AGENCY TRANSFER/OUT	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CP ADV SP	SERIOUS HARM INV	1/15/2016	INTER-AGENCY TRANSFER/OUT	CHICAGO EMERALD OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	3/4/2016	SEPARATION, HEALTH	CHICAGO EMERALD OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	6/30/2016	SEPARATION, RETIREMENT (SERS)	CHICAGO EMERALD OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	6/30/2016	SEPARATION, RETIREMENT (SERS)	CHICAGO EMERALD OFFICE
COOK REGION		C&FSI/OP2	CHILD PROTECT SERV	9/28/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	CHICAGO EMERALD OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	5/14/2017	DISCHARGE WITH RIGHT OF APPEAL	CHICAGO EMERALD OFFICE
CENTRAL REGION		CP SPEC	CHILD PROTECT SERV	4/15/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	DANVILLE OFFICE
CENTRAL REGION		CP SPEC	CHILD PROTECT SERV	9/8/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	DANVILLE OFFICE
CENTRAL REGION		CP ADV SP	CHILD PROTECT SERV	1/31/2017	SEPARATION, HEALTH	DANVILLE OFFICE
CENTRAL REGION		CP ADV SP	CHILD PROTECT SERV	5/4/2016	SEPARATION, NO REINSTATEMENT RIGHTS	DECATUR OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	1/20/2016	SEPARATION - PERSONAL REASONS	DEERFIELD OFFICE
COOK REGION		C&FSI/OP1	CHILD PROTECT SERV	9/16/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	DEERFIELD OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	6/24/2016	DISCHARGE FOR CAUSE	DEKALB OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	5/31/2016	SEPARATION, RETIREMENT (SERS)	ELGIN OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	4/30/2017	SEPARATION, RETIREMENT (SERS)	ELGIN OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	2/19/2016	SEPARATION - PERSONAL REASONS	FREEPORT FIELD OFFICE
NORTHERN REGION		CP ADV SP	CHILD PROTECT SERV	1/29/2016	SEPARATION, RETIREMENT (SERS)	GLEN ELLYN OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	3/22/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	GLEN ELLYN OFFICE
SOUTHERN REGION		CP SPEC	CHILD PROTECT SERV	1/6/2016	SEPARATION, DEATH	GRANITE CITY OFFICE
SOUTHERN REGION		C&FSI/OP1	CHILD PROTECT SERV	5/31/2017	SEPARATION, ANOTHER POSTION (STATE)	HARRISBURG OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	2/9/2016	SEPARATION, NO REINSTATEMENT RIGHTS	HARVEY OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	7/21/2016	SEPARATION, HEALTH	HARVEY OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	12/12/2016	SEPARATION, NO REINSTATEMENT RIGHTS	HARVEY OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	2/28/2017	SEPARATION, RETIREMENT (SERS)	HARVEY OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	5/31/2017	SEPARATION, RETIREMENT (SERS)	HARVEY OFFICE
COOK REGION		CP SPEC	CHILD PROTECT SERV	6/15/2017	INTER-AGENCY TRANSFER/OUT	HARVEY OFFICE
CENTRAL REGION		CP ADV SP	CHILD PROTECT SERV	2/5/2016	SEPARATION, NO REINSTATEMENT RIGHTS	JACKSONVILLE OFFICE
NORTHERN REGION		CP SPEC	CHILD PROTECT SERV	3/10/2017	SEPARATION - PERSONAL REASONS	JOLIET OFFICE
NORTHERN REGION		CP ASC SP	CHILD PROTECT SERV	3/31/2017	INTER-AGENCY TRANSFER/OUT	JOLIET OFFICE
SOUTHERN REGION		CP ADV SP	CHILD PROTECT SERV	2/19/2016	SEPARATION, RETIREMENT (SERS)	MARION OFFICE
SOUTHERN REGION		CP SPEC	CHILD PROTECT SERV	8/5/2016	SEPARATION, ANOTHER POSITION (NON-STATE)	MARION OFFICE

DIVISION	EMPLOYEE NAME	TITLE	PIN	EFFECTIVE DATE	WORKSITE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		6/27/2016	ALTON OFFICE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		6/27/2016	ALTON OFFICE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		6/29/2016	ALTON OFFICE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		9/12/2016	ALTON OFFICE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		1/23/2017	ALTON OFFICE
SOUTHERN REGION		CHILD PROTECTION SPECIALIST		3/6/2017	BELLEVILLE FIELD OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		4/18/2016	BLOOMINGTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		4/18/2016	BLOOMINGTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		6/6/2017	BLOOMINGTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		6/12/2017	BLOOMINGTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		4/25/2016	CANTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		2/1/2017	CANTON OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		4/25/2016	CARLINVILLE OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		10/3/2016	CARLINVILLE OFFICE
CENTRAL REGION		CHILD PROTECTION SPECIALIST		2/6/2017	CARLINVILLE OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/19/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/1/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 1		2/1/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/1/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/29/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/29/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		6/20/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		6/20/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		10/17/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		12/6/2016	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/3/2017	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/30/2017	CHICAGO 1026 5 DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/30/2017	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/30/2017	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/1/2017	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/16/2017	CHICAGO 1026 S DAMEN OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		1/19/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/1/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/1/2016	CHICAGO 1911 \$ INDIANA OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/1/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILDREN & FAMILY SERVICES INTERN/OPT 2		2/1/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/29/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/29/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		2/29/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		6/20/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		6/20/2016	CHICAGO 1911 S INDIANA OFFICE
COOK REGION		CHILD PROTECTION SPECIALIST		7/1/2016	CHICAGO 1911 S INDIANA OFFICE

EMPLOYEE NAME	TITLE	PIN	EFFECTIVE DATE	TYPE OF MOVE	WORKSITE
	CHILD PROTECTION SPECIALIST		10/1/2016	TRANSFER, GEOGRAPHIC	ALTON OFFICE
	CHILD PROTECTION SPECIALIST		1/1/2016	JOB ASSIGNMENT	AURORA REGIONAL OFFICE
	CHILD PROTECTION SPECIALIST		3/1/2016	TRANSFER, GEOGRAPHIC	AURORA REGIONAL OFFICE
	CHILD PROTECTION SPECIALIST		4/1/2016	JOB ASSIGNMENT	AURORA REGIONAL OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		5/16/2016	JOB ASSIGNMENT	AURORA REGIONAL OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		7/16/2016	JOB ASSIGNMENT	AURORA REGIONAL OFFICE AURORA REGIONAL OFFICE BELLEVILLE FIELD OFFICE BELLEVILLE FIELD OFFICE BELLEVILLE FIELD OFFICE BELLEVILLE FIELD OFFICE
	CHILD PROTECTION SPECIALIST		2/16/2016	JOB ASSIGNMENT	BELLEVILLE FIELD OFFICE
	CHILD PROTECTION SPECIALIST		6/1/2016	JOB ASSIGNMENT	BELLEVILLE FIELD OFFICE
	CHILD PROTECTION SPECIALIST		10/1/2016	JOB ASSIGNMENT	BELLEVILLE FIELD OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		4/1/2017	JOB ASSIGNMENT	BELLEVILLE FIELD OFFICE
	CHILD PROTECTION SPECIALIST		4/1/2016	JOB ASSIGNMENT	
	CHILD PROTECTION ADVANCED SPECIALIST		6/1/2016	JOB ASSIGNMENT	BLOOMINGTON OFFICE
	CHILD PROTECTION SPECIALIST		9/16/2016	JOB ASSIGNMENT	BLOOMINGTON OFFICE BLOOMINGTON OFFICE BLOOMINGTON OFFICE BLOOMINGTON OFFICE BLOOMINGTON OFFICE BLOOMINGTON OFFICE
	CHILD PROTECTION SPECIALIST		2/16/2017	JOB ASSIGNMENT	BLOOMINGTON OFFICE T
	CHILD PROTECTION SPECIALIST		5/1/2017	TRANSFER, GEOGRAPHIC	BLOOMINGTON OFFICE
	CHILD PROTECTION SPECIALIST		5/1/2016	TRANSFER, GEOGRAPHIC	CARLINVILLE OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		9/1/2016	PROMOTION	CARLINVILLE OFFICE
	CHILD PROTECTION SPECIALIST		2/16/2017	JOB ASSIGNMENT	CARLINVILLE OFFICE CARLINVILLE OFFICE CARLINVILLE OFFICE
	CHILD PROTECTION SPECIALIST		4/1/2017	JOB ASSIGNMENT	
	CHILD PROTECTION SPECIALIST		7/1/2016	JOB ASSIGNMENT	CARLYLE OFFICE CHARLESTON OFFICE CHARLESTON OFFICE
	CHILD PROTECTION SPECIALIST		6/1/2017	JOB ASSIGNMENT	CHARLESTON OFFICE
	CHILD PROTECTION SPECIALIST		1/16/2016	PROMOTION	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		3/16/2016	TRANSFER, GEOGRAPHIC	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION SPECIALIST		3/16/2016	REDUCTION, VOLUNTARY	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION SPECIALIST		1/3/2017	PROMOTION	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION SPECIALIST		3/16/2017	PROMOTION	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION SPECIALIST		6/16/2017	PROMOTION	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION SPECIALIST		6/16/2017	JOB ASSIGNMENT	CHICAGO 1026 S DAMEN OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		2/16/2016	PROMOTION	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION SPECIALIST		7/1/2016	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION SPECIALIST		8/1/2016	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		10/1/2016	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION SPECIALIST		12/16/2016	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION SPECIALIST		2/1/2017	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION SPECIALIST		3/16/2017	PROMOTION	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		4/1/2017	PROMOTION	CHICAGO 1911 S INDIANA OFFICE. [™]
	CHILD PROTECTION SPECIALIST		5/1/2017	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE ပို
	CHILD PROTECTION SPECIALIST		5/1/2017	JOB ASSIGNMENT	CHICAGO 1911 S INDIANA OFFICE
	CHILD PROTECTION ADVANCED SPECIALIST		8/1/2016	PROMOTION	CHICAGO EMERALD OFFICE
	CHILD PROTECTION SPECIALIST		12/1/2016	JOB ASSIGNMENT	CHICAGO EMERALD OFFICE

EMPLOYEE NAME	OLD PIN OLD CPS WORKSITE	NEW PIN	NEW TITLE	NEW WORKSITE
	AURORA REGIONAL OFFICE		SOCIAL SERVICES PROGRAM PLANNER IV (RC)	AURORA REGIONAL OFFICE
	AURORA REGIONAL OFFICE		CHILD WELFARE ADVANCED SPECIALIST	AURORA REGIONAL OFFICE
	AURORA REGIONAL OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	AURORA REGIONAL OFFICE
	BELLEVILLE FIELD OFFICE		MANAGEMENT OPERATIONS ANALYST II	BELLEVILLE FIELD OFFICE
	BLOOMINGTON OFFICE		CHILD WELFARE ADVANCED SPECIALIST	BLOOMINGTON OFFICE
	BLOOMINGTON OFFICE		CHILD WELFARE SPECIALIST	BLOOMINGTON OFFICE
	BLOOMINGTON OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHAMPAIGN AREA OFFICE
	CANTON OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CANTON OFFICE
	CARLINVILLE OFFICE		CHILD WELFARE SPECIALIST	2200 CHURCHILL RD
	CARLINVILLE OFFICE		CHILD WELFARE SPECIALIST	CARLINVILLE OFFICE
	CHARLESTON OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CHARLESTON OFFICE
	CHICAGO 1026 S DAMEN OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO 1026 S DAMEN OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHICAGO 17 NORTH STATE OFFICE
	CHICAGO 1026 S DAMEN OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHICAGO 17 NORTH STATE OFFICE
	CHICAGO 1026 S DAMEN OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CHICAGO 1026 S DAMEN OFFICE
	CHICAGO 1026 S DAMEN OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHICAGO 17 NORTH STATE OFFICE
	CHICAC > 1026 S DAMEN OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHICAGO 17 NORTH STATE OFFICE
	CHICAGO 1023 S DAMEN OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO 1026 S DAMEN OFFICE		CHILD WELFARE ADVANCED SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO 1911 S INDIANA OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO 1911 S INDIANA OFFICE		CHILD WELFARE ADVANCED SPECIALIST	MAYWOOD OFFICE
	CHICAGO 1911 S INDIANA OFFICE		CHILD WELFARE ADVANCED SPECIALIST	MAYWOOD OFFICE
	CHICAGO 1911 S INDIANA OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO EMERALD OFFICE		MANAGEMENT OPERATIONS ANALYST II	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	HARVEY OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO EMERALD OFFICE
	CHICAGO EMERALD OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CHICAGO EMERALD OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1026 S DAMEN OFFICE
	CHICAGO EMERALD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1026 S DAMEN OFFICE
	CHICAGO EMERALD OFFICE		EXECUTIVE I	CHICAGO 1911 S INDIANA OFFICE
	CHICAGO EMERALD OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CHICAGO EMERALD OFFICE
	CHILDREN'S ADVOCACY CENTER		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	CHICAGO 1911 S INDIANA OFFICE
	DECATUR OFFICE		PUBLIC SERVICE ADMIN-OPT 6 HUMAN (RC)	DECATUR OFFICE
	DEERFIELD OFFICE		HUMAN RIGHTS INVESTIGATOR II	CHICAGO 1911 S INDIANA OFFICE
	DEERFIELD OFFICE		CHILD WELFARE SPECIALIST	CHICAGO 1911 S INDIANA OFFICE

Exhibit L

Heidi Dalenberg

From:

Heidi Dalenberg

Sent:

Friday, July 14, 2017 5:54 PM

To:

'Solomon, Beth'; Ben Wolf; Claire Stewart; Marci White; Testa, Mark F; Greenspan,

Barbara; Spacapan, Lise

Subject:

RE: B.H. v. Walker -- Letter to Plaintiffs Counsel Regarding Caseloads

Thank you for the correspondence sent today. I note, however, that the letter provided does not address all points raised in my letter to you of July 7, 2017. We asked for several commitments regarding prior statements made in Court, as well as for additional information not yet provided. Please promptly address the outstanding issues.

Please also note, again, that the "averaging" that the Department apparently continues to employ in considering compliance with the investigators' case assignment limits under the Decree is patently invalid. We will review the material you have provided, but state again that such "averaging" is baseless under the Decree.

Heidi Dalenberg Riley Safer Holmes & Cancila LLP Three First National Plaza 70 W. Madison Street, Suite 2900 Chicago, Illinois 60602 (312) 471-8730 hdalenberg@rshc-law.com www.rshc-law.com



From: Solomon, Beth [mailto:Beth.Solomon@illinois.gov]

Sent: Friday, July 14, 2017 5:06 PM

To: Heidi Dalenberg <hdalenberg@rshc-law.com>; Ben Wolf <bwolf@ACLU-il.org>; Claire Stewart <cstewart@ACLU-il.org>; Marci White <mwhitedcr@gmail.com>; Testa, Mark F <mtesta@email.unc.edu>; Greenspan, Barbara <Barbara.Greenspan@illinois.gov>; Spacapan, Lise <Lise.Spacapan@illinois.gov>
Subject: B.H. v. Walker -- Letter to Plaintiffs' Counsel Regarding Caseloads

Attached please find a response to your June 7 and July 7, 2017 correspondence. Please note that two of the attachments are Excel Speadsheets and do not have an exhibit coversheets but they are titled for ease of identification.

Beth I. Solomon
Senior Litigation Counsel
DCFS Office of Legal Services
160 North La Salle Street, Sixth Floor
Chicago, Illinois 60601
(312) 814-2481 (direct)
(312) 814-2401 (main)
Beth.Solomon@illinois.gov

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 107 of 179 PageID #:3584

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Heidi Dalenberg

From: Heidi Dalenberg

Sent: Thursday, July 20, 2017 9:03 AM

To: Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth Solomon

(Beth.Solomon@illinois.gov); lise.spacapan@illinois.gov

Cc: Claire Stewart

Subject: Meeting

Counsel – I may have missed it, but I do not see it on the chart of information provided – am I correct that we do not have (i) a written description of what the Department is doing to address hiring of investigators and assessment of the "front end" of the system, or (ii) identification of the number of vacancies DCFS presently is trying to fill? The vacancy report that I know we received only shows who is in the pipeline.

Heidi Dalenberg
Riley Safer Holmes & Cancila LLP
Three First National Plaza
70 W. Madison Street, Suite 2900
Chicago, Illinois 60602
(312) 471-8730
hdalenberg@rshc-law.com
www.rshc-law.com



Exhibit M

Heidi Dalenberg

From: Claire Stewart <cstewart@ACLU-il.org>

Sent: Thursday, August 3, 2017 4:28 PM **To:** mwhitedcr@gmail.com; Mark F Testa

Cc: Heidi Dalenberg; Ben Wolf

Subject: FW: BH - Investigative Caseloads

Attachments: 2017 Plan on Investigative Caseloads_rev_8_3_2017.pdf; B.H. Stats CY2017 From January

through June 24 Hours Assignment.xls; Copy of B.H. Stats CY2017 From January

through June 72 Hours Assignment.xls; Intern Training Protocol.pdf

FYL

Claire E. W. Stewart

From: Greenspan, Barbara [mailto:Barbara.Greenspan@illinois.gov]

Sent: Thursday, August 03, 2017 4:19 PM

To: Heidi Dalenberg <hdalenberg@rshc-law.com>; Claire Stewart <cstewart@ACLU-il.org>; Ben Wolf <bwolf@ACLU-

il.org>

Cc: Spacapan, Lise <Lise.Spacapan@illinois.gov>; Solomon, Beth <Beth.Solomon@illinois.gov>

Subject: BH - Investigative Caseloads

Attached is the 2017 Plan To Monitor and Reduce Investigative Caseloads, as well as Exhibit A: Caseload Statistics for CY 2017, January – June, for Newly Assigned Investigations, 24 hours Assignment, and Caseload Statistics for CY 2017, January – June, for Newly Assigned Investigations, 72 hours Assignment (the key for the column headings is on Tab 2); and Exhibit B: Intern Training Protocol.

Please let us know if you would like to discuss these matters.

Best,

Barb

Barbara L. Greenspan
Assistant Attorney General
Chief, Child Welfare Litigation Bureau
100 W. Randolph, Suite 11-200
Chicago, Illinois 60601

Phone: 312/814-7087; Fax: 312/814-6885

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2017 PLAN TO MONITOR AND REDUCE INVESTIGATIVE CASELOADS

I. Development of Caseload Reporting Tool

The DCFS Division of Operations and the DCFS Office of Information Systems developed a report reflecting the caseload report for child protection specialists ("CPS"). [Attached as Exhibit A] This report contains a monthly list, by DCFS region and team, of newly-assigned cases by individual CPS. One column on the report reflects, by CPS, the total newly-assigned cases for the calendar year-to-date. The report will be provided to the Senior Deputy of Operations, Deputy Director of Operations for Child Protection, Regional Administrators, Area Administrators, and Supervisors on a monthly basis. These operational management staff will be trained in the expectation to review and analyze the information monthly to determine status and challenges associated with case assignment and caseload. Trends in relation to case assignments will be communicated to the Deputy of Employee Services, who will assess whether to increase staffing levels as needed.

II. Deferred Assignment Investigators for Cook County

DCFS will hire 15- 17 Deferred Assignment Investigators for Cook County who will start employment during the week of August 21, 2017. The Deferred Assignment Investigators will immediately participate in Foundations training. Upon completion of training, a team of three Deferred Assignment Investigators will be headquartered in one of these three offices: Deerfield, Maywood and Emerald. The Deferred Assignment Investigators will handle overflow cases or case assignments from Deerfield/1911 S. Indiana, Maywood/Damen, and Emerald/Harvey offices until a position becomes available that can be filled by someone external to DCFS. When such a vacancy occurs, a Deferred Assignment Investigator will be placed in that permanent position. As the pool participants are moved into permanent positions, DCFS will seek to add new investigators to the pool.

III. Changes to Work Experience Requirements for Child Protection Staff

DCFS began the process to change the work experience requirements for CPS. We are aligning these requirements with the requirements that currently exist for Child Welfare Specialists. Currently the requirements for CPS are as follows:

- If the applicant has a master's degree in the following fields, s/he must have two years of
 directly related professional experience: social work or a related human service field;
 criminal justice, criminal justice administration or law enforcement;
- If the applicant has a bachelor's degree in the following fields, s/he must have four years of directly related professional experience: social work or a related human service field; criminal justice, criminal justice administration or law enforcement.

However, to qualify for a position as a Child Welfare Specialist, an applicant with the above described master's degrees needs only one year of work experience, and an applicant with the

above described bachelor's degrees needs only two years of relevant work experience. By aligning the experience requirements for both positions, DCFS expects additional candidates to apply for CPS positions. Further, permanency workers and investigators should have commensurate experience.

These changes have been agreed to by the union, and submitted to the Illinois Civil Service Commission. DCFS expects the Commission to approve the changes at the August 17, 2017 meeting.

IV. Increased Staffing of Certain Downstate Offices

DCFS is negotiating with the union regarding the implementation of a downstate pool concept to serve offices that are identified as having a trend of vacancies coupled with a low rate of qualified job applicants. To alleviate the pressure in offices with this problem, DCFS met with the union on July 21, 2017 about a process that would allow us to hire additional staff in certain different downstate offices when the eligible candidates for those offices exceeds the number of vacancies. A follow-up meeting with the union is scheduled for August 4, 2017. If an agreement is reached, this process would provide a pipeline of available staff to fill vacancies as well as assist other current investigators during periods of vacation or leaves. The offices that would be supported by this pipeline include Rockford, Waukegan, Elgin, Aurora, Peoria, Bloomington and Urbana, Springfield and Joliet.

V. Streamlining of Hiring Process for Child Protection Vacancies

DCFS has implemented the following steps with the goal of anticipating vacancies and aggressively filling positions:

- DCFS maintains continuous postings for CPS positions in: Waukegan, Rockford, Elgin, Urbana, Mt. Vernon, Peoria, Bloomington, Charleston, Galesburg. Springfield, Danville, Rock Island, Marion, Harrisburg, Freeport and Cook County.
- When needed, DCFS obtains the agreement of the union to maintain postings for internal
 positions for five days instead of the ten days as set forth in the Master collective
 bargaining agreement.
- DCFS exercises its right to backfill vacancies that are created when a CPS moves to another position within the same DCFS office. This process eliminates the timeframe to repost a position when staff move from one team to another within the same office.
- DCFS posts vacancies as soon as they are identified and no longer waits for committee approval process between the Employee Services and Budget and Finance offices.
- The DCFS Office of Employee Services monitors the status of Central Management Services' grading process for CPS applicants and will identify any significant delays should they arise again, as they did in the past. As of today, CMS Examining confirmed that it is current on grading of applications for CPS titles.

VI. Hiring of Child and Family Service Interns

DCFS currently intends to hire Child and Family Service Interns in a limited number of offices where there continue to be high caseloads and lack of candidates to fill those positions. Offices where DCFS currently is considering hiring interns include: Bloomington, Peoria, Rock Island and Urbana in the Central Region and Freeport, Rockford, Elgin, Waukegan and Kankakee in the Northern Region. A Child and Family Service Intern is an individual who meets the educational requirements for a CPS position but does not have the required years of child welfare work experience. An Intern Protocol for training and case assignment has recently been approved by the Director. The protocol sets limits on both the number and type of cases that may be assigned to a CPS intern during the intern's first six months on the job. [Protocol attached as Exhibit B]

VII. Specific Actions Taken in the Central Region

In addition, the Central Region recently implemented several steps to address investigative caseloads:

- Commencing July 10, 2017, two CPS from the Southern Region were detailed to the Urbana field office to accept primary assignments.
- Commencing July 10, 2017, one CPS from the Rock Island office was detailed to the Urbana field office to accept primary assignments.
- Commencing July 2017, one Child Protection Specialist from the Ottawa field office has been detailed to the Peoria field office to accept primary assignments.
- Commencing June 2017, the CPS assigned as the Champaign sub-region floater returned to the Bloomington field office to accept primary assignments.
- Since October 2016, any CPS in the Urbana, Bloomington and Peoria field offices who is transferring to another position or another division will be given a start date 60 days from the date of acceptance of the position and is then detailed back to their CPS position for four to six weeks to remain in rotation for primary assignments.
- Since December 2016 one Child Protection Supervisor in the Urbana field office attends all forensic interviews at the Children's Advocacy Center, which allows CPS staff field time to initiate reports and complete other assigned duties.
- Intake for Shelby County and Clark County is being covered by CPS staff in the Southern Region. This began on 4/17/17 and continues today.

VIII. Specific Actions Taken in the Northern Region

In addition, the Northern Region recently implemented several steps to address investigative caseloads:

- Commencing February 2016 to date, DCFS has detailed one or two CPS to Waukegan
 from the Woodstock field office. Four CPS from the Glen Ellyn field office were
 detailed to Waukegan on 7/10/17 and four CPS from the Southern Region were detailed
 to the Glen Ellyn field office on 7/10/17. These details are typically four to six weeks in
 length.
- Commencing May 15, 2017, one CPS from the Glen Ellyn field office was detailed to the Elgin field office. This detail will continue until September 11, 2017 when two new CPS are scheduled to complete training and be assigned cases in the Elgin field office.
- In July 2017, for 60 work days, two Child Protection Supervisors were temporarily assigned to the field in the Waukegan field office to handle investigations.
- The Northern Region continues several overtime projects including: CPS from the Rockford field office will receive paid overtime to complete cases and all qualified division staff from the Rockford sub-region will receive paid overtime to assist in investigations; CPS from the Sterling, DeKalb and Freeport field offices will receive paid overtime to assist the Rockford field office in after-hours work; qualified divisional staff will receive paid overtime to assist in after-hours and weekend assignments for investigations in the Elgin and Aurora field offices.
- Intake in Boone County has been assigned to CPS in the DeKalb field office with union agreement.
- Intake for seven cities in Winnebago County, such as Machesney Park, has been assigned to CPS in the Freeport field office with union agreement.
- Since May 2016, with the agreement of the union, DCFS developed a supplemental oncall agreement so that CPS staff from the Elgin and Aurora field offices are on a single on-call schedule.
- CPS from the Elgin and Aurora field offices are on a single intake rotation so all supervisors can rotate assignment of investigations.
- One Area Administrator is assigned to both the Elgin and Aurora field offices in order to streamline and coordinate case assignments throughout Kane County.
- In 2017, DCFS realigned staff in the Waukegan field office to equalize the supervisor-staff ratio. The realignment resulted in the creation of a sixth child protection team.
- Other activities include: CPS staff allowed to 'work away' rather than return to the field
 office in between assignments, which is possible due to the mobile app on staff iPhone;
 designated morning hours to complete entry of documents, such as Child Endangerment
 Risk Assessment Protocol and initiation notes.

Intern Training Protocol (DCP)

<u>UPON SUCCESSFUL COMPLETION OF CHILD PROTECTION FOUNDATIONS TRAINING</u>, Intern level staff will participate in a minimum four month educational program organized by Operations/Regional leadership, utilizing the format outlined below. The outline is a framework, and is not meant to replace or supersede the specific training needs of an individual Intern, or the assessment of the supervisor/management. This framework is the minimal training an Intern should receive in his or her first 4 months in the child protection Intern position.

Day One Field Orientation:

- -Emergency contacts and what to do in an emergency
- -Time-sheets being at work on time
- -Travel- what qualifies and how to do it
- -Call-off procedure
- -Office phone list
- -Office community resource list

Caseload Assignment Guidelines weeks 1-16 & Training Allegations:

Interns will be assigned investigations involving allegations: #74, #76, #77, #78, and #82 for no less than 2 months.

Interns should not be given primary assignment of any serious harm allegations during the first six months, nor should they be assigned parallel responsibility to a serious harm investigation during their first six months. Serious harm allegations are defined as: Death (by abuse or neglect #1/51), Head Injury (by abuse or neglect #2/52), Internal Injury (by abuse or neglect #4/54), Burns (by abuse or neglect #5/55), Wounds (by abuse or neglect #7/57), Broken Bones (by abuse or neglect #9/59), or Sexual Penetration (including allowed #19), Sexual Molestation (including allowed #21), Sexual Exploitation (including allowed) #20. Any assignment to complete an undetermined report in the Intern's first six months which involves serious harm allegations requires Area Administrator's approval before assignment.

Depending on the Intern's evaluation and readiness, the Intern may be assigned allegations #84 and #60, based on presenting complexity of the case, starting in the third month. Complexity may be defined as, but is not limited to: age of the child(ren), number of children, disability of child(ren) or caregiver, mental illness or impairment of the child(ren) or caregiver, domestic

violence and or substance abuse, immediate safety threats present in the home at intake, multiple allegations, multiple children or alleged perpetrators in multiple locations. An Intern will not be assigned #84 and #60 if the complexities of the case are beyond the Intern's level of training at the time of the assignment.

Starting in the fourth month, the Intern may be requested to assist his/her mentor on investigations involving other non-serious harm allegations. This will be determined by the supervisor and the mentor, based on the level of training and skill of the Intern as well as the complexity of the case.

Supervision and Mentors:

Each Intern will be assigned a Supervisor to provide supervision, assignments, evaluations, and to oversee the overall progress and training goals. Each intern will also be assigned a Mentor, who will at the direction of the Intern's Supervisor, assist in providing field training and in office training (SACWIS [State Automated Child Welfare Information System], training on forms to fill out, etc.) training regarding technology and investigation practices and techniques to the Intern. The Mentor will be an experienced Investigator (identified as a Child Protection Advanced Specialist [CPAS] or at least an experienced investigator who has a proclivity for mentoring and training). The Supervisor shall ultimately have the responsibility of providing and ensuring the adequate training of the Intern. The Supervisor shall also provide the weekly supervision of the Intern and the monthly evaluation of the Intern. It is the responsibility of the Supervisor, with the input from the assigned Mentor, to determine the Intern's curriculum, level of competence, and whether the Intern has completed his/her training and whether the intern will be recommended for promotion to a certified Child Protection Specialist (CPS).

Training Caseload:

Week 1: Shadow a CPAS, or designated mentor, for 1 week. 0 investigations primarily assigned.

Purpose: To establish the preliminary and basic skills of an investigator. To observe in-person interviews, interaction, engagement of clients; to observe and overhear phone contacts and collateral contacts, questions to ask, why you ask questions and how you ask questions; observe completion of screens, and CERAP(Child Endangerment Risk Assessment Protocol); observe documentation skills of mentor, observe when and how to document; observe navigation of SACWIS; observe positive mentor skills; observe the development and organization of the hard copy file, and what to put in it; observe interaction in court (shelter and adjudication hearings). The mentor will complete at least one investigation so the Intern can observe the completion and submission of an investigation in SACWIS.

Week 2: Shadow a CPAS, or designated mentor. 1 parallel on Mentor's caseload will be assigned to the Intern.

Purpose: Provide field training. Mentor to accompany and observe the Intern conduct inperson and phone contacts with clients and collaterals. The mentor will observe the Intern's ability to process information, ask questions, assess the situation/environment, and will observe completion of screens and CERAPs by the Intern. The mentor will review Intern's documentation in SACWIS for completeness and accuracy. The Intern will receive feedback daily on status of developing skills from mentor and supervisor.

Week 3: Intern to be assigned 1 pending Undetermined investigation report and 1 additional parallel investigation.

Purpose: Provide ongoing simultaneous training in the field and with mandatory documentation. Intern to enter notes into SACWIS; demonstrate accurate and complete notes; demonstrate ability to complete checklist; demonstrate ability to complete closing CERAP; demonstrate ability and willingness to seek supervision; Intern to demonstrate the ability to complete parallel tasks and contacts on the Undetermined report.

Mentor will assist Intern in navigating SACWIS, completing Tabs, and submitting the Undetermined investigation report if able.

Week 4: Intern to receive 1 new investigation report (allegations #74, #76, #77, #78, or #82).

Purpose: Provide training on how to manage a caseload. An Undetermined investigation report may be assigned to the Intern if he/she has closed the prior assigned Undetermined investigation report. If not, feedback should be provided and demonstration by the mentor or supervisor should occur. *First Monthly Evaluation to be conducted on the Intern by the Supervisor is due.

Week 5: Intern to receive 1 new investigation report (allegations #74, #76, #77, #78, or #82) and 1 parallel investigation.

Purpose: Demonstrate ability to close and manage caseload. Intern to close previously assigned Undetermined investigation reports if not already submitted. If Intern is struggling to close the 1 prior Undetermined investigation report not closed in week 3 or 4, this needs to be made the priority for the week. The ability to close investigations is the foundation for increasing Intern case assignments.

Week 6: Intern to receive 1 new investigation and 1 Undetermined or parallel investigation.

Purpose: Intern to close previously assigned Undetermined investigation reports, if not already submitted. If Intern is struggling to close the 1 or 2 prior Undetermined investigation reports, no new Undetermined investigations will be assigned to the Intern. The ability to close investigations is the foundation for assigning more than 1 new investigation report this week.

Week 7: Intern to receive 1-2 new investigation(s) and/or 1 Undetermined or parallel investigation.

Purpose: Caseload management. Intern to close previously assigned investigations, if not already submitted. If Intern is not pending under 5 cases, and not closing investigations- no more than 1 new and 1 parallel investigation are to be assigned this week.

Week 8: Intern to receive 1 new investigation.

Purpose: Ongoing caseload management training. Intern to close previously assigned investigations, if not already submitted. If Intern is not pending under 5 cases, and not closing investigations- no more than 1 new and 1 parallel investigation are to be assigned this week. *Intern's second Monthly Evaluation due.

Weeks 9-12: Intern to receive integration of allegation 60 investigations.

During this 4 week or 1 month period of time, the Intern may receive 4-6 new investigations based on the Intern's skill level and monthly evaluation discussions.

Although Interns may be assigned up to 6 new investigations during this time, an Intern's caseload should never exceed a total of 10 pending investigations during this 1 month period. The Intern's ability to close investigations is the foundation for increasing the Intern's case assignment, not the intake of the DCP unit. Intern should also continue to receive training and guidance from the mentor and the supervisor. Documented supervision should occur at least once a week. *Intern's third Monthly Evaluation is due after week 12.

Weeks 13-16: Intern to receive integration of abuse allegations: #6 (noxious substance), #10 (risk of harm), #11 (cuts, bruises, welts, abrasions and oral injuries), and #12 (human bites).

During this 4 week or 1 month period of time, the caseload may reflect up to 6 newly assigned investigations based on the Intern's skill level and monthly evaluation discussions. However, the Intern's caseload should never exceed a total of 10 pending investigations during this 1 month period. Interns should also continue to receive training on caseload management. *Intern's fourth Monthly Evaluation is due after week 16.

Caseload after Completion of Training

DCFS management staff will complete the four month evaluation immediately following completion of week 16 activities and review such with the Intern. If the Intern has not successfully completed the training and demonstrated ability relating to skill and knowledge, DCFS management staff will ensure Intern is fully informed and will develop additional training activities if deemed appropriate and possible. All regional management staff should be informed including the supervisor, area administrator and the regional administrator as well as Office of Employee Services.

If the Intern has successfully completed the 16 week training program as well as all required DCFS foundation and specialty training the supervisor will ensure that Intern staff are assigned investigations appropriate to their demonstrated skill and knowledge level while providing constant oversight and supervision with in person supervision occurring no less than weekly. Assignment of new investigations will coincide with BH set standards of no more than 12 new investigation assignments for 9 months of the year and no more than 15 new assignments for 3 months of the year. If the supervisor discovers at any time that the Intern is exhibiting difficulty in completing certain investigations the supervisor will immediately address and arrange for any remedial assistance such as having a mentor assist or if necessary, transferring the investigation to a more experienced employee.

Supervisory Led Weekly Trainings Topics

The training day should remain the same from week to week. Trainings are to be mandatory and be protected time.

Date	Topic and Agenda	Presenter(s) PSA Name	
Week 1	Orientation SACWIS navigation How to "read" a CPS caseload and prioritize the work Alerts and how to use them Ticklers and how to use them Data check importance LEADS Review of police reports What to take/not take with you Knocking on the door Identification Getting in the house What to expect Worker safety Immediate observation of the environment Consents to release information Photos/Camera Equipment Non-verbal communication & documentation of such		
Week 2	Initial Interviews with Adults and Alleged perpetrators, use screens • Workers will receive checklist of pertinent contacts and questions to obtain during the interview • Workers will get practice interviewing through role play • Workers will practice documentation of interviews, and will receive feedback • Child centered collaterals • Other parents/caretakers/paramours • Primary care physician • School • Daycare • DCFS prior Investigators/Caseworkers		

111 1 0		
Week 3	Allegations #76, #77, #78 Procedures 300 for Allegations will be reviewed Norman certification will be reviewed and how to access funding Housing Assistance will be reviewed Home safety Checklist review and how to use and document. Photos of environmental concerns How to close reports Closing CERAPs Analyzing gathered evidence Final Supervision session Writing Rationales - Workers will learn what exculpatory and inculpatory evidence is and how to write the allegation page and rationale	
Week 4	Learning Procedures 300: Focus on Allegations #74 and #82 Presenter will review Procedures for Allegations #74 and #82 Workers will learn how to write a rationale for these allegations	
Week 5	GAL REVIEW and DUPUY CASES How to "read" a CPS caseload and prioritize the work for closure GAL Review Process and time-frames. DUPUY Process and Policy review and time-frames.	
Week 6	The Process of Completing Protective Custody and Fictive Kin Placements PSA will go over the decision making process behind Protective Custody (the evidence needed, urgent and immediate necessity, probable cause and reasonable efforts) Workers will learn the required forms needed for Traditional foster placement and relative placement Workers will learn about Fictive Kin and the paperwork needed for this Family Finding Diligent Searches Hand-off and Transition Initial Visit Plan Completion Required Court Activities	

Week 7	Allegation #60: Exculpatory and Inculpatory Evidence Office of Legal Services (Beth Solomon or Meryl Paniak)/ Trainer will review Allegation #60 and what evidence and factors are needed to make a recommended indicated finding Blatant Disregard — Precautionary Measures taken Reasonable Person Criteria Workers will learn what exculpatory and inculpatory evidence is and how to write the allegation page and rationale Specialty Services Review: DV, MH and Substance Abuse	
Mook 9	Making Interest Policy of	
Week 8	Review of procedure Cases for intact and exceptions Hand-offs and transitions	
Week 9	Allegation #11: Cuts, Bruises, Welts, Abrasions, and Oral Injuries (Abuse) - Documenting evidence of injuries on a child Procedures 300 for Allegation #11 will be reviewed Workers will be trained on required forms and protocols for allegation #11, including Cants 2B, Cants 65A and taking photos of injuries Reminder of child centered collaterals Specialty medical team referrals (MPEEC, MERIT, PRC and Children's Resource Network)	
Week 10	Review of allegation and procedures relating to lock outs Review of CCBYS program Review of psychiatric lockout issues and resources Review of Post-Adopt support for disrupted adoptions Workers will learn what exculpatory and inculpatory evidence is and how to write the allegation page and rationale	

Week 11	Allegations #6, #10 and #12	
	 How to "read" a CPS caseload and prioritize 	
	the work for closure	
	Presenter will review Procedures for	
	Allegations #6, #10 and #12	
	 Workers will learn how to write a rationale 	
	for these allegations	
Week 12	Introduction to Sex Abuse Allegations	
	Presenter will review Procedures for sex	
	abuse allegations	
	 Workers will learn how to write a rationale 	
	for these allegations	
	Review of medical consult processes, multi-	
	disciplinary teams and utilization of Child	
	Advocacy Centers	
	Review local office CAC protocols	
	Working with law enforcement and states	
	attorney	
	Collection of evidence related to sex abuse	
	allegations	
	Specialty medical team referrals (MPEEC,	
	MERIT, PRC and Children's Resource	
	Network)	
	Network)	
Week 13	Allegation #79: Medical Neglect	
	 Presenter will review Procedures for 	
	Medical Neglect	
	 Workers will learn how to write a rationale, 	
	and how to weigh expert evidence in the	
	determination of a finding	
	 Review of medical consult processes, who to 	
	call, who to talk to, and why	
	The need to gather medical documentation	
	and importance of placing it in the hard copy	
	record	
	How to review medical records, who did	
	what and what each of their roles are (ER	
	doctor verses primary care doctor, pediatric	
	endocrinologist)	
	endocimologist/	

	Local Field Training:	
Week 14:	Topic: To be determined by the Intern and Supervisor, otherwise - • Subsequent Oral Reports • Reinforce special consideration for children age 6 or younger • Reinforce medical requirements for reports of child abuse and neglect	Presenter:
Week 15:	Topic: Special Investigations Facilities Employees Schools Daycares Juvenile Detention Death cases	Presenter:
Week 16:	Topic: To be determined by the Intern and Supervisor, otherwise - Reinforce Reinforce assessment of factors and evidence to determine a final finding Reinforce scene investigation and timeline CANTS 65A Reinforce Blatant Disregard/Precautionary Measures Reasonable person criteria Practice writing inculpatory and exculpatory factors	Presenter:

KEY	
Columns	Notes
Region/Sub-	The team where the worker has the highest number of newly assigned investigations* for the year. I
Worker on > 1 Team	True if the worker's newly assigned investigations* for the year is from more than one team. False if
CY Total All	The number of newly assigned investigations* for the year for the worker on any team.
CY Total Team	The number of newly assigned investigations* for the year for the worker for the displayed team.
Month Total All	The number of newly assigned investigations* for the month for the worker on any team.
Month Total Team	The number of newly assigned investigations* for the month for the worker for the displayed team.
*Newly Assigned	The first worker to hold a primary assignment for the investigation for either 24 or 72 hours - see rep
**Monthly Assessment	Total for Month All Teams number will had conditional formatting applied per the rules below:
	1. This month, the number of newly assigned investigations is > 15
	2. This month, the number of newly assigned investigations is > 12 and <= 15 for the fourth or more
REPORT NAME:	Newly Assigned Investigation Reports (72 Hours)
CALENDAR YEAR:	2017 From January through June

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Design	Sub-Region	Team	SupervisorName	Worker on > 1 Team	RSF W	forkerName	CY Total All	CY Total Team	Jan. Total All. Jan. Tol	tal Team	Feb. Total All Feb. Total Team	Mar. Total A	II Mar. Total Team	Apr. Total All Apr.	Total Team	May Total All May Total Te	am Jun	t. Total All. Jun. Total T	Team
Region Central Region	Champaign	BLOOMINGTON PAIRED TEAM 3508		FALSE	3B 08		85	88	14	14	6 6	1	4 14	15	15	20	20	16	18
Central Region	Champaign	BLOOMINGTON PAIRED TEAM 3688		FALSE	38 08		46	46	12	12	19 15	1	5 15 4 14	16	9,	0 14	14	12	12
Central Region	Champaign	BLOOMINGTON PAIRED TEAM 3608		TRUE	3B 08		79	62	12	.0	11 6	1	9 19	13	13	14	14	8	8
Central Region	Chempaign	DECATUR INVESTIGATION 3645		FALSE	3B 45		78 74	78 74	11 14	- 11	12 12		6 16	12	12	7	7	13	13
Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE FALSE	38 45 38 45		73	73	13	13	10 10	. i	9 19	11	11	17	17	3	3
Central Region	Champaign	DECATUR INVESTIGATION 3645 DECATUR INVESTIGATION 3645		FALSE	38 45		36	36	0	o	0 6	0	0 0	10	10	14	14	12	12
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Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE	38 45		75	76	13	13	12 12	2	16	10	10	1\$ 15	15	13	.3
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 38 82	2	FALSE	38 62		87	87	14	14	18 11		12 12	15 15	13	15	19	9	'.
Central Region	Chempeign	Investigations / Central / Bloomington / Pontrac 38 63		FALSE	3B 82		88	88	15	13	16 16		0 9	18	15	13	13	16	16
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 38 82		FALSE	3B 82		76	75	16	16	18 19	6	14 14	19	19	16	16	17	17
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 39 83		FALSE FALSE	3B 82 3B 82		103	103	19	19	17 1	7	16 16	15	15	21	21	15	15
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 38 82	6	FALSE	38 85		46	44	11	11	15 1	5	9 9	11	11	0	0	0	0
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Central Region	Champaign	Investigations / Central / Bloomington 3B 85		FALSE	38 85		32	32	0	0	0	0	0 0	.0	0	15	15	17 17	17
Central Region	Peoria	Investigations / Central / Canton 18 19		FALSE	18 19		79	79	12	12	12 1	2	12 13	1 !!	111	15 17	15	13	13
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Central Region	Springfield	Investigations / Central / Carlinville 3A 08		FALSE	3A 08		29	29	8	8	9	9	7 7	5	5	0	0	0	٥
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Central Region	Champaign	Investigations / Central / Charleston / Decatur 3B84		FALSE	3B 84		83	93	16	18	14 1	4	24 24	10	10	13	13	0	
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Central Region	Champaign	Investigations / Central / Charleston / Decatur 3B84		FALSE	38 84		80	80 58	12 8	14	10	-1	21 2	1 15	15	16	16	16	0
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Central Region	Champaign	Investigations / Central / Charleston 3804		FALSE	3B 04		97	97	19	19	9	9	20 21	22	22	10	10	17	17
Central Region	Champaigh	Investigations / Central / Charleston 3804 Investigations / Central / Charleston 3804		TRUE	38 04		62	68	18	18	9	9	3	1	0	22	22	9	9
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Central Region	Champaign	Investigations / Central / Charleston 3504		FALSE	3B 04		2	2	0	0	1	1	1	1 0	0	0	.0	0	.0
Central Region	Champaign	Investigations / Central / Danville / Watseka 3983		FALSE	38 83		84	84	12	12	14 1	14	18 1	17	17	10	10	13 10	13
Central Region	Champeign	Investigations / Central / Danville / Watseka 3863		FALSE	38 83		85	0.5	14	14	13 1	13	12 1	18	18	18	18	50	101
Central Region	Champaign	Investigations / Central / Danville / Watseka 3B83		FALSE	3B 83		67	67	7		8		9	11	11	16	15	11	11
Central Region	Champaign	Investigations / Central / Danville / Watseka 3863		FALSE	3B 63		87	67	11	11	15 1	2	0	ál 'á	0	1 %	١	7	7
Central Region	Champaign	Investigations / Central / Danville 3D 03		FALSE	3B 03		7				"	ä	14 1		0	12	12	14	14
Central Region	Champaign	Investigations / Central / Danville 38 03		FALSE	3B 03		80	83	15	15	1 10 1	.ől	19 1	15	15	14	14	10	10
Central Region	Champaigh	Investigations / Central / Danville 3B 03		FALSE FALSE	38 03 38 03		99	96	11	11	16	16	20 2	19	19	16	16	14	14
Central Region	Champaign	Investigations / Central / Danville 3B 03		FALSE	38 03		83	83	13	13	12 1	12	13 1	3 18	18	14	14	13	13
Central Region	Chempaign	Investigations / Central / Danville 3B 03 Investigations / Central / Decatur 3B86		FALSE	38 86		77	77	14	14	11 1	11]	20 2	0 11	11	11	11	10	10
Central Region Central Region	Champaign Champaign	Investigations / Central / Decatur 3886		FALSE	38 86		78	78	12	12	11 1	11	18 1	8 17	17	12	12	8	8
Central Region	Champaign	Investigations / Central / Decatur 3686		FALSE	3B 86		73	73	13	13	12 1	12	14 1	4 11	11	8	.8	15	15
Central Region	Champaign	Investigations / Central / Decatur 3886		FALSE	38 86		73	73	15	15	14 1	14	15 1	5 10	10	12	33	4	<u> </u>
Central Region	Champaign	Investigations / Central / Decatur 3888		FALSE	3B 86		36	36	9	9	1 9	5	0		0	13	13	0.0	10
Central Region	Champaign	Investigations / Central / Decalur 3B86		FALSE	3B 86		10	10	0 15	10	12	.31	18 1	8 12	12	22	22	14	14
Central Region	Peona	Investigations / Central / Galesburg 18 22		FALSE	18 22		92	92	10	10	1 '6	'a	n .	10	10	15	15	20	20
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Central Region	Peona	Investigations / Central / Galesburg 18 22		FALSE FALSE	18 22 18 22		60	80	15	15	12	12	15 1	5 12	12	13	13	13	13
Central Region	Peona	Investigations / Central / Gatesburg 18 22		FALSE	18 22		80	80	16	16	9	9	12 1	2 11	11	18	18	14	14
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Central Region	Springheld	Investigations / Central / Jacksonville 3A21		FALSE	3A 21		72	72	13	13	11 11	1]	11 1	17	17	47	,2	11	
Central Region	Springheld	Investigations / Central / Jacksonville 3A21		FALSE	3A 21		64	84	9	9	6	6	9	9 14	14	17	17	10	70
Central Region	Springheld	Investigations / Central / Jacksonville 3A21		FALSE	3A 21		62	62	10	10	0	8	10 1	13	10	13	13	9	i i
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06		FALSE	3A 06		58	44			12	'5		1 10			اه	0	o
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A05		FALSE	3A 05		4				14	14	15 1	5 12	12	7	7	4	4
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Central Region	Peoria	Investigations / Central / Ottawa Team 1829		FALSE FALSE	18 29 18 29		67	61	10	10	6	6	8	8 11	11	a a	6	12	12
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Central Region	Peoria Peoria	Investigations / Central / Ottawa Team 1829		FALSE	18 29		73	73	13	13	11	11	14 1	4 13	13	11	11	11	11
Central Region Central Region	Peona	Investigations / Central / Ottawa Team 1832		TRUÉ	18 32		32	21	7	7	0	0]	3	0 0		9	9	5	5
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Central Region	Peone	Investigations / Central / Ottawa Team 1832		FALSE	18 32		64	64	13	13		12	9	9 14	14	2	,	13	13
Central Region	Peons	Investigations / Central / Ottawa Team 1832		FALSE	1B 32		58	68	9	1		10	11 1	7			3		'3
Central Region	Peons	Investigations / Central / Ottaws Team 1832		FALSE	1B 32		27	21	9	- 1	6		11 1		,	1,1	14	13	13
Central Region	Peona	Investigations / Central / Ottawa Team 1832		FALSE	1B 32		67	67	13	17	9	3	0			14	14	10	10
Central Region	Peona	Investigations / Central / Peoria 18 12		FALSE	16 12		26	21	0	- 1		13		0		i	0	0	0
Central Region	Peona	Investigations / Central / Peoria 18 12		FALSE	18 12		38		15 13	10		10	10	19	19	14	14	7	7
Central Region	Peona	Investigations / Central / Peoria 18 12		FALSE	10 12		73 95	73	15	14		10		3 22	22	19	19	15	16
Central Region	Peona	Investigations / Central / Peorse 18 12		FALSE FALSE	18 12 18 12		22	22		,	i i	0	0	0 0	-	7	7	15	15
Central Region	Peona	investigations / Central / Peona 18 12		FALSE	1B 30 .		· "6		ŏ		6	0	0	0 4		1	1	0	0
Central Region	Peona	Investigations / Central / Peons Team 1B 30		FREGE	,5 40	73	_				•								

KEY	
Columns	Notes
Region/Sub-	The team where the worker has the highest number of newly assigned investigations* for the year. I
Worker on > 1 Team	True if the worker's newly assigned investigations* for the year is from more than one team. False if
CY Total All	The number of newly assigned investigations* for the year for the worker on any team.
CY Total Team	The number of newly assigned investigations* for the year for the worker for the displayed team.
Month Total All	The number of newly assigned investigations* for the month for the worker on any team.
Month Total Team	The number of newly assigned investigations* for the month for the worker for the displayed team.
*Newly Assigned	The first worker to hold a primary assignment for the investigation for either 24 or 72 hours - see rep
**Monthly Assessment	Total for Month All Teams number will had conditional formatting applied per the rules below:
	1. This month, the number of newly assigned investigations is > 15
	2. This month, the number of newly assigned investigations is > 12 and <= 15 for the fourth or more
REPORT NAME:	Newly Assigned Investigation Reports (24 Hours)
CALENDAR YEAR:	2017 From January through June

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 129 of 179 PageID #:3606

Region	Sub-Region	Team	SupervisorName Wort	iet on > 1 Tea	m RSF WorkerName	CY Total Alt C	Y Total Team	Jan. Total All Jan. Total Te	Team	Feb. Total All Feb. Total Team	Mar. Total All Mar. Total Team	Apr. Total All Apr. Total Team	May Total All May Total Team	Jun. Total All Jun. Total Team
Central Region	Champeign	BLOOMINGTON PAIRED TEAM 3508		FALSE	38 00	87	87	15	15	7 7	13 13	16 16	20 20	0 0
Central Region	Champaign	BLOOMINGTON PAIRED TEAM 3505		FALSE	3B 08	60	50	13	13	21 21	16 16 14 14	17 17	15 15	12 4 12
Central Region	Champeign	BLOOMINGTON PAIRED TEAM 3508		TRUE	38 08 38 45	81 79	64 79	12 11	11	11 6 14 14	19 11	13 13	14 14	8 8
Central Region Central Region	Champaign Champaign	DECATUR INVESTIGATION 3645 DECATUR INVESTIGATION 3645		FALSE	39 45	74	74	14	14	12 12	16 16	12 12	7 7	13 13
Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE	3B 45	71	71	13	13	10 10	18 18	11 11	16 16	3 3
Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE	3B 45	35	35	0	0	0 0	0	10 10	14 14	
Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE	3B 45	32	32	0 13	0	12 12	10 1	10 10	15 15	
Central Region	Champaign	DECATUR INVESTIGATION 3645		FALSE	3B 45 3B 82	74 87	74	14	14	18 18	12 1	15 15	15 15	10 10
Central Region	Champaign	Investigations / Central / Bloomington / Pontac 38 82		FALSE	3B 82	87	87	14	14	16 16	14 1	15 15	19 11	9 9
Central Region Central Region	Champaign Champaign	Investigations / Central / Bloomington / Portiac 3B 82 Investigations / Central / Bloomington / Portiac 3B 82		FALSE	3B 82	75	76	j ,	3	16 18	9 9	16 18	13 1	16 16
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 3B 82		FALSE	3B 82	19	99	16	15	16 16	14 14	19 19	71 72	1 "1 (1)
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 3B 82		FALSE	38 82	102	102	19	19	16 16 15 15	16 1	15 17	1 2	
Central Region	Champaign	Investigations / Central / Bloomington 3B 85		FALSE	3B 65	46	76	11 13	13	13 13	12 1	13 13	19 11	5 5
Central Region	Champaign	Investigations / Central / Bloomington 3B 85		FALSE FALSE	3B 85 3B 85	76 33	33	0	ő	0 0	0	0 0	15 1	18 18
Central Region Central Region	Champaign Peons	Investigations / Central / Bloomington 3B 85 Investigations / Central / Canton 1B 19		FALSE	18 19	77	77	12	12	10 10	12 1	2 11 11	15 1	17 17
Central Region	Peoria	Investigations / Central / Canton 18 19		FALSE	18 19	74	74	9	9	9	11 1	14 14	17 1	7 14 14 5 17 17
Central Region	Peoria	Investigations / Central / Canton 18 19		FALSE	19 19	80	80	16	16	8	13 1	10 10	13 1	13 13
Central Region	Peorta	Investigations / Central / Canton 18 19		FALSE	1B 19	33	33	0	0	D 0	12 1	, ,	1 2	
Central Region	Springheld	trivestigations / Central / Carlinville 3A 08		FALSE	3A 08	49	49	14	14	10 10	1 12 1	11 11	15 1	5 18 18
Central Region	Springfield	Investigations / Central / Carlinville 3A 98		FALSE	3A 08 3A 08	81 29	81	13	13	9 9	'7	7 5 5	0	0 0
Central Region	Springfield	Investigations / Central / Carinville 3A 08		FALSE FALSE	3A 08	45	40	o o	اه	0 0	0	0 6 6	17 1	7 15 15
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Central Region Central Region	Spinigheld Spinigheld	Investigations / Central / Carlinville 3A 08		FALSE	3A 08	35	36	0	D	0 0	0	9 9	15 1	5 11 11
Central Region	Springfield	Investigations / Central / Cartinville 3A 08		FALSE	3A 08	71	71	12	12	14 14	0	11 11	14 1	12 12
Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884		FALSE	3B 84	2	2	2	2	0 0	D 24 2	4 16 19	1 15 1	5 10 10
Central Region	Champaign	Investigations / Central / Charleston / Decatus 3864		FALSE	38 84	**	96	16	18	14 14	18 1	a 16 16	17 1	7 15 15
Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884		FALSE	38 84 38 84	**	113	14	14	14 14	20 2	0 14 14	12 1	2 15 15
Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884 Investigations / Central / Charleston / Decatur 3884	F700	TRUE	38 84	8.0	69	7	0	11 5	21 2	1 16 16	17 1	7 16 이
Central Region Central Region	Champaign Champaign	Investigations / Central / Charleston 3B04	1.5	TRUE	39 04	68	60	11	11	23 23	15 1	5 2	0	0 16 18
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Central Region	Champaign	Investigations / Central / Charleston 3804		TRUE	38 04	68	63	19	19	10 9	1 5	2 1	1 4	
Central Region	Champaign	Investigations / Central / Charleston 3B04		FALSE	38 04	35	3.5	13	13	13 13 15 15	10 1	9 15 19	5 18 1	8 13 13
Central Region	Champaign	Investigations / Central / Charleston 3804		FALSE	38 04	97	97	17	1/	15 15	1 1	1 0	0 0	0 0
Central Region	Champaign	Investigations / Central / Charleston 3804		FALSE	39 04 39 83	84	84	12	12	15 15	17	7 17 1	7 10 1	0 13 13
Central Region Central Region	Champaign	Investigations / Central / Denville / Watseka 3883 Investigations / Central / Darwille / Watseka 3883		FALSE	38 83	- 46	86	14	14	13 13	13 1	3 17 1	7 18 1	8 10 10
Central Region	Champaign Champaign	Investigations / Central / Danville / Watseta 3883		FALSE	38 83	67	67	7	7	6 6	9	9 11 1	1 15	5 9
Central Region	Champaign	Investigations / Central / Danville / Watseks 3883		FALSE	3B 83	87	67	11	11	15 15	17 1	7 17 1	7 16	0 5 6
Central Region	Champaign	Investigations / Central / Danville 38 03		FALSE	38 03	6	6	0	0	0 0			0 12	15 15
Central Regron	Champaign	Investigations / Central / Danville 3B 03		FALSE	3B 03	54	56	8 15	15	10 10	10	15 1	5 14	14 10 10
Central Region	Champaign	Investigations / Central / Darrville 3B 03		FALSE	3B 03 3B 03	83	93	13	13	16 16	20	19 1	9 16	16 14 14
Central Region	Champaign	Investigations / Central / Danville 3B 03		FALSE FALSE	38 03	1	1	0	0	0 0	0	0	0	0 1 1
Central Region Central Region	Champeign Champeign	Investigations / Central / Danville 3B 03 Investigations / Central / Danville 3B 03		FALSE	3B 03	83	83	13	13	12 12	13	13 18 1	8 14	13 13
Central Region	Champaign	Investigations / Central / Decatur 3B86		FALSE	3B 86	76	76	14	14	11 11	20	10 1	11	10 10
Central Region	Champeign	Investigations / Central / Decatur 3886		FALSE	3B 86	79	79	12	12	11 11	18	18 18 1	1 8	A 15 15
Central Region	Champaign	Investigations / Central / Decatur 3B86		FALSE	38 86	73	73	13 15	13	12 12	15	10 1	0 12	7 7
Central Region	Champaign	Investigations / Central / Decatur 3886		FALSE	38 86	73	73	13	13	6 6	0	0 0	0 14	14 9 9
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Central Region	Peona	Investigations / Central / Galesburg 18 22		FALSE	16 22	94	94	16	18	12 12	16	13 1	22	22 15 15 15 15 20 20
Central Region	Респа	Investigations / Central / Galesburg 1B 22		FALSE	18 22	45	45	0	0	0 0	0	15 12 1	13	13 13 13
Central Region	Peona	Investigations / Central / Galesburg 18 22		FALSE	18 22	80	80	15 16	13	12 12	15	12 11 1	19	19 14 14
Central Region	Peona	Investigations / Central / Galesburg 18 22		FALSE	18 22 18 22	81 12	81	ρ D	0	0 6	o o	0	0 0	0 12 12
Central Region	Peoria	Investigations / Central / Galesburg 18 22		FALSE	3A 21	69	59	12	12	13 13	14	14 9	9 13	13 8 8
Central Region Central Region	Springfield Springfield	Investigations / Central / Jacksonville 3A21 Investigations / Central / Jacksonville 3A21		TRUE	3A 21	73	72	10	to:	10	16	18 12 1	12 16	16 7 7
Central Region	Springfield	Investigations / Central / Jacksonville 3A21		FALSE	3A 21	73	73	12	12	11 11	1 12	12 17 1	10	10 11 11
Central Region	Springfield	Investigations / Central / Jacksonville 3A21		FALSE	3A 21	46	65	9	9	6 6	9	9 14 1	18	16 9 9
Central Region	Springheld	Investigations / Central / Jacksonville 3A21		FALSE	3A 21	84	84	11	11	6 6	5] 9	10 10 1	15	5 9 9
Central Region	Springheld	Investigations / Central / Lincoln / Taylorville 3A06		FALSE	3A 08	70	70		7	13 1.	3 19	0 0	0	0 0
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06		FALSE	3A 06	4	47	14	14	14 14	17	17 12 1	7	7 3 3
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06		FALSE FALSE	3A 06 1B 29	67	67	10	10	13 1	12	12 14 1	15	15 3 3
Central Region Central Region	Peona Peona	Investigations / Central / Ottawa Team 1829 Investigations / Central / Ottawa Team 1829		FALSE	18 29		69	13	13	12 13		11 7	7 15	15 11 11
Central Region	Peoria	Investigations / Central / Ottawa Team 1829		FALSE	18 29	73	73	13	13	11 1	1 ''	17	11	11 11 11 7 12 12
Central Region	Peona	Investigations / Central / Ottawa Teem 1829		FALSE	18 29	54	56	11	11	6	8	9 11 1	11 7	7, 12 12 15 11 11
Central Region	Peone	Investigations / Central / Otlawa Team 1829		FALSE	1B 29	67	67	6	0	13 1:	3 9 0 3	0 8	8 9	9 5 5
Central Region	Реопа	Investigations / Central / Ottawa Team 1832		TRUE	19 32	32	29	7 14	14	9 1	8 8	8 8	8 15	15 14 14
Central Region	Peona	Investigations / Central / Ottawa Team 1832		FALSE	1B 32 1B 32	68 64	64	13	13	12 1	2 9	7	14 B	9 7 7
Central Region	Peona	Investigations / Central / Ottawa Team 1832		FALSE FALSE	19 32 19 32	64 68	68	9	9	10 1	0 11	11 7	7- 8	8 13 13
Central Region Central Region	Peona Peona	Investigations / Central / Ottawa Team 1932 Investigations / Central / Ottawa Team 1932		FALSE	1B 32	28	28	9	9	6	6 0	0 10	10	2 1 1
Central Region	Peona	Investigations / Central / Ottawa Team 1832		FALSE	19 32	67	67	13	13	9		12 6	6 14	14 13 13
Central Region	Peorta	Investigations / Central / Peoria 1B 12		FALSE	19 12	38	38	15	15	13 1		0 0	0 0 2	0 0 0
Central Region	Peoria	Investigations / Central / Peona 1B 12		FALSE	1B 12	27	27	0	13	0 1	0 0	10 19	19 14	14 7 7
Central Region	Peorta	Investigations / Central / Peona 18 12		FALSE	1B 12	73	73	13	13	10 1	·	.,		

Exhibit N

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 131 of 179 PageID #:3608

Heidi Dalenberg

From: Greenspan, Barbara <Barbara.Greenspan@illinois.gov>

Sent: Friday, August 11, 2017 6:36 PM

To: Heidi Dalenberg; Claire Stewart (cstewart@aclu-il.org); Ben Wolf

Cc: Spacapan, Lise; Solomon, Beth

Subject: BH - Caseloads

Attachments: Memorandum of Agreement-Deferred Assignment Caseloads_8_11_2017.pdf

Following up on our discussion related to caseloads, attached is the agreement reached today to fill Deferred Assignment Investigators downstate, similar to the agreement reached with Cook County last month.

Barbara L. Greenspan
Assistant Attorney General
Chief, Child Welfare Litigation Bureau
100 W. Randolph, Suite 11-200

Chicago, Illinois 60601

Phone: 312/814-7087; Fax: 312/814-6885

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MEMORANDUM OF AGREEMENT Deferred Assignment Investigations

The Department of Children and Family Services (DCFS) and the American Federation of State, County and Municipal Employees (Union) agree to the below noted terms in an effort to hire, train, and have Child Protection Specialists (CPS) immediately available to be assigned to vacant positions after Article XIX bidding contractual rights have been exhausted, i.e. "other means." This agreement applies to the Northern, Central and Southern DCFS Regions. It does not apply to Cook County:

- In the Northern, Central and Southern Regions combined, up to 30 Child Protection Specialists can be hired from an open competitive eligible list without posting. The hires will have the working title of "Deferred Assignment Investigator" (DAI). The DAI's will be hired in or near offices that have experienced difficulty maintaining appropriate headcount based upon a specific maximum number of DAI's per Sub-Region agreed to by the Standing Committee.
- The DAI positions will be assigned to a particular worksite. After successfully
 completing Foundations Training, DAI's will be assigned investigations based on
 the worksite's case assignment protocol. DAI's shall not be detailed during their
 probationary period.
- DAI's will officially report to an Area Administrator who will be responsible for assigning the DAI's to a supervisor for day-to-day assignments and supervision. The Area Administrators shall endeavor to limit the number of different supervisors giving assignments to the DAI's for continuity of supervision purposes during the DAI's probationary period.
- 4. The intent of the DAI is to be a temporary position until a vacancy becomes available at "other means" and not a permanent employment placement.
- 5. As CPS positions become vacant they will be posted for bid in accordance with Article XIX. Once contractual rights have been exhausted and the vacancy is at "other means", a DAI will be agency-directed job assigned to the position that is within the DAI's county. The assignment will be based upon DAI seniority (if needed, tie-break random number). If no vacancy exists within the DAI's assigned county within three (3) months of hire, the DAI may be assigned to a CPS vacancy at "other means" within the Sub-Region and no additional DAI within the Sub-Region will be filled without agreement from a committee that includes AFSCME, the Sub-Region's designated Standing Committee member(s), Operations management and Office of Employee Services.
- 6. The agency-directed job assignment shall not renew the probationary period; rather, the probationary period shall resume including the time spent in the DAI assignment. DAI employees must accept the agency-directed job assignment. Failure to do so may result in probationary discharge due to the intent of the DAI assignment addressed in #4 above.
- 7. DCFS shall notify the Union upon assignment of a DAI to a permanent CPS.

- 8. As the number of DAI positions is reduced by being assigned to permanent CPS, DCFS shall hire additional DAI positions to maintain up to 30 under the conditions described in #1 above. The new DAI's will be assigned to permanent CPS positions consistent with the process described above.
- DCFS and the Union shall meet to discuss this agreement no later than three (3)
 months after its signing. Either party may request to meet sooner for discussions,
 which will not be unreasonably denied.
- 10. This agreement is entered into without precedent or prejudice and may not be utilized in any subsequent proceeding except for the enforcement of its terms.

For the Employer

Dated: <u>\$-//-/7</u>

For the Union

Dated: 8/0/17

Exhibit O

From: Dcfs.DocumentTransferSystem@illinois.gov

Sent: Thursday, September 7, 2017 4:10 PM

To: Heidi Dalenberg

Cc: beth.solomon@illinois.gov

Subject: DCFS Document Transfer System - Dropbox Upload Notification

Attachments: ATT00001









Document Transfer System

Document Transfer System

The following file(s) have been placed in your dropbox by beth.solomon@illinois.gov

File	Expiration
Caseloads BH Stats 24 Hours 2017-09-05-11-18 for Plaintiffs' Counsel.xls	10/07/2017
Caseloads BH Stats 72 Hours 2017-09-05 for Plaintiffs' Counsel.xls	10/07/2017

You may access your drop box at My Dropbox

If this is the first time you have used the Document Transfer System please register your email address at Register

After registering your email you will receive an email containing a link to establish your initial password.

Once your email has been registered and password established refer to drop box link above.

This message was delivered by an automated system and does not come from a monitored email address. Please do not reply to this email message.

If you require assistance, please contact the DCFS OITS Helpdesk by email at <u>Helpdesk.OITS@illinois.gov</u> or by phone at 1-800-610-2089

From: Solomon, Beth <Beth.Solomon@illinois.gov>

Sent: Monday, September 11, 2017 3:44 PM **To:** Heidi Dalenberg; Greenspan, Barbara

Cc: Claire Stewart; Ahern, Janet

Subject: RE: Caseloads

Heidi: I hope this helps. The two reports are Newly Assigned Cases 24 hours and Newly Assigned Cases 72 hours and contain generally the same information. The Newly Assigned cases 24 hours shows those cases newly assigned to an investigator that are in the investigator's name for 24 hours and the Newly Assigned cases 72 hours shows those cases newly assigned to an investigator that are in the investigator's name for 72 hours. They are the same report and the only difference is the hours -- the reason for the two reports is that one investigator might work on the weekends or after hours and get a newly assigned case and do some work on the case -- go out to see the child and assess the child's safety and do some preliminary investigative tasks -- but then the case will be transferred to another investigator to be assigned as the primary investigator to complete the investigation.

For example, Susie may have worked an afterhours shift one month and has a case during which she met the mandate and then the case was transferred to John as the primary investigator. For the Newly Assigned Cases 24 hour report, Susie may have 12 newly assigned cases and John may have 10 newly assigned cases. However, after the initial activities, the case was transferred to John as the primary investigator. For the Newly Assigned Cases 72 hours, Susie will show 11 newly assigned cases and John will show 11 newly assigned cases.

The Child Protection Division is looking at both reports as management tools, but if you want to look at only one report, then I suggest the Newly Assigned Cases 72 hours as that will the case as assigned to the investigator who is primarily assigned to complete the investigation.

The total investigations assigned are contained under the column CY total all, which is the number of newly assigned investigations for the year for the worker for any team on which they have received assignments. This was included to cover situations where an investigator transfers from one team to another team in a calendar year.

We have an agreement with the union for Deferred Assignment Investigators for Central, Northern and Southern regions, which we forwarded to you on August 11, 2017 and which we are incorporating into a revised Plan on Investigative Caseloads.

I have included a key at the beginning of both reports that will explain the columns:

Columns	Notes
Worker on > 1 Team Indicator	True if the worker's newly assigned investigations* for the year is from more than
Region/Sub-Region/Team/Supervisor/RSF	The team where the worker has the highest number of newly assigned investiga
CY Total All	The number of newly assigned investigations* for the year for the worker on any
CY Total Team	The number of newly assigned investigations* for the year for the worker for the
Month Total All	The number of newly assigned investigations* for the month for the worker on ai
Month Total Team	The number of newly assigned investigations* for the month for the worker for the
*Newly Assigned Investigations First Primary Assign.	The first worker to hold a primary assignment for the investigation for either 24 c

Beth I. Solomon
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(312) 814-2401 (main)
Beth.Solomon@illinois.gov

From: Heidi Dalenberg [mailto:hdalenberg@rshc-law.com]

Sent: Friday, September 8, 2017 2:42 PM

To: Greenspan, Barbara

Cc: Claire Stewart; Solomon, Beth **Subject:** [External] RE: Caseloads

I would appreciate an update on Monday.

Please note that the second sheet in the spreadsheets already sent does contain a key that gives some information but the key does not answer my questions. I don't understand if there is duplication across both sheets, or where one looks to see the TOTAL investigations assigned (whether 72 hours, 24 hours, or whatever else) to the worker. The Decree does not differentiate between short-term and long-term "new assignments." All assignments count.

I would also note that even with my confusion, it looks to me like there is insufficient support being given to some offices to address the understaffing problem.

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From: Greenspan, Barbara [mailto:Barbara.Greenspan@illinois.gov]

Sent: Friday, September 8, 2017 2:37 PM

To: Heidi Dalenberg < hdalenberg@rshc-law.com >

Cc: Claire Stewart < cstewart@ACLU-il.org >; Solomon, Beth < Beth.Solomon@illinois.gov >

Subject: RE: Caseloads

Heidi – Beth will get you a new report with the key and an explanation of the 24 versus 72 hour over the weekend.

Exhibit P

From: Heidi Dalenberg

Sent: Thursday, October 12, 2017 4:10 PM

To: Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth Solomon

(Beth.Solomon@illinois.gov); Ahern, Janet

Cc: Claire Stewart

Subject: BH

Counsel – we are not receiving regular reporting as to the investigator caseloads and progress toward hiring / alleviating overburdened workers. Also, I never received a responsive explanation regarding *how* the two reports are being used, or why two reports are being generated that differentiate between individuals who have an investigation for two different timespans.

Please provide updated reports, updated status on hiring / assistance provided to locations where caseloads are too high, and the explanation on reporting that we requested.

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Exhibit Q

From:

Greenspan, Barbara < Barbara. Greenspan@illinois.gov>

Sent: To:

Cc:

Friday, October 20, 2017 2:29 PM Heidi Dalenberg; Claire Stewart Ahern, Janet; Solomon, Beth

Subject:

RE: Caseloads

Attachments:

Caseloads BH Stats 72 Hours 10-2017 for plaintiffs' counsel.xls; Caseloads BH Stats 24

Hours 10-2017 for plaintiffs' counsel.xls

Heidi and Claire:

Attached please find caseload reports for January 2017 through September 2017.

You have asked for an explanation of why a "24 hour report" and a "72 hour report" are both generated and how the reports are used. An explanation was provided to you in an email from Beth Solomon on September 11, 2017 (see below). Please let us know if you have additional questions.

An updated status report on hiring will be provided to you.

Barb

From: Solomon, Beth

Sent: Monday, September 11, 2017 3:44 PM **To:** 'Heidi Dalenberg'; Greenspan, Barbara

Cc: Claire Stewart; Ahern, Janet

Subject: RE: Caseloads

Heidi: I hope this helps. The two reports are Newly Assigned Cases 24 hours and Newly Assigned Cases 72 hours and contain generally the same information. The Newly Assigned cases 24 hours shows those cases newly assigned to an investigator that are in the investigator's name for 24 hours and the Newly Assigned cases 72 hours shows those cases newly assigned to an investigator that are in the investigator's name for 72 hours. They are the same report and the only difference is the hours -- the reason for the two reports is that one investigator might work on the weekends or after hours and get a newly assigned case and do some work on the case – go out to see the child and assess the child's safety and do some preliminary investigative tasks – but then the case will be transferred to another investigator to be assigned as the primary investigator to complete the investigation.

For example, Susie may have worked an afterhours shift one month and has a case during which she met the mandate and then the case was transferred to John as the primary investigator. For the Newly Assigned Cases 24 hour report, Susie may have 12 newly assigned cases and John may have 10 newly assigned cases. However, after the initial activities, the case was transferred to John as the primary investigator. For the Newly Assigned Cases 72 hours, Susie will show 11 newly assigned cases and John will show 11 newly assigned cases.

The Child Protection Division is looking at both reports as management tools, but if you want to look at only one report, then I suggest the Newly Assigned Cases 72 hours as that will the case as assigned to the investigator who is primarily assigned to complete the investigation.

Exhibit R

From: Dcfs.DocumentTransferSystem@illinois.gov

Sent: Tuesday, November 7, 2017 9:35 AM

To: Heidi Dalenberg

Cc: beth.solomon@illinois.gov

Subject: DCFS Document Transfer System - Dropbox Upload Notification

Attachments: ATT00001









Document Transfer System

Document Transfer System

The following file(s) have been placed in your dropbox by beth.solomon@illinois.gov

File File	Expiration
Caseloads BH Stats 72 Hours 2017-09-05 Plaintiffs' Counsel.xlsx	12/07/2017
Caseloads BH Stats 24 Hours 2017-09-05 Plaintiffs' Counsel.xls	12/07/2017
Caseloads BH Stats 72 Hours 2017-10-05-07-39-05.xls	12/07/2017
Caseloads BH Stats 24 Hours 10-2017 for plaintiffs' counsel.xls	12/07/2017
Caseloads BH Stats 72 Hours 2017-11-05 Plaintiffs' Counsel.xls	12/07/2017
Caseloads BH Stats 24 Hours 2017-11-05 Plaintiffs' Counsel.xls	12/07/2017

You may access your drop box at My Dropbox

If this is the first time you have used the Document Transfer System please register your email address at Register

After registering your email you will receive an email containing a link to establish your initial password.

Once your email has been registered and password established refer to drop box link above.

This message was delivered by an automated system and does not come from a monitored email address. Please do not reply to this email message.

If you require assistance, please contact the DCFS OITS Helpdesk by email at <u>Helpdesk.OITS@illinois.gov</u> or by phone at 1-800-610-2089

Exhibit S

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 145 of 179 PageID #:3622

Heidi Dalenberg

From:

Solomon, Beth <Beth.Solomon@illinois.gov>

Sent:

Wednesday, November 8, 2017 3:54 PM

To:

Heidi Dalenberg; 'Claire Stewart'; Greenspan, Barbara; Eddings, Shawn

Subject:

B.H. v. Walker

Attachments:

CPS STaffing update as of 11-8-17.docx; Current Child Protection Details as of

11.1.17.docx

Attached please find, in addition to the B.H. caseload data previously sent to you, an update on child protective service investigator hiring as of 11-8-17 and details of child protection staff.

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Current Child Protection Staffing as of November 8, 2017

As of November 8, 2017 there were 60 Child Protection Service Investigator vacancies statewide

Of the 60 vacancies, 22 of those positions have candidates with identified start dates

Of the 60 vacancies, 38 of those positions are in process of being filled

Breakdown of Child Protection Service Vacancies by Region

Central Region

- 11 CPS vacancies
- 5 Vacancies with start dates or potential candidates identified
 - One child protection investigator starting 11-16-17.
 - One child protection investigator starting 12-01-17 -
 - One child protection investigator starting 01-01-18*
 - Two positions awaiting final approval of candidate
- 6 Vacancies being worked
 - o Four positions have interviews scheduled on 11-13-17
 - o One position have interviews scheduled on 11-14-17
 - One position interviews are being scheduled

Cook Region

- 9 CPS Vacancies
- 5 vacancies with start dates or potential candidates identified
 - o One child protection investigator starting 11-13-17
 - o One child protection investigator starting 11-16-17
 - o Two child protection investigator starting 12-16-17
 - o One child protection investigator starting 1-1-18
- 4 Vacancies being worked (5 posted; 3 to be posted)
 - One child protection investigator position targeted for Deferred Assignment Investigator
 - o Three positions were posted thru 11/17/17

Northern Region

- 37 child protection vacancies
- 10 Vacancies with start dates or potential candidates identified
 - o Four child protection investigators starting on 12-1-17
 - o Two child protection investigators starting on 12-16-17
 - o Three child protection investigator awaiting final approval of candidate
 - One child protection investigator positions targeted for Deferred Assignment Investigator
- 27 Vacancies being worked

- o Three positions posted thru 11/13/17
- Six positions had interviews conducted 11-2 & 3-17 making offers to candidates
- o Four positions requesting Eligibility List from Central Management Services
- o Two positions working the bid records from the positions being posted
- o 8 positions recruiting for bilingual candidates

Southern Region

- 3 child protection investigator vacancies
 - o One child protection investigator starting 11-16-17
 - o One child protection investigator starting 12-1-17
 - o One position posted thru 11/17

Current Child Protection Details as of 11/1/17

Central Region

A number of details were recently completed at the end of October 2017.

One Child Protection Investigator is detailed from Ottawa to Bloomington beginning 11-6-17 for six weeks

One Child Protection Investigator is detailed from Taylorville to the Jerseyville Field for the period of 11-1-17 through 11-17-17

Central Region child protection administration is current working on a detail to the Ottawa field office for the purpose of accepting Ground County investigations for the Joliet field office upon completion of the detail of Southern region staff to the Joliet field office.

Cook Region

Four Child Protection Investigators have been detailed to the Joliet field office

Two Child Protection Investigators have been detailed to the Waukegan field office until early November and the beginning of December

Northern Region

One Child Protection Supervisor has been temporary assigned as the Area Administrator for the Waukegan office beginning October 23, 2017

One Child Protection Supervisor has been temporary assigned duties as a Child Protection Investigator in the Waukegan office until November 6, 32017

Two Child Protection Investigators have been detailed from the Woodstock office to the Waukegan office until the end of November/beginning of December

Two Child Protection Investigators have been detailed from the Dekalb office to the Rockford office ending in the middle/end of November 2017

One Child Protection Investigator from Glen Ellyn has been detailed to the Rockford field office, ending at the end of November 2017

One Child Protection Investigator from the Glen Ellyn office has been detailed to the Joliet office, ending in the middle of November 7, 2017

Southern Region

Four Child Protection Investigators from the Southern Region have been detailed to the Joliet Field Office for four weeks

One Child Protection Investigator has been detailed to the Effingham office for four weeks

Exhibit T

From:

Heidi Dalenberg

Sent:

Thursday, November 9, 2017 10:13 AM

To:

Barbara Greenspan (Barbara.Greenspan@illinois.gov); Beth Solomon

(Beth.Solomon@illinois.gov); Eddings, Shawn; Claire Stewart

Cc:

Claire Stewart: Ben Wolf

Subject:

BH

Counsel – for the hiring data Beth provided yesterday, when a "start date" is given, does that mean the person then begins training? Or is it the date on which the person can begin handling cases? And please confirm the time required to complete training before investigative work can begin.

Further, as I stated to Barb this morning, while Plaintiffs are willing to wait for the Department's communication regarding its willingness to commit to an implementation plan in respect to investigators' caseloads, we are *not* willing to continue the status quo in the meantime. The reports provided show significant, substantial, dangerous, ongoing non-compliance with the caseload limits. Whatever is in place at present is insufficient, and we note that some of the "detailing" previously arranged is about to end or has ended.

We ask that a call be convened to discuss this issue early next week.

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Exhibit U

From:

Heidi Dalenberg

Sent:

Wednesday, November 15, 2017 10:30 AM

To:

Barbara Greenspan (Barbara.Greenspan@illinois.gov); 'Beth Solomon'; Eddings, Shawn

Cc:

Claire Stewart; Ben Wolf; 'Charles Peters'

Subject:

FW: BH

Counsel – We did not receive a response yesterday regarding the message below. Nor did we receive any commitment from the Department, or any communication asking for more time.

The Department's silence ends the negotiation and conferral process. That process has failed. We will file our motion.

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From: Heidi Dalenberg

Sent: Tuesday, November 14, 2017 3:27 PM

To: Barbara Greenspan (Barbara.Greenspan@illinois.gov) <Barbara.Greenspan@illinois.gov>; 'Beth Solomon'

<beth.solomon@illinois.gov>; Eddings, Shawn <Shawn.Eddings@illinois.gov>

Subject: BH

Barb – you agreed that today, you would let us know if the Dept. will give a date certain by which it will either agree to negotiate a plan *for court approval* regarding investigative caseloads or confirm its refusal to do so. When will we hear from you?

Also, we asked for the Department's explanation of what it is doing *now* to address the excessive investigative caseloads aside from the pipeline reforms. I believe we are also still awaiting confirmation of whether the individuals with "start dates" on the hiring lists Beth provided are start dates for the new hires to take cases, or just to begin training (as well as confirmation of the time needed to complete necessary training). Will you please provide that further information?

Heidi Dalenberg Riley Safer Holmes & Cancila LLP Three First National Plaza 70 W. Madison Street, Suite 2900 Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 154 of 179 PageID #:3631

Chicago, Illinois 60602 (312) 471-8730 hdalenberg@rshc-law.com www.rshc-law.com



From: Greenspan, Barbara <Barbara.Greenspan@illinois.gov>

Sent: Wednesday, November 15, 2017 10:32 AM **To:** Heidi Dalenberg; Solomon, Beth; Eddings, Shawn

Cc: Claire Stewart; Ben Wolf; 'Charles Peters'

Subject: RE: BH

I apologize for being unable to respond to you yesterday. I was in a settlement discussion before a Magistrate Judge all afternoon. The Department will respond to the message below by the end of the day Friday, November 17. Again, I apologize for not getting back to you yesterday requesting additional time to respond.

From: Heidi Dalenberg [mailto:hdalenberg@rshc-law.com]

Sent: Wednesday, November 15, 2017 10:30 AM

To: Greenspan, Barbara; Solomon, Beth; Eddings, Shawn

Cc: Claire Stewart; Ben Wolf; 'Charles Peters'

Subject: [External] FW: BH

Counsel – We did not receive a response yesterday regarding the message below. Nor did we receive any commitment from the Department, or any communication asking for more time.

The Department's silence ends the negotiation and conferral process. That process has failed. We will file our motion.

Heidi Dalenberg
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From: Heidi Dalenberg

Sent: Tuesday, November 14, 2017 3:27 PM

To: Barbara Greenspan (Barbara.Greenspan@illinois.gov) < Barbara.Greenspan@illinois.gov>; 'Beth Solomon'

<beth.solomon@illinois.gov>; Eddings, Shawn <Shawn.Eddings@illinois.gov>

Subject: BH

Barb – you agreed that today, you would let us know if the Dept. will give a date certain by which it will either agree to negotiate a plan *for court approval* regarding investigative caseloads or confirm its refusal to do so. When will we hear from you?

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 156 of 179 PageID #:3633

Also, we asked for the Department's explanation of what it is doing *now* to address the excessive investigative caseloads aside from the pipeline reforms. I believe we are also still awaiting confirmation of whether the individuals with "start dates" on the hiring lists Beth provided are start dates for the new hires to take cases, or just to begin training (as well as confirmation of the time needed to complete necessary training). Will you please provide that further information?

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Exhibit V

From:

Heidi Dalenberg

Sent:

Wednesday, November 15, 2017 11:39 AM

To:

Barbara Greenspan (Barbara.Greenspan@illinois.gov); 'Beth Solomon'; Eddings, Shawn

Cc:

Claire Stewart; Ben Wolf; 'Charles Peters'

Subject:

ВН

Barb — While we understand you had other responsibilities yesterday, the Department failed to honor its prior commitment. We are drafting our motion. We will consider whatever the Department chooses to provide on Friday in deciding whether a filing is still needed, but I can assure you that filing will proceed if the Department's response on Friday is anything less than (i) a commitment, in writing, to enter into a court-ordered plan for the investigative caseloads, and (ii) an outline, in writing, of additional steps that the Department is prepared to take *now* to alleviate the overloading problem

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Exhibit W



OFFICE OF THE ATTORNEY GENERAL STATE OF ILLINOIS

Lisa Madigan

November 17, 2017

Sent via email
Heidi Dalenberg
Riley Safer Holmes & Cancila LLP
Three First National Plaza
70 W. Madison
Suite 2900
Chicago, Illinois 60202
hdalenberg@rshc-law.com

Benjamin S. Wolf Claire Stewart Roger Baldwin Foundation of the ACLU, Inc. 180 N. Michigan Ave., Suite 2300 Chicago, IL 60601 312-201-9740 bwolf@aclu-il.org

Re: B.H. v. Walker, 88 C 5599

Dear Counsel:

This letter is in response to your notification pursuant to Paragraph 68(d) of the Decree that the Department is in substantial violation of Paragraph 26(a) of the B.H. Restated Consent Decree and that the Department advise you whether it will agree to negotiate a plan for court approval regarding investigative caseloads. In response to your written request and in light of the parties' subsequent discussions related to the investigative caseloads and the steps the Department has taken with respect to staffing and hiring, the Department does not believe that a court ordered implementation plan is necessary. The Department has provided Plaintiffs with caseload information and the parties have agreed to monthly turnover of this information on the first working day after the fifth of each month. The Department has undertaken a series of activities to bring the investigative caseloads within the ratio set out in the B.H. Restated Consent Decree. The Department will continue to advise you of the status of hiring, in addition to ongoing monthly reporting of investigative caseloads by worker, and the Department is

Heidi Dalenberg

November 17, 2017 Page Two

willing to provide you with regular reporting on its activities since the information changes on a daily basis. Following is a brief description and update on the steps that the Department has taken to hire additional child protection investigators and to accommodate any lag in hiring and assignments.

On July 14, 2017, the Department sent you a letter in response to your correspondence and data requests from June 7, 2017 and July 7, 2017 regarding caseloads for child protection specialists. The Department described its commitment to remediating high caseloads that have occurred in certain isolated areas, including Rockford, Waukegan, Elgin, Aurora, Peoria, Bloomington and Urbana. The Department described its process for streamlining the hiring process to file child protection vacancies. The efforts to streamline the hiring process have been effective, and continue to remain a prime focus of Acting Director Walker and the Department's Office of Employee Services.

On August 3, 2017, the Department provided you with a caseload report that identified newly assigned case assignments for child protection investigative staff as of August 2017 as well as a 2017 Plan to Monitor and Reduce Investigative Caseloads. To date, the Department has received no formal response to the 2017 Plan to Monitor and Reduce Investigative Caseloads. On September 7, 2017, the Department provided you with a caseload report that identified newly assigned case assignments for child protection investigative staff as of September 2017. On November 7, 2017, the Department provided you with a caseload report that identified newly assigned case assignments for child protection investigative staff as of October 2017 as well as resent the August 2017 and September 2017 earlier caseload reports.

As the Department has advised you, the Department has also streamlined the process for hiring by anticipating vacancies and filing positions more quickly. The Department maintains continuous postings for CPS positions in: Waukegan, Rockford, Elgin, Urbana, Mt. Vernon, Peoria, Bloomington, Charleston, Galesburg, Springfield, Danville, Rock Island, Marion, Harrisburg, Freeport and Cook County. When needed, the Department obtains the agreement of AFSCME to maintain postings for internal positions for five days instead of the ten days as set forth in the Master collective bargaining agreement. The Department also exercises its right to backfill vacancies that are created when a CPS moves to another position within the same DCFS office. This process eliminates the timeframe to repost a position when staff move from one team to another within the same office. The Department's Office of Employee Services monitors the status of Central Management Services' grading process for CPS applicants in order to identify any significant delays. The Illinois Department of Central Management Services confirms that it is current on grading of applications for CPS titles.

Hiring of Permanent Child Protection Staff

Director Walker and key management staff in the Office of Employee Services monitor the hiring for child protection investigation staff on a regular basis. As of November 16, 2017,

Heidi Dalenberg

November 17, 2017 Page Three

the Department has approximately 66 child protection specialist vacant positions. Of those vacancies, thirty two positions have identified candidates with start dates. The majority of those vacancies exist in the Northern region and the Department has 15 candidates with start dates for various offices in the Northern region. The Department recently interviewed four candidates for positions in the Rockford office: two candidates accepted the position, one started on November 6, 2017, and the other will start on December 1, 2017. An offer has been extended to and is pending with a third candidate and the fourth candidate declined the position. The Department also hired three child protection investigators for the Waukegan office; one of those positions is being filled by a Deferred Assignment Investigator who is moving into a permanent position. The Department interviewed candidates on November 2, 2017 which provided five viable candidates for positions. The Department hired eight child protection investigator positions for the Joliet field office effective October 16, 2017, five of whom are Deferred Assignment investigators. One Deferred Assignment Investigator is slotted to begin at the Joliet office on November 16, 2017. This leaves only two bilingual child protection investigator vacancies in Joliet.

Deferred Assignment Investigators

In addition, the Department reached an agreement with AFSCME to create a pool of Deferred Assignment Investigators ("DAI") for Cook County office to address staffing and caseloads. Memorandum of Understanding, Cook County Child Protection Deferred Assignment Investigations, dated July 10, 2017, attached to Letter to Counsel dated July 14, 2017, as Exhibit B. The Department has also reached an agreement with AFSCME to create a pool of DAIs for downstate offices. Memorandum of Agreement, Deferred Assignment Investigations, dated August 11, 2017, attached to email to Counsel dated August 11, 2017.

In August, 2017, the DAI pool hiring was implemented in Cook County. As the Department has previously explained, this process permits the Department to hire a pool of external candidates in excess of the number of permanent vacancies available, allowing candidates to be hired, sent to training and remain in a "pool" until such time they can be slotted into a permanent vacancy. The initial agreement with AFSCME for Cook County allowed up to 18 candidates to be hired. The Department was able to hire 15 candidates in mid-August from the first round of interviews. A second round of interviews were conducted in October, in order to replenish the "pool" since initially hired DAIs had been already slotted into permanent vacancies. Based on the number of candidates then available for hire, the Department met again with AFSCME and reached an agreement to increase the size of the pool from 18 to up to 30. As a result, 17 additional DAIs will be hired by December 4, 2017.

Currently, the 15 initial DAI candidates have completed training. Eleven of these 15 DAI candidates have been slotted into permanent vacancies. The remaining 4 are in a "pool" and are case carrying in their respective offices as they await permanent assignments. In December, 2017, a third round of interviews will be held in an effort to achieve a level of maximum of 30 candidates so that there is a consistent pipeline of staff to slot into vacancies to maintain case

Heidi Dalenberg

November 17, 2017 Page Four

assignments at a consistent level in field offices and avoid higher caseload assignments previously experienced as the offices wait for vacancies to be filled and staff to be trained.

The Department has also been able to fill permanent positions and DAI positions in various downstate offices. In the past, the Department did not have enough candidates for specific child protection specialist positions to fill the vacant positions in a number of downstate offices. However, due to the changes described above, and the recent change the Department made regarding the experience requirements for child protection specialists, at this time, the Department has an increased number of candidates available for consideration for both permanent positions and DAI positions.

Since October 2017, the Department has been successful not only in filling a number of permanent vacancies in various downstate offices, but also in initiating the hiring of DAIs downstate. In October 2017, five DAIs were hired for the Joliet office and one DAI was hired in Waukegan office. Given the additional number of candidates, the Department fully anticipates an increase in the number of DAIs hired for the Waukegan, Peoria and Bloomington offices.

The Department looks forward to continued discussion of these matters.

Sincerely,

Barbara L. Greenspan

Assistant Attorney General Chief, Child Welfare Litigation Bureau

100 W. Randolph, Suite 11-200

Chicago, Illinois 60601

(312) 814-7087

cc:

Shawn Eddings Beth Solomon

Exhibit X

Case: 1:88-cv-05599 Document #: 576-1 Filed: 12/07/17 Page 165 of 179 PageID #:3642

Region/Sub-Region/Team/Supervisor/RSF

The team where the worker has the highest number of newly assigned investigations® for the year, Duplicate workers suppressed.

Worker on > 1 Team Indicator

True If the worker's newly assigned investigations* for the year is from more than one team. False if worker has newly assigned investigations* from only one team this calendar year.

Worker Risk Indicator

CY Total Team

Month Total All

Month Total Team

**Monthly Assessment

True if the number of newly assigned investigations* (all teams) for the year exceeds 153, prorated for each month. False if the number of newly assigned investigations* (all teams) for the year is 153 or less, prorated for each month.

The number of newly assigned Investigations* for the year for the worker on any team. CY Total All

The number of newly assigned investigations* for the year for the worker for the displayed team.

The number of newly assigned investigations* for the month for the worker on any team.

The number of newly assigned investigations? for the month for the worker for the displayed team. The first worker to hold a primary assignment for the investigation for either 24 or 72 hours - see report title for which criteria is used. *Newly Assigned Investigations First Primary Assign.

Total for Month All Teams number will had conditional formatting applied per the rules below:

1. This month, the number of newly assigned investigations is > 15

2. This month, the number of newly assigned investigations is > 12 and <= 15 for the fourth or more month this year.

Children and Family Service Interns

Newly Assigned Investigation Reports (72 Hours)

rough October

REPORT NAME:		Newly Assigned Invest
CALENDAR YEAR	3	2017 From January thr
Region	Sub-Region	Team
Canteal Pagion	Champaign	BLOOMINGTON PAIRS

CALENDAR YEAR		2017 From January Inrough October											-				
Region	Sub-Region	Team	Worker on > 1 Team	Worker Risk Indicator	RSF	CY Total All	Jan. Total All Feb.	. Total All	Viar. Total All	Apr. Total All May To	ut. IIA let	in. Total All	ul. Total All	Aug. Total All Sep. Total A	Oct. Total All	Exceeds Limit	t # Over Lim
entral Region	Champaign	BLOOMINGTON PAIRED TEAM 3608	FALSE	FALSE	36 08	39	0	0	0	0	0	0	0	14	12 13	Ì	\top
entral Region	Champaign	BLOOMINGTON PAIRED TEAM 3508	FALSE	TRUE	3B 08	132	14	6	14	15	20	16	12	10	11 14	У	
entral Region	Champaign	BLOOMINGTON PAIRED TEAM 3508	FALSE	FALSE	36 08	46	12	19	15	0	0	0	0	0	0 0		1
Central Region	Champaign	BLOOMINGTON PAIRED TEAM 3508	TRUE	FALSE	38 08	121	12	11	14	16	14	12	14	11	8 9		1
entral Region	Champaign	DECATUR INVESTIGATION 3545	FALSE	FALSE	3B 45	122	14	12	16	12	7	13	12	11	11 14	i e	1
Central Region		DECATUR INVESTIGATION 3b45	FALSE	FALSE	38 45	108	11	13	19		14	B	6	12	5 7		-
Central Region		DECATUR INVESTIGATION 3645	TRUE	FALSE	38 45	107	13	10	19		17	3	12		9 7		+
Central Region		DECATUR INVESTIGATION 3645	FALSE	FALSE	3B 45	118	13	12	16		15	9	14		10 14		+-
Central Region		DECATUR INVESTIGATION 3645	FALSE	FALSE	3B 45	85		0	0:		14	12	12		12 13		+
entral Region		DECATUR INVESTIGATION 3645	FALSE	FALSE	3B 45	77		0	0		13	9	11		10 13		+
Central Region		Investigations / Central / Bloomington / Pontiac 38 82	FALSE	TRUE	38 82	140	14	18	12	-	15	13	12		11 15		+
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 3B 82	FALSE	FALSE	3B 82	115	15	16	14		19	9	11		5 0		
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 38 82	FALSE	FALSE	3B 82	105	3	18	9		13	16	2	12	9 9	v	+
Central Region	Champaign	Investigations / Central / Bloomington / Pontlac 3B B2	FALSE	TRUE	38 82	144	16	16	14		16	17	15		9 11	·	+
Central Region	Champaign	Investigations / Central / Bloomington / Pontiac 3B 82	FALSE	TRUE	3B 82	156	19	17	16		21	15	13		10 14	· ·	+
Central Region	Champaign	Investigations / Central / Bloomington 38 85	FALSE	FALSE	3B 85	99	11	15	9	11	0	0	9		13 13	v	-
Central Region	Champaign	Investigations / Central / Bloomington 38 85	FALSE	FALSE	3B 85	107	14	14	12		19	3	0		10 14	<u> </u>	+
Central Region	Champaign	Investigations / Central / Bloomington 3B 85	FALSE	FALSE	3B 85	- 6	0	0	0	0	0	0	0		1 5		+
entral Region	Champaign	Investigations / Central / Bloomington 38 85	FALSE	FALSE	3B 85	33	0	n	0	0	15	17	1	0	0 0	Y	+
Central Region	Champaign	Investigations / Central / Bloomington 3B 85	FALSE	FALSE	3B 85	29	0	n	0		0	0	ò	7	10 12		+
Central Region	Peoria	Investigations / Central / Canton 1B 19	FALSE	TRUE	18 19	141	12	12	12		15	17	17	,	17 15		+
Central Region	Peoria	Investigations / Central / Canton 18 19	FALSE	FALSE	18 19	118	0	9	11		17	13	3		14 16		+
Central Region	Peoria	Investigations / Central / Canton 1B 19	FALSE	TRUE	18 19	142	16	8	13		16	17	14		16 18		+
Central Region	Peorla	Investigations / Central / Canton 18 19	FALSE	FALSE	1B 19	95	0	0	13		13	13	17		14 16		+
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	84	14	10	11	11	2	0			14 11		+
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	83	0	0		9	15	11	12		14 10		+
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	48	9	9	7	5	0	0	0	0	9 10		+
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	84	0	0	,	8	17	15	12		12 10		
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	110	14	12			15	11	13		15 0		+
Central Region	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	118	12	13	10		15	18	10		13 0		
	Springfield	Investigations / Central / Carlinville 3A 08	FALSE	FALSE	3A 08	115	12	14	- 10		14	12	12		9 9	<u> </u>	+
Central Region Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884	FALSE	FALSE	3B 84	22		0	0		- 14	0	12 D		9 13		+
	Champaign	Investigations / Central / Charleston / Decatur 3884	FALSE	TRUE	3B 84	141	12	10	18		12	15	17		12 17		
Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884	FALSE	FALSE	3B 84	171	12	0	0		14	12	- 1/	13		Y	+
Central Region		Investigations / Central / Charleston / Decatur 3884	FALSE	TRUE	3B 84	150	16	14	24		13	10	14	15	-		+
Central Region	Champaign		FALSE	TRUE	3B 84	151	14	14			17		13		16 12		+
Central Region	Champaign	Investigations / Central / Charleston / Decatur 3884	FALSE	FALSE	3B 04	72		13	18		0	14	13		19 13		+
Central Region	Champaign	Investigations / Central / Charleston 3804	FALSE	TRUE	3B 04	164					_		0		15. 20		
entral Region	Champaign	Investigations / Central / Charleston 3804	FALSE		3B 04			14	20		18	13	16	18	17 17	Y	+
entral Region	Champaign	Investigations / Central / Charleston 3804		FALSE	38 04	2		9				0	0		0 0		
Central Region	Champaign	Investigations / Central / Charleston 3804	FALSE	TRUE		157			20		10	17	12		16 18	Y	+
Central Region	Champaign	Investigations / Central / Charleston 3804	TRUE	TRUE	3B 04	142		9	3		22	9	21		19 18		+
Central Region	Champaign	Investigations / Central / Charleston 3804	TRUE	TRUE	3B 04	133		23	16		0]	19	16		13 15		
Central Region	Champaign	Investigations / Central / Charleston 3804	TRUE	TRUE	38 04	137		10	21		16	16	13		3 18		+
Central Region	Champaign	Investigations / Central / Danville / Watseka 3883	FALSE	FALSE	38 83	96	7	6	9		15	9	13	6	10 10		
Central Region	Champaign	Investigations / Central / Danville / Watseka 3883	FALSE	FALSE	38 83	1 1	Ol	ol	a	l ol	Ol	ol	o l	ol	0 1		1

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Central Region	Champaign	Investigations / Central / Danville / Watseka 3883	FALSE	TRUE	3B_83	146	11	15	17	17 16		15	16 13		'	
Central Region	Champaign	Investigations / Central / Danville / Watseka 3883	FALSE	TRUE	38 83	131	12	14	18	17 10		12	***		-	
Central Region	Champaign	Investigations / Central / Danville / Watseka 3B83	FALSE	TRUE	38 83	137	14	13	12	18 18		12	14 1			
Central Region	Champaign	Investigations / Central / Danville 38 03	FALSE	FALSE	38 03	59	0	0	0	0 0		14	15	14	$\overline{}$	
Central Region	Champaign	Investigations / Central / Danville 38 03	FALSE	FALSE	38 03	124	15	10	19	15 14		- 8	11 1		\rightarrow	
Central Region	Champaign	Investigations / Central / Danville 3B 03	FALSE	FALSE	3B 03	97		9	14	0 12		- 8	14			
Central Region	Champaign	Investigations / Central / Danville 38 03	FALSE	TRUE	38 03	131	13	12	13	18 14		- 6	19 1		Y	4
Central Region	Champaign	Investigations / Central / Danville 38 03	FALSE	TRUE	3B 03	150	11	16	20	19 16	-	16	13 1		Y	3
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	3B 86	113	13	12	14	11 8		7	8 1			
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	3B 86	112	14	11	20	11 11		S	11	11		
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	3B 86	106	12	11	18	17 12		8	11	7 2	\rightarrow	
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	38 86	108	15	14	15	10 12		9	6 1	3 7		
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	3B 86	68	9	6	0	0 13		10	10	3 4		
Central Region	Champaign	Investigations / Central / Decatur 3886	FALSE	FALSE	3B 86	63	o	0	0	0 0	10	12	17 1-		Y	2
Central Region	Peorla	Investigations / Central / Galesburg 1B 22	FALSE	FALSE	18 22	98	10	10	16	12 12	4	1	10 1	2 11		
Central Region	Peoria	Investigations / Central / Galesburg 18 22	FALSE	FALSE	1B 22	95	0	0	0	10 15	20	8	13 1	16	Y	9
Central Region	Peorla	Investigations / Central / Galesburg 1B 22	FALSE	TRUE	18 22	135	16	12	16	12 22	14	7	13 1	13		
Central Region	Peorla	Investigations / Central / Galesburg 18 22	FALSE	FALSE	18 22	118	15	12	15	12 13	13	11	6 1	3. 8		
Central Region	Peoria	Investigations / Central / Galesburg 18 22	TRUE	FALSE	1B 22	125		9	12	11 18	14	11	11	B 15		
Central Region	Peoria	Investigations / Central / Galesburg 18 22	FALSE	FALSE	1B 22	58		0	0	0 0			12 1			
		Investigations / Central / Jacksonville 3A21	FALSE	TRUE	3A 21	135		13	14	10 12			17 2	16	Y	11
Central Region	Springfield	Investigations / Central / Jacksonville 3A21	TRUE	FALSE	3A 21	72		9	18	12 16			D	0 0		
Central Region	Springfield		FALSE	TRUE	3A 21	138		11	11	17 5			16 2	3 12	Y	9
Central Region	Springfield	Investigations / Central / Jacksonville 3A21 Investigations / Central / Jacksonville 3A21	FALSE	FALSE	3A 21	122		6	9	14 17			11 2		Y	6
Central Region	Springfield		FALSE	FALSE	3A 21	116		6		13 13			14 2		Y	6
Central Region	Springfield	Investigations / Central / Jacksonville 3A21	FALSE	FALSE	3A 06	93		12	19	16 4		4	6	7 8		
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06		FALSE	3A 06	94		14	15	12 7		5	7 1	0 6		
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06	TRUE	FALSE	3A 06	110	-	14	19	1 1				0 11		
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06	TRUE			4	4	0	0	0 0		0		0 0	$\overline{}$	$\overline{}$
Central Region	Springfield	Investigations / Central / Lincoln / Taylorville 3A06	FALSE	FALSE	3A 06		- 1	6	- 8	11 6				4 9		
Central Region	Peoria	Investigations / Central / Ottawa Team 1829	FALSE	FALSE	18 29	96		12	9	13 14				4 9	'	
Central Region	Peoria	Investigations / Central / Ottawa Team 1829	FALSE	FALSE	18 29	111				7 15			5 1		$\overline{}$	
Central Region	Peoria	Investigations / Central / Ottawa Team 1B29	TRUE	FALSE	18 29	97		13	10		-			5 9	-+	-
Central Region	Peorla	Investigations / Central / Ottawa Team 1829	TRUE	FALSE	18 29	100		13	11	11 15				5 11	V	-
Central Region	Peorla	Investigations / Central / Ottawa Team 1829	TRUE	FALSE	1B 29	129		11	14	13 11		12		0 8	'	
Central Region	Peorla	Investigations / Central / Ottawa Team 1832	TRUE	FALSE	19 32	67		0		8 9	-	9		6 14	-	
Central Region	Peoria	Investigations / Central / Ottawa Team 1832	FALSE	FALSE	18 32	120		9		8 15					T .	
Central Region	Peoria	Investigations / Central / Ottawa Team 1832	FALSE	FALSE	1B 32	117		12		14 9	7			6 11	¥	1
Central Region	Peoria	Investigations / Central / Ottawa Team 1832	FALSE	FALSE	1B 32	82		6)	0	9	8 0	13		6 12	¥	1
Central Region	Peoria	Investigations / Central / Ottawa Team 1932	TRUE	FALSE	1B 32	103		10	11	7 !	-1			7 5	Y	2
Central Region	Peoria	Investigations / Central / Ottawa Team 1832	FALSE	FALSE	1B 32	123		9	11	7 14				5 13	Ψ	2
Central Region	Peoria	Investigations / Central / Peoria 18 12	FALSE	FALSE	1B 12	96		0	0				18 1		Υ	14
Central Region	Peoria	Investigations / Central / Peorla 1B 12	FALSE	FALSE	18 12	38		13	10	0 0	-1 -	0		0 0		
Central Region	Peorla	Investigations / Central / Peoria 18 12	FALSE	TRUE	18 12	138		10	10	19 14				4 17	_ Y	9
Central Region	Peorla	Investigations / Central / Peorla 18 12	FALSE	TRUE	18 12	152			13	22 19				1 15	Y	7
Central Region	Peorla	Investigations / Central / Peorla 18 12	FALSE	FALSE	18 12	84		0	0	0	7 15			8 10	Υ	10
Central Region	Peoria	Investigations / Central / Peorla Team 18 30	FALSE	FALSE	18_30	42	_0	0	0	0 (-			4 19	Y	4
Central Region	Peoria	Investigations / Central / Peoria Team 18 30	FALSE	FALSE	1B 30	2	2	_0	0	0 1		0		0 0		
Central Region	Peoria	Investigations / Central / Peoria Team 18 30	FALSE	FALSE	18 30	5	0	0	0	4		0		0 0		
Central Region	Peoria	Investigations / Central / Peoria Team 18 30	FALSE	TRUE	1B 30	163	16	15	17	19 10		16	-	3 17	γ	11
Central Region	Peoria	Investigations / Central / Peoria Team 1B 30	FALSE	FALSE	1B 30	117	6	16	6	7 2	2 8	11		2 14		
Central Region	Peoria	Investigations / Central / Peoria Team 18 30	FALSE	FALSE	1B 30	126		7	17	10 20	9	9	15 1	4 11	1	
Central Region	Springfield	Investigations / Central / Quincy 3A93	FALSE	FALSE	3A 93	88		9	9	10	9 7	8	10	8 10		
Central Region	Springfield	Investigations / Central / Quincy 3A93	FALSE	FALSE	3A 93	93		14	0	0 1	5 8	10	15	9 6		
Central Region	Springfield	Investigations / Central / Quincy 3A93	FALSE	FALSE	3A 93	60		0	0	4	9 6	10	11	9 11		
		Investigations / Central / Quincy 3A93	FALSE	FALSE	3A 93	66		0	0	3	9 7	12	13	9 13		
Central Region	Springfield	Investigations / Central / Quincy 3A93	FALSE	FALSE	3A 93	101		9	10	11	9 7	10		1 10	¥.	1
Central Region	Springfield		FALSE	FALSE	3A 20	22		0	0	0	0			1 11		
Central Region	Springfield	Investigations / Central / Quincy Team 3A20	TRUE	FALSE	3A 20	112				17	9 9	8	7	2 10		
Central Region	Springfield	Investigations / Central / Quincy Team 3A20	FALSE	FALSE	3A 20	121				17 1	1 6	15	14 1	3 11		
Central Region	Springfield	Investigations / Central / Quincy Team 3A20			3A 20	111				3 1		12	8	7 13		
Central Region	Springfield	Investigations / Central / Quincy Team 3A20	FALSE	FALSE						12 1			13	8 11		
Central Region	Springfield	Investigations / Central / Quincy Team 3A20	FALSE	FALSE	3A 20	120				13	10	8		2 10	+	$\overline{}$
Central Region	Springfield	Investigations / Central / Quincy Team 3A20	FALSE	FALSE	3A 20	119	14	17	16	15]	9	. 5) .	14]			

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Central Region Springfield JERSEYVILLE PAIRED 3831 TRUE FALSE SA 31 100 10 11 10 10 9 8 10 12 13 7	
Central Region Springfield LINCOLN INVESTIGATION - 3a09 TRUE FALSE 3A 09 126 10 12 11 11 15 21 12 12 11 11	
Central Region Springfield LINCOLN INVESTIGATION - 3a09 TRUE FALSE 3A 09 94 6 7 6 6 11 7 10 12 13 16 Y	
Central Region Springfield LINCOLN INVESTIGATION - 3a09 FALSE FALSE SA 09 116 10 8 3 12 15 13 11 14 13 17 Y	
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Central Region Peoria PEORIA INVESTIGATION 1B 47 FALSE FALSE 1B 47 103 10 10 16 11 13 12 17 14 0 0 V	
Central Region Peoria PEORIA INVESTIGATION 18 47 FALSE TRUE 18 47 142 15 13 17 13 7 17 16 10 17 17 Y	
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Central Region Peoria PEORIA INVESTIGATION 1B 47 FALSE FALSE 18 47 120 12 11 17 16 11 9 11 16 13 4 Y Central Region Peoria PEORIA INVESTIGATION 1B 47 FALSE TRUE 1B 47 137 11 13 15 7 20 10 6 17 15 23 Y Central Region Peoria Placement / Central / Ottawa / Princeton 1B31 FALSE FALSE 18 31 125 13 12 12 13 15 14 12 7 16 11 Y Central Region Peoria Placement / Central / Ottawa / Princeton 1B31 FALSE FALSE 1B 31 123 13 12 12 11 16 12 10 12 16 9 Y	
Central Region Peoria PEORIA INVESTIGATION 1B 47 FALSE TRUE 1B 47 137 11 13 15 7 20 10 6 17 15 23 Y Central Region Peoria Placement / Central / Ottawa / Princeton 1B31 FALSE FALSE 1B 31 125 13 12 12 13 15 14 12 7 16 11 Y Central Region Peoria Placement / Central / Ottawa / Princeton 1B31 FALSE FALSE 1B 31 123 13 12 12 11 16 12 10 12 16 9 Y	17
Central Region Peoria Placement / Central / Ottawa / Princeton 1831 FALSE FALSE 18 31 125 13 12 12 13 15 14 12 7 16 11 Y Central Region Peoria Placement / Central / Ottawa / Princeton 1831 FALSE FALSE 18 31 123 13 12 11 16 12 10 12 16 9 Y	
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Central Region Springfield SPRINGFIELD INVESTIGATION 3-32 FALSE 3A 32 204 0 0 0 7 17 13 21 18 14 14 Y	
Central Region Springfield SPRINGFIELD INVESTIGATION 3±32 FALSE FALSE 3A 32 101 0 0 6 19 12 18 20 10 16 Y	
Central Region Peorla Tazewell / Woodford Investigations 1842 FALSE TRUE 18 42 133 9 16 6 7 19 14 18 12 16 16 Y	
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	Peoria	Tazewell / Woodford Investigations 1b48	FALSE	FALSE	18 48	41	10	11	14	5 1	0	0	0	0	0		
Central Region	Peoria	Tazewell / Woodford Investigations 1b48	FALSE	TRUE	18 48	152	10	12		6 19	18	8	18	15	20.	Y	14
Central Region	Peoria	Tazewell / Woodford Investigations 1b48	FALSE	FALSE	18 48	71	15	15		5 16	7	0	0	0	0		
Central Region	Peoria	Tazewell / Woodford Investigations 1b48	FALSE	TRUE	18 48	145	10	14		.5 16	13	10	15	21	18	Υ	12
Central Region	Peoria	Tazewell / Woodford Investigations 1b48	FALSE	FALSE	18 48	33	13	14		0 0	0	0	0	0	0		
Central Region	Champaign	URBANA INVESTIGATION 3b44	TRUE	TRUE	38 44	149	S	7		3 23	16	14	21	14	14	Y	11
Central Region	Champaign	URBANA INVESTIGATION 3544	FALSE	TRUÉ	38 44	180	18	25	15 1	8 23	16	18	14	14	19	Y	13
Central Region	Champaign	URBANA INVESTIGATION 3544	FALSE	FALSE	38 44	12	8	0		0 0	4	o l	D)	0	0	Υ	1
Central Region	Champaign	URBANA INVESTIGATION 3544	TRUE	FALSE	38 44	98	8	12	13 1	8 10	8	4	8	4	13		
Central Region	Champaign	URBANA INVESTIGATION 3544	TRUE	FALSE	3B 44	82	2	0	0	o s	12	13	17	14	19	Υ	9
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	FALSE	600102	1	0	0	0	0 0	0.	0	0	0	1.		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	FALSE	6C0102	101	10	11	15	3 17	9	12	6	10	8		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	FALSE	600102	114	14	13	17 1	3 8	7	11	10	8	13		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	FALSE	6C0102	120	13	9	15 1	5 19	12	9	12	8	8		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	TRUE	6C0102	132	12	13	19 1	1 17	12	8	7	14	19	Ÿ	4
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0102	FALSE	FALSE	6C0102	59	0	0		1 10	7	7	11	8	15		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0151	FALSE	FALSE	6C0151	87	0	0	0	0 17	19	10	12	11	18	Y	7
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0151	FALSE	FALSE	6C0151	119	2	11	22	9 18	16	9	9	13	10	v	1
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0151	TRUE	TRUE	6C0151	139	10	15		1 18	18	13	7	14	11	v .	- 4
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0151	FALSE	FALSE	6C0151	121	19	14		5 12	17	10	, s	11	5	v	
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0151 Child Protection / Cook Central / Investigations Team 6C0151	TRUE	FALSE	600151	59	14	17	21	3 0	2	10		0	3	'	
	Cook Central	Child Protection / Cook Central / Investigations Team 6C0271	FALSE	FALSE	6C0271	112	31	10	17 1	4 12	9	12	7	14	14		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0271 Child Protection / Cook Central / Investigations Team 6C0271	FALSE	FALSE	6C0271	80	0	0	0 1		19	4	10	7	15	v	
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C02/1 Child Protection / Cook Central / Investigations Team 6C02/1	FALSE	FALSE	600271	92	10	15	15	9 0	19	4	10	11	11	f	4
Cook Region			FALSE	FALSE	6C0271		13	12		4 D		3	101	\rightarrow			
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0271				23	13	3		-	0	- 0	U	0	0	-	
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0271	FALSE	FALSE	6C0271	108	8			9 15	13	12	8	14	15		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0353	FALSE	FALSE	6C0353	64	0	0	0	5 14	13	12	5	3	12		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0353	FALSE	FALSE	6C0353	16	8	7	•	0 0	. 0	0	0	0	0		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0353	FALSE	TRUE	6C0353	155	19	16	211		18	9	10	13	14	γ	3.
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0353	FALSE	FALSE	60353	101	0	0	0 1		19	13	10	15	13	Y	5
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Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0353	FALSE	TRUE	6C0353	142	16	15	23 1		3	17	9	15	15	У	2
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0476	FALSE	FALSE	6C0476	104	13	6	3 1		14	10	6	13	11		
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Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0476	FALSE	FALSE	6C0476	121	12	10	16 1	6 18	16	0	10	14	9	Y	1
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Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0476	TRUE	TRUE	6C0476	138	17	13	16 1	5 13	20	2	12	14	16	Υ	6
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0544	FALSE	FALSE	600544	96	8	10	12	6 11	12	15	6	6	10		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0544	FALSE	TRUE	600544	151	18	13	21 1	6 20	3	16	13	15	16	Y	5
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0544	FALSE	FALSE	600544	4	0	0	0	0 0	0	0	0	0	4		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0544	FALSE	FALSE	6C0544	35	0	o	17 1	8 0	0	0	0	0	0		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0544	TRUE	FALSE	600544	116	17	15	21 1	0 11	2	7.	13	12	8		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0601	FALSE	FALSE	6C0601	72	0	o.		0 12	11	7	15	15	12		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 600601	FALSE	TRUE	5C0601	136	12	14		1 16	11	B	13	14	18	Y	3
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0601	TRUE	FALSE	600601	125	15	16		9 11	2	14	11	12	18	v l	3
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 600601	TRUE	TRUE	5C0601	133	13	15	16 1		14	4	R	12	17	· ·	
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0601	FALSE	FALSE	6C0601	35	16	14		0 0	0	7	0	0	0	. 	
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0628	FALSE	FALSE	6C0628	109	13	14	4	4 18	15	10	- 7	12	13		
	Cook Central	Child Protection / Cook Central / Investigations Team 6C0628	TRUE	FALSE	6C0628	105	11	17	0	9 15	15	4	10	15	16	-	
Cook Region		Child Protection / Cook Central / Investigations Team 6C0628	FALSE	FALSE	600628	103	10	13	17 1	5 18	11	8	7	0	8	1	
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Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0628	FALSE	FALSE	6C0628	45	0	0		0 0	U	9			14		
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Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0666	FALSE	TRUE	6C0666	130	13	14	18 1:		12	11	12	10	15		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0666	FALSE	FALSE	6CD666	118	10	14	16 1		10	8	12	3	18	Y	3
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0666	FALSE	FALSE	6C0666	117	12	12	18 1		9	7	12	11	5		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0666	TRUE	FALSE	600666	116	9	14	16 12		9	10	8	10		Υ	1
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 600666	TRUE	TRUE	6C0666	138	13	14	19 10		12	13	6	10	15		
Cook Region	Cook Central	Child Protection / Cook Central / Investigations Team 6C0666	FALSE	FALSE	6C0566	124	13	14	15 13		6	9	9	14	14		
Cook Region	Cook North	Child Protection / Cook North / Investigations Team 680103	FALSE	FALSE	680103	83	a	0	3 11	1 12	9	_ 10	8	12	18	Υ	3
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Column C	Cook Region	Cook North						12			8 1	1 9		B 7	12	- 6		
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Contract	Cook Region	Cook North	Child Protection / Cook North / Investigations Team 680104	FALSE	FALSE	6B0104	128	12	13	13 1	12 1	5 10	9	11	14	19	γ	4
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Column C	Cook Region	Cook North	Child Protection / Cook North / Investigations Team 680105	FALSE	FALSE	680105	79	0	0	4	12 1	3 7	e	5 8	13	16	Y	1
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Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600174	TRUE	FALSE	6D0174	79	-	15	21		5 3		4	0	7		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600174	FALSE	TRUE	6D0174	134	11	13	18	171	1 15	13	12	12	12		
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Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600177	FALSE	FALSE	600177	38	13	15	10		0 0		D	0	0	T i	
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	Cook South	Child Protection / Cook South / Investigations Team 6D0229 Child Protection / Cook South / Investigations Team 6D0231	FALSE	TRUE	6D0229	137		15			5 16		9	8	14	ÿ	- 2
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600231	FALSE	TRUE	6D0231	155		18	19		5 17		11	13	15	y	
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Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0247	FALSE	FALSE	6D0247	1		0	0		0 0		0	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600343	TRUE	TRUE	6D0343	130		16	21		9 7	11	12	13	19	γ	4
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600343	FALSE	FALSE	6D0343	17			15	*	0 0		0	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0343	FALSE	FALSE	6D0343	26		0	0	0	0 0		5	7	14		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0343	FALSE	FALSE	6D0343	11		0	0	0	0 0		0	2	9		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0343	TRUE	FALSE	6D0343	6		0	0	0	2 0		D D	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600343	FALSE	FALSE	6D0343	10		0	0	0	0 0	[0	2	8		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0343	FALSE	TRUE	6D0343	156		20	15		0 17	13	10	12	14	Y	2
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600356	FALSE	FALSE	6D0356	66		19	11		5 2	-1	0)	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600356	FALSE	FALSE	6D0356	9		0	0	-	0 0		D	3	6		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600356	FALSE	TRUE	6D0356	153	21	17	19	15 1	9 14	10	12	12	14		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0356	FALSE	FALSE	6D0356	12	0	0	0	0	0 0	0	0	3	9		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600356	FALSE	FALSE	6D0356	45	13	13	17	2	0 0	o	D	0	0	T I	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600356	FALSE	FALSE	6D0356	4	4		0	0	00	0	0	0	0		$\overline{}$
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0404	FALSE	FALSE	6D0404	2	0	0	2	0	0 0	0	0	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600404	TRUE	FALSE	6D0404	111	13	13	17	8 1	4 11	0	9	10	16	Υ	1
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0404	FALSE	FALSE	6D0404	128	15	15	14	15 1	4 14	15	15	3	8		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600404	TRUE	FALSE	6D0404	119	13	11	16	14 1	7 8	3	11	12	14		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600404	TRUE	TRUE	6D0404	141		13	16		7 17		16	14	15	γ	6
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0404	FALSE	FALSE	6D0404	79		10	13		5 15		0	0	0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0404	TRUE	FALSE	600404	110		11	16		4 11	-	18	15	8	γ	3
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0404	FALSE	FALSE	6D0404	1		0	0		0 0		0	0	1		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516	TRUE	FALSE	6D0516	107			8		2 14		13	11	5		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516	FALSE	FALSE	6D0516	108		10			6 14		12	9	10		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516	FALSE	FALSE	6D0516	43		0	10		3 3		0	6	0	-	
	Cook South	Child Protection / Cook South / Investigations Team 600516	FALSE	FALSE	600516	24		0	0		0 5	-	7	4	7	-	$\overline{}$
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516 Child Protection / Cook South / Investigations Team 600516	FALSE	FALSE	6D0516	80		0	9	_	4 9		13	10	- 4		
Cook Region			FALSE	FALSE	6D0516	21		0	0		0 0		13	10		-	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516								-			8	9	- 0		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600516	TRUE	FALSE	6D0516	96					1 15				7	N.	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600550	TRUE	TRUE	600550	145			12		0 6		16	15	16	Y	5
Cook Region	Coak South	Child Protection / Cook South / Investigations Team 6D0550	TRUE	FALSE	600550	99			10		4 7		9	11	13		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600550	FALSE	FALSE	600550	6		0	0		0 0		0	0	0		
Cook Region	Coak South	Child Protection / Cook South / Investigations Team 6D0550	FALSE	FALSE	6D0550	73		0		-	8 15		13	16	7	Υ	4
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600550	TRUE	FALSE	6D0550	125	-				7 14		14	15	16	γ	7
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0550	FALSE	FALSE	600550	3					0 0		0	0	3		
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0550	FALSE	TRUE	6D0550	131	14	14	14	11 1	3 6	16	12	15	16	Υ	2
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0550	TRUE	FALSE	600550	100	11	0	0	11 1	5 17	7	5	15	19	γ	6

Cook Region	Coak South	Child Protection / Cook South / Investigations Team 600571	FALSE	TRUE	6D0571	134	14	16	19	121	5 18	14	15	12	0 Y	3
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0571	FALSE	FALSE	6D0571	129	12	14	14	11 1	5 4	8	17	16	18 Y	6
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600571	FALSE	FALSE	6D0571	4	ol	0	0	4 (0 0	D	D	0	oi	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0571	FALSE	TRUE	6D0571	131	14	12	3	9 21	0 15	12	12	15	19 Y	4
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600571	FALSE	TRUE	6D0571	139	15	16	17	14 10		14	1	12	18 Y	5
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600571	FALSE	TRUE	6D0571	145	13	12	11	16 2		13	15	13	16 Y	1 6
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0571	FALSE	TRUE	6D0571	134	14	12	16	16 10		3	13	15	14 Y	+ 1
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0546	FALSE	FALSE	6D0646	79	12	4	10	4	1 10	- 4	11	10	13	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0646	FALSE	FALSE	6D0646	4	1		1	~ 1	0 0	- 4	41	0	13	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0646	FALSE	FALSE	6D0646	79	10	5	0		*1	0	1		<u> </u>	
			FALSE					-		6 10		12	4	10	7	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0646	FALSE	TRUE FALSE	6D0646	145	13	11	16	19 17			15	12	17 Y	2
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0646			6D0646	123		10	15	17 10		10	14	11	14	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0646	TRUE	FALSE	5D0646	124	11	11	15	13 17	-	9	9	11	16 Y	1
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600662	FALSE	FALSE	6D0662	28	10	9	9		이	0	- 0	0	0	
Coak Region	Cook South	Child Protection / Cook South / Investigations Team 6D0662	FALSE_	FALSE	6D0662	67	0	0	0	2 1:		10	10	9	14	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0662	FALSE	FALSE	6D0662	75	12	11	8	10 1		2	7	0	0	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0662	FALSE	TRUE	6D0662	132	13.	14	15	16 1		7	12	11	16 Y	1
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600662	FALSE	FALSE	6D0662	41	10	12	14	5 (0 0	0	0	0	0	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0662	FALSE	FALSE	5D0662	122	10	12	14	18 15	13	5	13	10	12	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0667	FALSE	FALSE	6D0667	121	11	14	14	15 19	5 13	10	13	11	5	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600667	FALSE	FALSE	6D0667	119	11	15	12	13 1:	1 9	12	15	9	12	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0667	FALSE	FALSE	6D0667	65	0	0	0	4 1	10	10	11	11	4	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0667	FALSE	FALSE	6D0667	128	11	12	14	16 18	15	9	7	10	16 Y	1
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600667	FALSE	FALSE	6D0667	3	0	0	0		0	0	ol	0	3	-
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 600667	FALSE	FALSE	6D0667	2	ol	0	0		0	0	0	0	2	
Cook Region	Cook South	Child Protection / Cook South / Investigations Team 6D0667	FALSE	FALSE	6D0667	3	ol	0	0		0	0	0	0	3	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse / Team 2 6A13	FALSE	FALSE	6A 13	96	0	0	2	13 15	1	15	13	15	12	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse / Team 2 6A13	FALSE	TRUE	6A 13	130	15	13	17.	13		15	13	12	12	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse / Team 2 6A13	FALSE	FALSE	6A 13	115	12	13	17	9 11	-1	2	11	15	14	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse / Team 2 6A13	FALSE	FALSE	6A 13	128	9	11	14	14 16		17.	111			
Cook Region	+		FALSE	FALSE	6A 12	104	14	14	20				91	13	14 Y	2
	Cook Administration Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 1 6A12	FALSE	FALSE	6A 12	120						13	. 11	0	0	
Coak Region	+	Investigations / Cook / Chicago City Sex Abuse Team 1 6A12		FALSE			16	15	15	14 15		1	12	15	6	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 1 6A12	FALSE		6A 12	89		0	1	11 14		16	13	10	14 Y	1
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 1 6A12	TRUE	FALSE	6A 12	84	14	15	19	11 14		0	0	0	0	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 3 6A19	FALSE	FALSE	6A 19	78	12	16	17	10 15		0	. 0	0	0	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 3 6A19	FALSE	FALSE	6A 19	96	0	0	3	14 14		14	12	15	14	
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 3 6A19	FALSE	FALSE	6A 19	92	0	0	0	1115		14	14	14	14 Y	2
Cook Region	Cook Administration	Investigations / Cook / Chicago City Sex Abuse Team 3 6A19	FALSE	FALSE	6A 19	19	0	0	0		0	0	0	6	13	
Northern Region	Aurora	ELGIN PAIRED TEAM • 2a66	FALSE	TRUE	2A 66	80	0	0	. 0	0 0	16	14	14	17	19 Y	13
Northern Region	Aurora	ELGIN PAIRED TEAM - 2166	FALSE	FALSE	2A 66	1	0	0)	0	0 0	0	0	0	0	1	
Northern Region	Aurora	ELGIN PAIRED TEAM - 2166	FALSE	FALSE	2A 66	2	0	0)	0	0 0		2	0	0	0	
Northern Region	Aurora	ELGIN PAIRED TEAM • 2a66	FALSE	FALSE	2A 66	21	0	0	0	0 0	0	0	0	7	14	
Northern Region	Aurora	ELGIN PAIRED TEAM - 2x66	TRUE	TRUE	2A 66	158	18	15	8	18 20	9	11	19	20	20 Y	16
Northern Region	Aurora	ELGIN PAIRED TEAM - 2a66	FALSE	FALSE	2A 66	2	0	0	o	0 0	0	o	0	0	2	
Northern Region	Aurora	ELGIN PAIRED TEAM - 2a66	TRUE	TRUE	2A 66	149	13	15	17	20: 19	9	14	13	17	12 Y	2
Northern Region	Aurora	ELGIN PAIRED TEAM - 2#66	TRUE	TRUE	ZA 66	158	17	16	16	21 19	13	13	13	19	15 Y	10
Northern Region		Freeport Field Office 1A 40	FALSE	FALSE	1A 40	59	10	13	20	15 1	0	0	0	0	0	
Northern Region	 	Freeport Field Office 1A 40	FALSE	TRUE	1A 40	150	10	14	14	20 24		7	14	20	19: Y	0
Northern Region	· · · · · · · · · · · · · · · · · · ·	Freeport Field Office 1A 40	FALSE	FALSE	1A 40	124	10	6	0.	2 25		14	11	28	17 Y	15
Northern Region	 	Freeport Field Office 1A 40	FALSE	TRUE	1A 40	161	10	12	19	17 19		19	14	19	20 Y	15
Northern Region	1	Freeport Field Office 1A 40	FALSE	TRUE	1A 40	157	10	13	14	14 22		15	17	25	17 Y	17
Northern Region		GLEN ELLYN INVESTIGATION 28 47	FALSE	FALSE	2A 47	107	2	7	10	14 12		13	10	17	17 Y	1/
Northern Region		GLEN ELLYN INVESTIGATION 22 47	FALSE	FALSE	ZA 47	121	18	11	10	15 12		9	10]	12		4
			FALSE	FALSE	2A 47			11	/		-	91	10	$\overline{}$	14	
Northern Region		GLEN ELLYN INVESTIGATION 2a 47				1	0	U	0	0 0	-	0	0	1	0	
Northern Region		GLEN ELLYN INVESTIGATION 2a 47	FALSE	FALSE	2A 47	115	14	9	5	15 13		8	12	16	15 Y	1
Northern Region		GLEN ELLYN INVESTIGATION 2a 47	TRUE	FALSE	2A 47	117	14	4	12	13 14	10	12	11	17	10 Y	2
Northern Region		GLEN ELLYN INVESTIGATION 2a 47	TRUE	FALSE	2A 47	103	16	7	13	13 9	8	. 2	7	13	15	
Northern Region		GLEN ELLYN INVESTIGATION 2a 47	FALSE	FALSE	2A 47	123	12	11	14	11 8	10	12	12	15	18 Y	3
Northern Region		Investigations / Northern / Aurora Team 2A 11	FALSE	FALSE	2A 11	1	0	0	0	0 0	0	1	0	0	0	
Northern Region	Aurora	Investigations / Northern / Aurora Team 2A 11	TRUE	TRUE	2A 11	169	14	15	16	14 20		14	10	23	22 Y	14
Northern Region	Aurora	Investigations / Northern / Aurora Team 2A 11	FALSE	FALSE	2A 11	58	11	12	15	20 0	0	0	0	0	0	
Northern Region	Aurora	Investigations / Northern / Aurora Team 2A 11	TRUE	TRUE	2A 11	163	13	19	17	17 12	16	15	16	20	18 Y	16

Northern Region Aurora	Investigations / Northern / Aurora Team 2A 11	TRUE	TRUE	2A 11	153	15	14	17	15 20			16	13	18	Υ	7
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 11	TRUE	TRUE	2A 11	172	14	16	20	11 2		16	15	19	18	Y	19
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 11	TRUE	TRUE	2A 11	139	13	13	18	17 19		14	9	10	19	Y	4
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 12	TRUE	TRUE	2A 12	168	11	13	16	21 2		12	15	18	26	Υ	17
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 12	TRUE	TRUE	2A 12	155	8	15	14	15 2:		10	17	18	18	Υ	12
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 12	TRUE	FALSE	2A 12	63	_14	16	13	7 1	2 0	D D	1	0	0		
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 45	TRUE	FALSE	2A 45	76	14	13	14		9 0	0	0	3	10		
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 45	TRUE	FALSE	2A 45	66	10	13	13	16 14	4 0	0	0	0	0		
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 45	TRUE	TRUE	2A 45	164	14	15	16	19 2:	2 13	6	18	21	20	Y	17
Northern Region Aurora	Investigations / Northern / Aurora Team 2A 45	TRUE	FALSE	2A 45	86	0	0	0	10 2:	1 5	17	10	14	9	Υ	2
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 16	FALSE	TRUE	1A 16	151	20	17	18	13 1	7 12	15	14	16	9	Υ	1
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 16	FALSE	TRUE	1A 16	138	21	15)	8	13 14	4 8	11	17	13	18	Y	5
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 16	FALSE	TRUE	1A 16	149	15	19	18	16 1:	2 6	7	11	20	25	Y	15
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 16	FALSE	FALSE	1A 16	75	21	17	14	11 :	9 3	0	0	0	Ö		
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 16	FALSE	TRUE	1A 16	147	5	13	11	17 11	8 16	6	20.	14	27	Y	21
Northern Region Rockford	Investigations / Northern / Dekaib Team 1A 16	FALSE	TRUE	1A 15	149	16	11	14	15 19	9 10	7	12	17	28	Y	15
Northern Region Rockford	Investigations / Northern / Dekaib Team 1A 43	TRUE	FALSE	1A43	74	0	0	0	4 10	9	9	12	15	15		
Northern Region Rockford	Investigations / Northern / Dekaib Team 1A 43	TRUE	FALSE	1A43	114	0	12	21	10 11	B 13	9	12	10	9		_
Northern Region Rockford	Investigations / Northern / Dekaib Team 1A 43	FALSE	FALSE	1A43	89	6	10	7	8 9	9 9	8	9	11	12		
Northern Region Rockford	Investigations / Northern / Dekalb Team 1A 43	TRUE	FALSE	1A43	78	8	2	12	4 1	1 7	6	7	10	11		
Northern Region Aurora	Investigations / Northern / Eigin Team 2A 13	TRUE	TRUE	2A 13	138	14	15	16	14 2		9	13	15	15		
Northern Region Aurora	Investigations / Northern / Elgin Team 2A 13	TRUE	TRUE	2A 13	164	19	17	18	20 18		10	17	15	21	γ	R
Northern Region Aurora	Investigations / Northern / Eigin Team 2A 13	FALSE	FALSE	2A 13	22	0	0	0		0 0	0	0	6	16		
Northern Region Aurora	Investigations / Northern / Elgin Team 2A 13	TRUE	TRUE	2A 13	163	13	18	16	23 16		15	13	20	16	ν	12
Northern Region Aurora	Investigations / Northern / Eigin Team 2A 13	FALSE	FALSE	2A 13	63	3	0	0	_	0 0	0	17	22	21	v	15
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 05	FALSE	FALSE	2A 05	48	0	0	0	0 1	-	12	9	3	0		2.5
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 05	TRUE	FALSE	2A 05	94	3	ol	14	15 16		1	13	12	12		
Northern Region Aurora	Investigations / Northern / Glen Ellyn Tearn 2A 05	TRUE	FALSE	ZA 05	108	13	14	15	8 1		18	14	3	7	· ·	- 3
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 05	TRUE	TRUE	2A 05	133	3	16	13	14 17		10	14	15	19	, ,	3
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 05	FALSE	TRUE	2A 05	84	0	0	0	0 14		11	14	16	19	- T	- /
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 07	FALSE	TRUE	2A 07	132	13	15	12	13 14		7	13	15	17		
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 07	FALSE	TRUE	2A 07	137	15	15	13	12 15		13	13	15	16	Y	3
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 07	FALSE	FALSE	2A 07	116	19	12	6	14 1		131	10	14	15	- 1	
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 07	TRUE	FALSE	2A 07	112	14	18	11	15 18		0	7	13	13		
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team ZA 07	FALSE	FALSE	2A 07	129	11	14	11	14 1		12	11	15	15		
Northern Region Aurora	Investigations / Northern / Glen Eilyn Team 2A 07	TRUE	FALSE	2A 07	88	0	14	0	9 16		13		17	15		
	Investigations / Northern / Glen Eilyn Team 2A 09	TRUE	FALSE	2A 07	84	2		12		+	2	13		8	Y	5
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 09	FALSE	FALSE	2A 09	117	13	10	8	6 11		10	13	17	19		- 6
Northern Region Aurora	Investigations / Northern / Gien Ellyn Team 2A 09	TRUE	FALSE	2A 09	84	10	10	10	4 16			13	13	20	Y	8
Northern Region Aurora		FALSE	FALSE	2A 09							0 R	8	10	15		
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 09	TRUE	FALSE	2A 09	109	15 16	10	9	7 6			- 6	13	15		
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 09	FALSE	FALSE	2A 09	108	13		7		-1	14	9	- 8	17	Y	2
Northern Region Aurora	Investigations / Northern / Glen Eilyn Team 2A 09						15		13 11		11	8	9	16	Y	1
Northern Region Aurora	Investigations / Northern / Glen Ellyn Team 2A 09	TRUE	FALSE	2A 09	50	14	10	11	10 5	*1	0	0	D	0		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 14	TRUE FALSE	FALSE		80	11	12	13	18 19		0	0	3	0		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 14		TRUE	2A 14	135	8	3	16	12 20		11	14	16	20	Y	9
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 14	TRUE	FALSE	2A 14	110	12	17	15	15 17		15	5	0	10		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 14	FALSE	FALSE	2A 14	109	4	7	8	14 15		14	11	12	15		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 14	TRUE	FALSE	2A 14	117	15	10	10	12 14		17	14	0	12	Υ	2
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 17	FALSE	TRUE	2A 17	141	12	17	12	16 5		16	16	16	15	Y	6
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 17	TRUE	TRUE	2A 17	135	14	9	15	16 18		8	7	16	16	Y	3
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 17	FALSE	TRUE	2A 17	149	15	18	15	17 5		14	11	22	15	Y	10
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 17	FALSE	TRUE	2A 17	157	14	17	18	16 19		9	14	18	19	Y	10
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 17	FALSE	TRUE	2A 17	159	16	17	12	18 15		13	15	19	18	Υ	11
Northern Region Aurora	Investigations / Northern / Joliet Team ZA 19	FALSE	FALSE	2A 19	12	0	0	0	0 0	-1	0	0	2	10		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 19	TRUE	FALSE	2A 19	54	5	10	11	7 18		0	0	0	0		
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 19	TRUE	FALSE	2A 19	30	0	0	0	0 0	0	0	10	18	2	Υ	3
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 19	TRUE	FALSE	2A 19	126	9	10	13	17 16		7	13	16	16	Υ	2
Northern Region Aurora	Investigations / Northern / Joliet Team 2A 19	TRUE	FALSE	2A 19	126	18	15	15	15 19	12	8	17	7	0	Y	2
Northern Region Aurora	Investigations / Northern / Joliet Team ZA 19	FALSE	FALSE	2A 19	18	14	4	0	0 0	0	0	0	0	0		
Northern Region Aurora	Investigations / Northern / Jollet Team 2A 19	FALSE	FALSE	2A 19	70	0	0	0	0 6	-	9	15	19	18	Y	7
Northern Region Aurora	Investigations / Northern / Kankakee Team 2A 22	FALSE	TRUE	2A 22	132	0	7 _	16	12 20	15	13	20	16	13	Υ	10
	Investigations / Northern / Kankakee Team 2A 22	FALSE	FALSE	2A 22	14	1	0	2	7 0	0	- 1	ol	0	0		
Northern Region Aurora	Investigations / Northern / Nankakee Team 2A 22	PALSE	FALSE	ZA 22	141		- 01	2	-/	/	*1	9	V)	V		

				In	1		1			. ml	1	1		1		
Northern Region Aurora	Investigations / Northern / Kankakee Team 2A 22	FALSE	TRUE	2A 22	169	16	15	17 15			11	20	18	17	Υ	15
Northern Region Aurora	Investigations / Northern / Kankakee Team 2A 22	FALSE	TRUE	2A 22	170	16	14	17 10			12	21	16	19	Y	_ 19
Northern Region Aurora	Investigations / Northern / Kankakee Team 2A 22	FALSE	TRUE	2A 22	158	14	14	10 10			14	20	19	19	Υ	23
Northern Region Rockford	Investigations / Northern / Rockford Spanish Team 1A 42	FALSE	TRUE	1A42	145	17	17	16 13			14	14	11	20	Y	5
Northern Region Rockford	Investigations / Northern / Rockford Spanish Team 1A 42	TRUE	TRUÉ	1A42	165	18	16	23 24			20	2	7	13	Y	9
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	TRUE	TRUE	1A 15	180	16	16	13 26			3	31	13	11	Y	24
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	FALSE	TRUE	1A_15	136	14	15	15 19		0	9	27	10	22	Υ	19
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	FALSE	TRUE	1A 15	184	15	8	14 22			20	28	15	17	Υ	32
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	FALSE	TRUE	1A 15	174	17	23	15 19			17	14	11	23	Υ	13
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	FALSE	TRUE	1A 15	203	12	20	21 15	26	22	23	28	15	21	Y	40
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 15	FALSE	FALSE	1A 15	116	9	20	18 11	. 13	15	0	5	12	13		
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 55	FALSE	FALSE	1A 55	_11	0	0	0 0	0	0	.0	0	0	11	į į	
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 55	FALSE	FALSE	1A 55	125	7	9	12 12	18	13	12	7	9	26	Y	11
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 55	FALSE	TRUE	1A 55	206	16	20	22 19	23	22	21	29	12	22	Υ	37
Northern Region Rockford	Investigations / Northern / Rockford Team 1A 55	FALSE	TRUE	1A 55	132	13	16	19 12	9	14	11	14	13	11		
Northern Region Rockford	Investigations / Northern / Sterling Team 1A 17	TRUE	FALSE	1A 17	104	10	9	10 8	12	14	7	21	7	6	Y	6'
Northern Region Rockford	Investigations / Northern / Sterling Team 1A 17	TRUE	FALSE	1A 17	90	11	13	10 1	0	10	17	7	18	3	γ	S
Northern Region Rockford	Investigations / Northern / Sterling Team 1A 17	FALSE	FALSE	1A 17	123	10	11	10 12	14		18	19	15	3	γ	7
Northern Region Rockford	Investigations / Northern / Sterling Team 1A 17	FALSE	TRUE	1A 17	139	13	12	10 11			14	21	18	6	Y	12
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	FALSE	TRUE	2A 35	136	13	12	13 13			15	13	12	21	Y	6
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	TRUE	TRUE	2A 35	216	19	25	21 24			11	18	21	22	Y	20
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	TRUE	TRUE	2A 35	138	0	0	1 22			9	17	23	22	Y	17
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	FALSE	TRUE	2A 35	165	16	16	14 15			15	15	22	20	y	18
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	FALSE	TRUE	2A 35	111	0	0	0 6			17	15	21	24	y	70
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	FALSE	FALSE	2A 35	127	13	13	13 13			11	13	12	12	,	20
		FALSE	FALSE	2A 35	97	13	14	13 8			9	13		0		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 35	FALSE	TRUE	2A 36	137	17	22	23 19			12	0	0	0	γ	8
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36	FALSE	TRUE	ZA 36	177	19	14	15 21			13	16	22	20	Ý I	18
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36	FALSE	FALSE	2A 36	2	13	0	0 0		13)	13	10	0	0	' -	10
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36														-	
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36	FALSE	TRUE	2A 36	140	20	22	18 23			0	- 0	20	21		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36	FALSE	TRUE	2A 36	183	17	19	21 19			16	12	23	19	Y	13
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 36	FALSE	TRUE	2A 36	167		21	20 24		13	8	17	8	22	-Y	9
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	FALSE	2A 38	38	12	13	13 0	1————		0	0	0	0		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	TRUE	2A 38	83	16	22	22 23		0	0	0	0	0		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	FALSE	2A 38	3	3	0	0 0		0	0	O)	0	D D		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team ZA 38	FALSE	FALSE	2A 38	20	0	0	0 0		0	0	0	8	12		
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	TRUE	2A 38	152	15	12	14 12			13	12	23	20	Y	13
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	FALSE	2A 38	121	13	14	11 14			12	12	17	7	Y	2
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	TRUE	2A 38	90		0	0 0	12	15	16	16	11	20	Y	10
Northern Region Aurora	Investigations / Northern Region / Waukegan Team 2A 38	FALSE	FALSE	2A 38	18	0	0	0 0		0	0	0	4	14		
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 27	FALSE	FALSE	2A 27	82	8	8	6 1	. 0	0	9	16	15	19	Υ	5
Northern Region Aurora	Investigations / Northern Region / Woodstock Team ZA 27	TRUE	FALSE	2A 27	50	13	7	3 3	2	1	3	0	14	4		
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 27	TRUE	FALSE	2A 27	121	13	8	13 14	12	11	12	18	14	6	Y	3
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 27	TRUE	FALSE	2A 27	110	11	9	16 14	15	1	2	12	19	11		
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 27	TRUE	FALSE	2A 27	127	12	10	14 16	16	16	17	13	9	4	γ	3
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 27	TRUE	FALSE	ZA 27	121	13	10	10 15	14	11	13	15	17	3	Υ	2
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 33	TRUE	TRUE	2A 33	148	13	. 9	15 13	16	14	17	14	18	19	Υ	17
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 33	FALSE	TRUE	2A 33	135	14	8	14 10	13	11	12	18	11	24	γ	15
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 33	TRUE	FALSE	2A 33	115	13	16	7 0	5	11	16	9	15	23	Υ	9
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 33	FALSE	TRUE	2A 33	131	14	10	15 11	11	11	13	11	14	21	Υ	6
Northern Region Aurora	Investigations / Northern Region / Woodstock Team 2A 33	FALSE	TRUÉ	2A 33	142	17	9	17 12			13	16	11	19	γ	10
Northern Region Aurora	Joliet Field Office 2A 50	TRUE	FALSE	2A 50	109	12	8	1 2			8	14	19	15	γ	8
Northern Region Aurora	Joliet Field Office 2A S0	TRUE	FALSE	2A 50	108	12	13	15 12			12	3	0	13		——
Northern Region Aurora	Joliet Field Office 2A 50	FALSE	TRUE	2A 50	147	12	16	12 13			9	15	26	18	Y	14
Northern Region Aurora	Joliet Field Office 2A 50	FALSE	FALSE	2A 50	6	6	0	0 0			0	0	0	0		
	Joliet Field Office 2A 50	FALSE	FALSE	2A 50	112	13	11	16 14	-	- 0	11	12	21	18	Y	
Northern Region Aurora		TRUE	FALSE	2A 50	95	- 1	4	10 18		- U	15	13	0	11		
Northern Region Aurora	Joliet Field Office 2A 50	FALSE	FALSE	2A 48	31	12	19	10 0			- 15	0	0	0	-	
Northern Region Aurora	JOLIET INVESTIGATION 2A 48			_	135		16			, v	15	14	18			
Northern Region Aurora	JOLIET INVESTIGATION 2A 48	FALSE	TRUE	2A 48		13				15				13	Ť	7
Northern Region Aurora	JOLIET INVESTIGATION 2A 48	FALSE	FALSE	2A 48	15	0	0	0 0		- 0	0	0	3	12		
Northern Region Aurora	JOLIET INVESTIGATION 2A 48	FALSE	FALSE	ZA 48		4	11		-	0			0	0		
Northern Region Aurora	JOLIET INVESTIGATION 2A 48	FALSE	TRUE	2A 48	155	15	19	15 14	21	11	12	13	21	14	Y	6

The state of the s				lan mi						-			,				
Northern Region Aurora	JOLIET INVESTIGATION 2A 48	TRUE	FALSE	2A 48	120	15	3	16	17					6 21	18	γ	9
Northern Region Rockford	Northern/ Rockford Team - 1A27	TRUE	FALSE	1A 27	106	7	13	- 11	- 5	10		12	2 1	2 13	11		
Northern Region Rockford	Northern/Rockford Team - 1A27	FALSE	FALSE	1A 27	17	16	1	0						0 0	0		
Northern Region Rockford	Northern/Rockford Team - 1A27	FALSE	FALSE	1A 27	89	18	19	10					-	0 0	0	Y	1
Northern Region Rockford	Northern/ Rockford Team - 1A27	FALSE	TRUE	1A 27	165	15	23	13						9 14	16	Υ Υ	20
Northern Region Rockford	Northern/Rockford Team - 1A27	FALSE	FALSE	1A 27	5	5	0	0	0	·			-	0	0		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	FALSE	FALSE	1A 38	77	12	12	8	10		-		1 (<u> </u>	0		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	TRUE	FALSE	1A 38	32	7		8	0				<u> </u>	0 10	0		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	FALSE	FALSE	1A 38	4	0	0	0)	0 0	4		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	FALSE	FALSE	1A 38	4	0	0	. 0			<u> </u>		0	0 0	4		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	FALSE	FALSE	1A 38	4	0	0	0	0		0		2	0	4	<u> </u>	
Northern Region Rockford	STERLING INVESTIGATION 1A 38	TRUE	FALSE	1A 38	4	0	0	0	0				-	0 0	4		
Northern Region Rockford	STERLING INVESTIGATION 1A 38	FALSE	FALSE	1A 38	116	9	10	9							0	Y	5
Northern Region Rockford	STERLING INVESTIGATION 1A 38	TRUE	FALSE	1A 38	99	6	9	12			13				5		-
Northern Region Aurora	WAUKEGAN INVESTIGATION 2#55	FALSE	FALSE	2A 55	1	0	0	. 0	0		0			0 0	1		
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a55	FALSE	FALSE	2A 55	20	0	0	0						0 8	12		
Northern Region Aurora	WAUKEGAN INVESTIGATION 2355	FALSE	FALSE	2A 55	117	0	2	4		18	14	14	10	6 22	17	Υ Υ	16
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a55	FALSE	FALSE	2A 55	43	13	12	13		0	0	0)	0 0	0		
Northern Region Aurora	WAUKEGAN INVESTIGATION 2955	FALSE	FALSE	2A 55	24	0	0	0	0					7 7	0	Y	2
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a55	FALSE	FALSE	2A 55	50	13	13	12						0	0		
Northern Region Aurora	WAUKEGAN INVESTIGATION 2±55	FALSE	FALSE	2A 55	39	13	13	13						0	0		
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a57	FALSE	TRUE	2A 57	135	13	13	13						2 16	20	Ą	6
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a57	FALSE	FALSE	2A 57	26	15	11	0					1	0 0			
Northern Region Aurora	WAUKEGAN INVESTIGATION 2a57	FALSE	TRUE	2A 57	202	19	22	21						9 22	20		19.
Southern Region East St. Louis	Investigations / Southern / Alton 4A95	TRUE	FALSE	4A 95	123	12	10	11						3 17	17	Υ	4
Southern Region East St. Louis	Investigations / Southern / Alton 4A95	FALSE	FALSE	4A 95	85	12	10	16			-			2 0	. 0		
Southern Region East St. Louis	Investigations / Southern / Alton 4A95	FALSE	FALSE	4A 95	117	9	12	17				. 12			15		3
Southern Region East St. Louis	Investigations / Southern / Alton 4A95	FALSE	FALSE	4A 95	121	10	10	12							17		3
Southern Region East St. Louis	Investigations / Southern / Alton 4A95	FALSE	FALSE	4A 95	100	0	0	4		-	-				19		4
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	FALSE	TRUE	4A 16	137	17	15	17						1 15	12		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	FALSE	FALSE	4A 16	69	0	0.	0	0						14	Y	4
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	TRUE	FALSE	4A 16	114	15	16	13.		19			1	12	7		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	FALSE	FALSE	4A 16	1	0	0	0	0)(1		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	FALSE	FALSE	4A 16	82	13	17	11				5	1	0	0		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A16	FALSE	FALSE	4A 16	34	0	0	5	10			0		0	0		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A93	TRUE	FALSE	4A 93	120	9	13	13		17				11	8	Υ	5
Southern Region East St. Louis	Investigations / Southern / Belleville 4A93	TRUE	FALSE	4A 93	120	15	15	13						7 12	9		
Southern Region East St. Louis	Investigations / Southern / Belleville 4A93	FALSE	FALSE	4A 93	74	0	D	0	0				+		15	Y	. 6
Southern Region East St. Louis	Investigations / Southern / Belleville 4A93	FALSE	TRUE	4A 93	140	15	14	17						14	16		1
Southern Region East St. Louis	Investigations / Southern / Belleville 4A93	FALSE	FALSE	4A 93	12	0	. 0	0						_2	10		
Southern Region East St. Louis	Investigations / Southern / East 5t Louis 4A14	TRUE	FALSE	4A 14	119	12	11	17	13				13		17		2
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A14	FALSE	FALSE	4A 14	102	7	8	13						101	7	Υ	3
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A14	FALSE	FALSE	4A 14	122	9	12	19						12	16		1
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A14	FALSE	FALSE	4A 14	112	9	8	17							16	Υ	1
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A14	FALSE	FALSE	4A 14	100	10	9	3	13						6		
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A92	FALSE	FALSE	4A 92	114	_ 11	11	10						15	13		
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A92	FALSE	FALSE	4A 92	97	11	9	7	13					4-	10		
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A92	FALSE	FALSE	4A 92	94	7	9	14	10						10		
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A92	FALSE	FALSE	4A 92	1	0	0	0	0	0				1	0		
Southern Region East St. Louis	Investigations / Southern / East St Louis 4A92	TRUE	FALSE	4A 92	110	10	12	11	13		15				15		
Southern Region Marion	Investigations / Southern / Effingham 5A92	FALSE	FALSE	5A 9Z	42	12	9	15			. 0			0	0		
Southern Region Marion	Investigations / Southern / Effingham 5A92	FALSE	FALSE	5A 92	127	10	9	15							19	Y	5
Southern Region Marion	Investigations / Southern / Effingham 5A92	TRUE	FALSE	5A 92	117	10	7	13							12		
Southern Region Marion	Investigations / Southern / Effingham 5A92	FALSE	FALSE	SA 92	129	10	10	11							22	Υ	8
Southern Region East St. Louis	Investigations / Southern / Granite City 4A24	TRUE	FALSE	4A 24	83	0	0	0	4						11		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A24	FALSE	FALSE	4A 24	26	0	0	0	0		0		1	9	11		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A24	TRUE	FALSE	4A 24	74	0	0	0	9						10		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A97	FALSE	FALSE	4A 97	124	13	11	15							14		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A97	FALSE	FALSE	4A 97	116	8	10	16				12		1 22	13		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A97	FALSE	FALSE	4A 97	78	11	10	20				1		1	10		
Southern Region East St. Louis	Investigations / Southern / Granite City 4A97	TRUE	FALSE	4A 97	118	9	12	17					12		13	Y	2
Southern Region East St. Louis	Investigations / Southern / Granite City 4A97	TRUE	FALSE	4A 97	125	9	11	16	9	15	11	11	13	18	12	Υ	3

Control Control	Francis Lands	In the second se	FALSE	FALSE	4A 97	111	13		14	***	11 12		10	24	441		
Southern Region		Investigations / Southern / Granite City 4A97	FALSE	FALSE	5A 96			_	14		1 12	8	10	14	11	- ,	
Southern Region		Investigations / Southern / Harrisburg SA96	FALSE	TRUE	SA 96	125 137					6 16	7	18	16	12	Y	5
Southern Region		Investigations / Southern / Harrisburg 5A96		FALSE				8	10		2 16	22	16	12	15	4	12
Southern Region		Investigations / Southern / Harrisburg 5A96	FALSE		5A 96	98					4 14	12	12	13	8	- 11	
Southern Region		Investigations / Southern / Harrisburg 5A96	FALSE FALSE	FALSE	5A 96				11		9 8	14	15	7	14	_ γ	2
Southern Region		Investigations / Southern / Marion SA76		FALSE	5A 76	96						10		-	14		
Southern Region	-	Investigations / Southern / Marion 5A76	TRUE	FALSE	5A 76	95			11		1 11	13	11	11.	5		
Southern Region		Investigations / Southern / Marion 5A76	FALSE	FALSE	SA 76	105					2 10	11	10	12	11		
Southern Region		Investigations / Southern / Marion 5A76	TRUE	FALSE	5A 76	89			9		0 12	8	9	8	9		
Southern Region		Investigations / Southern / Marion 5A76	FALSE	FALSE	5A 76	81		100	8		0 9	7	10	3	12		
Southern Region		Investigations / Southern / Marion SA76	TRUE	FALSE	5A 76	91			8		2 3	13	9	10	11		
Southern Region		Investigations / Southern / Marion SA77	TRUE	FALSE	5A 77	95			7		8 6	17	12	7	11	Y	2
Southern Region		investigations / Southern / Marion 5A77	FALSE	FALSE	5A 77	99			10		1 12	9	6]	6	14		
Southern Region		Investigations / Southern / Marion 5A77	FALSE	FALSE	5A 77	100			12		9 9	8	16	. 8	8	Y	1
Southern Region		Investigations / Southern / Marion SA77	TRUE	FALSE	SA 77	94					2 4	6	6	14	14		
Southern Region	Marion	Investigations / Southern / Marion 5A77	FALSE	FALSE	SA 77	108			7		1 11	9)	17	13	12	Y	2
Southern Region	Marion	Investigations / Southern / Marion 5A77	TRUE	FALSE	5A 77	105		- 20	11		8 10	12	14	9	13		
Southern Region	Marion	Investigations / Southern / Mt Vernon SA94	FALSE	FALSE	5A 94	118					2 17	9	12	10	16	Y	3
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A94	FALSE	FALSE	5A 94	102			12		1 14	8	14	7	12		
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A94	FALSE	FALSE	5A 94	110		7	12	10 1	0 19	11	13	9	8	Y	4
Southern Region		Investigations / Southern / Mt Vernon 5A94	FALSE	FALSE	5A 94	117			12		1 17	13	9	11	13	Υ	2
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A94	TRUE	FALSE	5A 94	102	10	11	4	7 1	0 13	15	6	12	14		
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A94	FALSE	FALSE	5A 94	112	10	12	12	9 1	6 18	10	11	9	5	Y	3
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A95	TRUE	FALSE	5A 95	97			9	8 1	6 7	8	6	10	12		
Southern Region	Marion	Investigations / Southern / Mt Vernon SA95	FALSE	FALSE	5A 95	110	12	9	11	11 1	7 7	. 7	15	12	9		
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A95	FALSE	FALSE	5A 95	103	11	. 10	8	12 1	6 9	7.	10	11	9		
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A95	FALSE	FALSE	5A 95	15	13	2	0	0	0 0	0	0)	0	0		
Southern Region		Investigations / Southern / Mt Vernon 5A95	TRUE	FALSE	5A 95	104	12	9	9	14 1	5 7	7	12	9	10		
Southern Region	Marion	Investigations / Southern / Mt Vernon 5A95	FALSE	FALSE	5A 95	109	13	9	7	12 1	4 9	10	13	10	12		
Southern Region		Investigations / Southern / Mt Vernon 5A95	TRUE	FALSE	5A 95	BO	10	7	9	7	4 6	8	12	6	11.		
Southern Region		Investigations / Southern / Murphysboro 5A78	FALSE	FALSE	5A 78	105	11	8	8	12	9 13	7	15	13	9		
Southern Region		Investigations / Southern / Murphysboro 5A78	FALSE	FALSE	5A 78	124	11	11	12	12 1	9 14	9	14	13	9		
Southern Region		Investigations / Southern / Murphysboro 5A78	TRUE	FALSE	SA 78	67	6	9	9	8 1	1 0	5.	12	1.	6		
Southern Region		Investigations / Southern / Murphysboro 5A78	FALSE	FALSE	5A 78	121		12	12		1 15	7	9	12	10		
Southern Region		Investigations / Southern / Murphysboro 5A78	FALSE	FALSE	5A 78	114	13	13	13		5 14	14	11	11	6		
Southern Region		Investigations / Southern / Murphysboro SA78	FALSE	FALSE	SA 78	19			0	0	0 0	0	0	10	9		
Southern Region		Investigations / Southern / Murphysboro 5A78	FALSE	FALSE	5A 78	94		9	13	9 1	2 11	8	7	10	6		
Southern Region		Investigations / Southern / Olney 5A93	FALSE	FALSE	5A 93	96		11	12		8 10	7	14	8	14		
Southern Region		Investigations / Southern / Olney 5A93	FALSE	FALSE	5A 93	112				14	9 8	11	11	13.	15	- 1	
Southern Region		Investigations / Southern / Olney 5A93	FALSE	FALSE	5A 93	85			10		1 10	8	8	5	11		
Southern Region		Investigations / Southern / Olney 5A93	FALSE	FALSE	5A 93	111		8	11	12 1:		10	16	10	13	~	
Southern Region		Investigations / Southern / Olney 5A93	FALSE	TRUE	5A 93	138			10	15. 1:		17	18	17	12	v	10
Southern Region		Investigations / Southern / Olney 5A93	FALSE	FALSE	5A 93	122			12	14 1		18	15	12	12	v	30
Southern Region		Investigations / Southern / Wood River 4A96	FALSE	FALSE	4A 96	62			13	10		6	0	0	0		
Southern Region		Investigations / Southern / Wood River 4A96	TRUE	FALSE	4A 96	115			12	11 1		10	12	14	11		
Southern Region		Investigations / Southern / Wood River 4A96	FALSE	FALSE	4A 96	112			15	8 1		10	9	13	13		
Southern Region		Investigations / Southern / Wood River 4A96	FALSE	FALSE	4A 96	127				11 14		6	15	18	14	v	2
Southern Region		Investigations / Southern / Wood River 4A96	TRUE	FALSE	4A 96	109		10	15	8 1		13	B.	15	10		3
Southern Region		Paired Team / Southern / Anna SA79	FALSE	FALSE	5A 79	82				8 1		11	5	0	14		
Southern Region		Paired Team / Southern / Anna 5A79	FALSE	FALSE	5A 79	79			- 0	3 1	6 6	- 41		11	12		
Southern Region		Paired Team / Southern / Cairo 5A06	FALSE	FALSE	5A 06	58			5	4	4 5	4	10	41	7		
Southern Region		Paired Team / Southern / Cairo SAUS	FALSE	FALSE	5A 06	61			- 0	2	5 6	- 41	10	4	5		
			FALSE	FALSE	4A 94	103		13	12	10	6 6	13	11	- 4	13		
Southern Region		Paired Team / Southern / Carlyle 4A94	TRUE	FALSE	4A 94	86			0	8 1		13	11	13	10	-	
Southern Region		Paired Team / Southern / Carlyle 4A94			4A 94	90			- 0		9 7	- 91	8			-	
Southern Region		Paired Team / Southern / Carlyle 4A94	TRUE	FALSE	4A 94				9	8 9		3 42	- /	11	12		
Southern Region		Paired Team / Southern / Carlyle 4A94	FALSE	FALSE		115		7-	13		9 9	12	11	11	12		
Sauthern Region		Paired Team / Southern / Metropolis SAOS	TRUE	FALSE	SA 05	112			14	13 10		9	- 6	17	9	Υ	2
Southern Region		Paired Team / Southern / Metropolis SA05	FALSE	FALSE	5A 05	1			0	1 (0 0	0	0	0	0		
Southern Region		Paired Team / Southern / Metropolis SA0S	FALSE	FALSE	5A 05	106			12	12 10		6	10	14	9		
Southern Region		Paired Team / Southern / Sparta 4A19	TRUE	FALSE	4A 19	90			1	6		3[14	11	11		
Southern Region		Paired Team / Southern / Sparta 4A19	FALSE	FALSE	4A 19	79			10		8 3	4	11	7	12		
Southern Region	East St. Louis	Paired Team / Southern / Sparta 4A19	TRUE	FALSE	4A 19	90	1 2	11	14	6 10	0 8	4	10	12	13		

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Southern Region East St. Louis	Paired Team / Southern / Sparta 4A19	FALSE	FALSE	4A 19	96	11	9	9	6	ol	7	6	12	13 17	4	

Exhibit 5

B.H. v. CALICA

IMPLEMENTATION PLAN TO ADDRESS INVESTIGATION CASELOADS

I. INTRODUCTION

Paragraph 26(a) of the *B.H.* Consent Decree ("Decree") states that investigators will be assigned no more than 12 new child abuse or neglect investigations per month during nine months of each calendar year, and no more than 15 new abuse or neglect investigations per month during the other three months of the year. Decree ¶ 26(a). Plaintiffs notified DCFS several months ago that the caseloads were substantially out of compliance with the requirements of the Decree in many parts of the State. The new DCFS Director, Richard H. Calica, acknowledged the problem and committed to addressing this serious issue. Pursuant to Paragraph 68(d) of the Decree, the parties have negotiated the following implementation plan, which they now submit for the Court's review and approval. If circumstances change, the parties agree to negotiate in good faith a revised plan.

II. THE IMPLEMENTATION PLAN

A. The Workforce

DCFS will bring caseloads for new investigations into compliance with *B.H.* standards statewide by January 1, 2013. DCFS has hired 7 new investigators and moved approximately 5 staff into investigator positions. DCFS began to train the newly hired investigators on or about June 25, 2012. DCFS anticipates the movement and training of other workers from within the Department into investigator positions will be completed by December 31, 2012.

By January 1, 2013, the Department will have added and filled approximately 117 new investigator positions. With these additional positions, the Department anticipates that assignments to investigators can be maintained at the levels required by the existing assignment provisions of the Decree.

B. Interim Plan

Until all new hires and workers from other divisions have successfully completed training, DCFS will do the following to bring caseloads into compliance with *B.H.* standards.

DCFS will hire on an emergency basis retired child protection employees throughout the State. Child protection workers who have retired since January 1, 2010, may be contacted. This contractual emergency hiring process is through the use of emergency contracts as permitted by applicable personnel rules. Emergency contracts with retirees may last for up to sixty (60) calendar days. Each retired employee may enter into only one such emergency contract. Once a retired employee agrees to a contract, background checks will be done. The background check process may take up to fourteen (14) days.

Once the employee's background check is completed and is satisfactory, that individual will be immediately assigned to perform investigations. The Department will repeat this process of recruiting and contracting with retired child protection employees every thirty (30) days. In furtherance of this interim ongoing process of utilizing emergency contracts and in order to maintain a pool of available retirees, current child protection employees who plan to retire in the near future have been and will be asked if they are willing to enter into emergency contracts. The use of these emergency contracts shall continue as permitted by state law and the collective bargaining agreement.

In addition, DCFS will temporarily assign approximately 103 workers who are currently working in non-investigative positions to investigator positions throughout the State. These individuals will be reassigned only if they have appropriate credentials for these investigator positions. There will be one 60-work day temporary assignment period. The temporary assignment period will begin in August 2012. The use of these temporary assignments shall continue as permitted by state law and the collective bargaining agreement.

DCFS will keep Plaintiffs' counsel informed of the emergency hiring and the temporary assignment and the adjusted investigative caseloads for all offices statewide following the implementation of the emergency hiring and temporary assignment. In addition, DCFS will authorize appropriate overtime for those investigators who are currently limited to a 37.5-hour work week.

C. Data Gathering and Analysis

The Department has redesigned the data collection system for reporting the assignment of new child abuse and neglect investigations. Reports generated using the new data collection system shall be provided on a monthly basis.

Until all positions referenced above have been filled, monthly reports will include, in addition to the number of newly assigned investigations each month, the number of pending investigations by investigator and by team.

The parties will meet monthly to discuss the status of this implementation plan. The parties will provide the Court with an interim report on the status of this implementation plan on or by October 15, 2012.