Office of Colorado’s Child Protection Ombudsman

LETTER OF COMPLIANCE CONCERN

Case Number 2019-3978

Stephanie Villafuerte,
Child Protection Ombudsman
January 29, 2020
Introduction

By design, the Office of Colorado’s Child Protection Ombudsman (CPO) serves as an independent, neutral problem solver that helps citizens navigate a complex child protection system in an expert and timely manner. The Ombudsman has independent access to child protection records that are not otherwise available to the public. This allows the CPO to objectively review and investigate complaints, deliver recommendations and drive systemic reform through research and education. Through objective study the CPO works to improve the delivery of services to children and families within the child protection system.

Jurisdiction

The CPO receives “complaints concerning child protection services made by, or on behalf of, a child relating to any action, inaction, or decision of any public agency or any provider that receives public moneys that may adversely affect the safety, permanency, or well-being of a child. The ombudsman may, independently and impartially, investigate and seek resolution of such complaints, which resolution may include, but need not be limited to, referring a complaint to the state department or appropriate agency or entity and making a recommendation for action relating to a complaint.” See C.R.S. §19-3.3-103(1)(a)(l)(A).

Pursuant to C.R.S. §19-3.3-101-110, the CPO does not have the authority to:
  • Investigate allegations of abuse and/or neglect.
  • Interfere or intervene in any criminal or civil court proceeding.
  • Review or investigate complaints related to judges, magistrates, attorneys or guardians ad litem.
  • Overturn any court order.
  • Mandate the reversal of an agency/provider decision.
  • Offer legal advice.

Identified Compliance Concerns

If, through the course of any case the CPO determines that an agency or provider may have violated any rules or laws, the CPO will issue a letter to the agency or provider outlining its compliance concerns. The agency or provider will be given 15 business days to provide a response to the CPO.

The CPO’s letter, and any response submitted by the agency or provider, will then be provided to the agency or provider’s supervising entity. The supervising entity will then make the final determination of whether a violation of law or rule occurred and provide any relevant remedies. The supervising entity will have 15 business days to make their determination and respond to the CPO. After the supervising entity submits its response, the CPO will post its letter, the agency or provider’s response and the supervising entity’s determination on the CPO’s website.
Public Disclosure

In meeting its statutory requirements to “improve accountability and transparency in the child protection system and promote better outcomes for children and families involved in the child protection system,” as stated in C.R.S. §19-3.3-101(2)(a), the CPO will provide the public and stakeholders any recommendations it makes to an agency/provider.

Impartiality

To maintain its impartiality – and in keeping with statute – the CPO will independently collect information, records and/or documents from an agency/provider when reviewing and/or investigating a complaint. “In investigating a complaint, the ombudsman shall have the authority to request and review any information, records, or documents, including records of third parties, that the ombudsman deems necessary to conduct a thorough and independent review of a complaint so long as either the state department or a county department would be entitled to access or receive such information, records, or documents.” See C.R.S. §19-3.3-103(1)(a)(II)(A)
Office of Colorado’s Child Protection Ombudsman

Letter of Compliance Concern

Case 2019-3978

(Delivered December 10, 2019)
To: Julie Krow, Director  
El Paso County Department of Human Services  
1675 West Garden of the Gods Rd., 3rd Floor  
Colorado Springs, CO 80907

From: Amanda Pennington, Child Protection Systems Analyst  
Office of Colorado’s Child Protection Ombudsman  
1300 Broadway, Suite 430  
Denver, CO 80203

Date: December 10, 2019

Subject: Possible Compliance Concerns, CPO Case 2019 - 3978

Dear Director Krow,

On November 5, 2019, the Office of Colorado’s Child Protection Ombudsman (CPO) was contacted regarding a child who spent the last year in foster care, despite having relative options available. The contact states that the El Paso County Department of Human Services (EPCDHS) has failed to make efforts toward reunification and to place the child in relative care. The family is concerned that the foster family will be given placement priority due to the EPCDHS’ delay in assessing family members who could serve as placement. As of December 2, 2019, the child remains in a foster home. The CPO has reviewed the available information regarding the family. The CPO has identified several areas in which the EPCDHS may not be in compliance with the requirements of Volume 7.¹

**Case Summary**

On November 22, 2018, the EPCDHS responded immediately to a report concerning the welfare of an infant due to the parents’ struggle with mental health issues.² The EPCDHS ultimately determined that a removal of the child was not warranted. The EPCDHS developed a safety plan to address the concerns and provide services to the family. On November 19, 2018, the safety plan failed and the EPCDHS initiated a court and child welfare case.³ The EPCDHS was granted custody and removed the child. The child was placed with a grandparent. On November 21, 2018, the court issued an order removing the child from the grandparent’s home and placed into foster care. As of December 2, 2019, the child continues to reside in foster care while the court and child welfare cases remain open.⁴

The following information was provided to the CPO by the family.⁵ The family reports that they have communicated to the EPCDHS their desire to be a placement option since November 2018.

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¹ Code of Colorado Regulations, 12 CCR 2509  
² See Trails Referral ID: Referral  
³ See Trails Referral ID: Closure Summary  
⁴ See Trails Case ID: FSP, Placement  
⁵ CPO received email on 11/14/2019
The family agreed to the EPCDHS’ formal request to be a placement for the infant in March 2019. The family explained that they were being relocated, due to military obligations. The family was informed by EPCDHS that they were no longer an option and would need to make contact with the EPCDHS when they were in a permanent situation.

The family settled in July 2019 and updated several EPCDHS staff members. The family reported that they were told placement decisions would be made at a future meeting.

The family reports an August 2019 conversation with the EPCDHS team in which they were told that it would be “cruel” to move the infant due to his attachment to the foster parents. The family insisted that a placement assessment be completed, as they were committed to keeping the infant in the family since the child’s removal.

The family reports that in September 2019, they were granted access to the court case along with two visits per week with the infant. The family reports that the placement assessment was completed in November 2019.

**Volume 7 Regulations and Children’s Code Requirements**

Volume 7 and the Colorado Children’s Code contain the minimum guiding principles and standards to which county human services departments are held in assessing and ensuring a child’s safety. The CPO found that the following rules are the most relevant to the identified compliance concerns: 7.300.1, 7.301.21, 7.202.1 and 7.304.52.

**Identified Compliance Concerns**

The CPO has reviewed the documentation in Trails along with the relevant rule package and sections of Volume 7. The CPO found several areas in which the EPCDHS may not be in compliance with state regulations. This information was last verified on December 5, 2019. Specifically, the CPO observed:

1. Documentation does not demonstrate that the family has been given the opportunity to participate in family engagement meetings since May 2019. If accurate, this is a violation of Volume 7, 7.300.1, as the county department is required to engage, support and maintain relationships with the family on an ongoing basis.

2. Documentation does not demonstrate that the family services plan was documented as created by the required 60-day timeframe. If accurate, this is a violation of Volume 7, 7.301.21 as the plan was due by January 11, 2019. The plan was documented as created on February 22, 2019.

3. Documentation does not demonstrate that the parents were contacted per the monthly requirements. Specifically, the parents were not contacted during the months of 2019 – January,

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6 Colorado Children’s Code 19-3-209
7 Trails: comprehensive child welfare information system
8 See Trails Case ID: Assessments, Framework
9 12 CCR 2509-4, Rule 7.300.1
10 See Trails Case ID: FSP, Treatment Plan
11 12 CCR 2509-4, Rule 7.301.21
June, July, August, September, October and November.\textsuperscript{12} If accurate, this is a violation of Volume 7, 7.202.1, as the county department was required to attempt either telephone or face-to-face contact until March 2019. In April 2019, the rule was changed requiring monthly face-to-face attempts.\textsuperscript{13}

4. Documentation does not demonstrate that the county department completed the required family search efforts.\textsuperscript{14} If accurate, this is a violation of Volume 7, 7.304.52, as the county is required to complete a search for relatives and inform the relatives of their options. Additionally, the county is required to make diligent search efforts every six months and document all efforts in the family services plan every 90 days.\textsuperscript{15}

Conclusion

Pursuant to policies 4.200 and 5.200 in the \textit{Colorado Child Protection Ombudsman’s (CPO) Case Practices and Operating Procedures}, the CPO will notify any agency or provider if it identifies potential violations of law or rule. The CPO will NOT make a final determination of whether the violation took place. Instead, the CPO will ask the relevant agency or provider to respond to the CPO’s concerns in writing.

After receiving the EPCDHS’ response, the CPO will submit its original letter and EPCDHS’ full response to the Colorado Department of Human Services (CDHS), which serves at the EPCDHS’ supervising entity. (See C.R.S. § 26-1-11 and C.R.S. § 26-1-118.) The CDHS will then determine whether any violations occurred and any relevant remedies. The CDHS will have 20 business days to make its determination and respond to the CPO in writing. After receipt of the CDHS’ response, the CPO will post this correspondence and both responses to the CPO’s website. All child and family information will be redacted prior to the public release.

Please provide the EPCDHS response to the possible violations listed in this letter no later than January 3, 2020.

Thank you for your time and please do not hesitate to contact me if you have any questions.

Sincerely,

\textit{Amanda Pennington}

Amanda Pennington
Child Protection Systems Analyst

Approved by:

\textit{Stephanie Villafuerte}

Stephanie Villafuerte
Child Protection Ombudsman

\textsuperscript{12} See Trails Case ID: \textit{Contacts}
\textsuperscript{13} 12 CCR 2509-3, Rule 7.202.1
\textsuperscript{14} See Trails Case ID: \textit{Contacts}
\textsuperscript{15} 12 CCR 2509-4, Rule 7.304.52
January 3, 2019

Amanda Pennington, Child Protection Systems Analyst
Office of Colorado’s Child Protection Ombudsman
1300 Broadway, Suite 430
Denver, Colorado 80203

Subject: Identified Compliance Concerns, CPO Case 2019-3978

Dear Ms. Pennington,

Please find this letter as the formal response to the above identified compliance concerns as well as additional information. [Redacted] was placed with his Maternal Grandmother from November 10th, 2018 to November 22nd, 2018 until the safety plan that had mitigated his removal was violated. The safety plan identified that Maternal Grandmother was not to allow parents to have unsupervised contact due to continued concerns of ongoing substance use. [Redacted] was court ordered to be and placed in foster care on November 22nd, 2018 and currently remains in the same placement.

Respondent parent’s participation in this case has been limited from the beginning. Parents had not attended a court hearing since the Shelter hearing and their whereabouts have been unknown which has a barrier to completing face to face contacts. Diligent searches were completed on November 10th, 2018 and May 7th, 2019 to try and locate parents to engage them in their case. [Redacted] last communication with the caseworker was in January 2019 when she was hospitalized in the ICU for a serious heart condition. Mr. [Redacted] last participated in an FEM in May 2019. Parents both signed releases in May 2019 but subsequently did not follow through with any services. Their phone numbers and addresses continually changed making it difficult for the caseworker to maintain contact with them. The caseworker has struggled with hearing that the parents are around, but not getting responses from them. A next FEM was scheduled in 90 days on August 7th but was cancelled when the parents did not appear. This case has been set the Termination of Parental Rights with a next court date of January 30th, 2020. In September 2019, Division 9 Judge Schutz allowed Respondent Parent Counsel to vacate their involvement with Mr. [Redacted] and Ms. [Redacted] as there has not been any information on their whereabouts. Respondent Parent Counsel had also hired an investigator to help locate the parents and were not successful in that.

The Family Service Plan was completed on February 8th, 2019 and adopted by the Court on February 22nd, 2019. The FSP was not entered into Trial by January 11th, 2019 in accordance with Volume IV Rules and Regulations because the disposition date was delayed in the court process. Due to the parents’ lack of attendance at court hearings, the case was set over for a contested trial. The case was set for a jury trial and then continued again when the parents did not attend court. This caused a delay in adjudication and in the caseworker completing the treatment plan.
On December 18th, 2019 Mr. [redacted] attended the court hearing and asked for a visit with his son. Prior to this court hearing, the Department arranged visitation for the paternal relatives—paternal aunt, grandma, and great-grandma on December 16th and December 17th. During the arranged visit at Mr. [redacted] request, Mr. [redacted] also brought his relatives. Despite requesting the visit, Mr. [redacted] was not engaged during the visitation.

Although this case is currently set for termination of parental rights, due to the involvement by the paternal side of [redacted] family, the Court will decide on January 30th, 2020 whether the case moves towards the termination of parent rights and continued placement with the foster adopt parents or an Allocation of Parental Responsibilities is granted to the paternal relatives. The paternal relatives have indicated that they are open to an APR. The Department continues to believe that termination of parental rights and subsequent adoption is the most appropriate permanency for [redacted] in any placement. [redacted] has had minimal to no relationship with his parents, and he is a one-year-old child.

The paternal aunt first had contact with the assigned caseworker in March 2019. At that time, they expressed that they were living in Texas, interested in placement, but would be moving to Tennessee in June or July of 2019 due to her husband’s military career. The caseworker informed her that once they had moved, she could initiate an ICPC to Tennessee. The paternal relatives then notified the caseworker on July 31st, 2019 that they had moved to Tennessee now. During a call with the Department on August 7th, with the Guardian ad Litem as well as the relatives, the paternal relatives offered to come and stay in Colorado for a time for the home study to be completed and to “speed up” the process. The caseworker and Guardian ad Litem informed the relatives that it would be a faster option. The following day, the relatives notified the caseworker that they preferred to have an ICPC completed instead of coming to Colorado for a kinship study. The caseworker submitted an ICPC on August 23rd, 2019 and it was sent to Tennessee on September 4th. The caseworker requested to expedite the ICPC, but Tennessee requires family to be foster care certified and it would not be eligible to be expedited. El Paso County received a letter from Tennessee ICPC on November 5th, 2019 stating that the placement will likely be approved, but the anticipated approval date is February 15th, 2020.

The paternal aunt came to the court date in September 2019 and the caseworker arranged visitation on September 6th and 9th while she was here. The Department requested discretion to begin visits with the relatives at the September 4th court date. The visits were then arranged to continue on an ongoing basis via facetime or Skype twice weekly. The aunt has been participating in Skype visits weekly since August with [redacted]. Paternal Aunt’s husband has not been a part of the Skype visits and has not come to Colorado to visit. This is a concern that the team has. The paternal aunt and paternal grandmother have come to Colorado to have visits with [redacted] in August and again in December. Family Engagement Meetings were held on this case on November 15th, 2018 (with paternal grandmother, [redacted] present), May 10th, 2019, and another was scheduled for August 7, 2019 but cancelled when parents did not attend. There is no documentation that the paternal relatives were invited to participate.

The Department continued to reach out to the paternal grandmother throughout the case to the best of their ability. The caseworker had been reaching out to attempt to schedule visits and had not heard back from Ms. [redacted] When she attended court in September, visits were arranged in person with the paternal aunt. The caseworker continued to reach out to set up monthly visitation with no response during the rest of September and October. The paternal aunt then gave the Department a new phone number. Once that was obtained, visits were held on November 5th, December 16th, and December 17th. It seems that the Department did not have current contact information for this relative between March and September.

Thank you for your time in this matter. If you have any questions or need additional information, please do not hesitate to contact me at 719-444-5602.
Sincerely,

[Lorrie Montoya's signature]
Lorrie Montoya
Child, Youth and Family Services Manager

[Catania Jones's signature]
Catania Jones
Child, Youth and Family Services
Child Welfare Administrator
Colorado Department of Human Services
Response Letter
Case 2019-3978
(Delivered January 28, 2020)
Stephanie Villafuerte  
Child Protection Ombudsman Colorado  
1300 Broadway Suite 340  
Denver, CO 80203

February 6, 2020

Dear Ms. Villafuerte,

We are providing this letter with the Colorado Department of Human Services, Division of Child Welfare (DCW) Response to the Child Protection Ombudsman (CPO) Complaint 2019-3978, regarding El Paso County Department of Human Services. Our office has reviewed this complaint, the county’s response, and relevant sections of Colorado Regulations 7.300.1, 7.301.21, 7.202.1, and 7.304.52 which are detailed below.

Concern 1: Documentation does not demonstrate that the family has been given the opportunity to participate in family engagement meetings since May 2019. If accurate, this is a violation of Volume 7 (7.300.1).

DCW response to concern 1: Colorado Regulations 7.300.1 states County departments of human/social services shall adopt family engagement practices. Family engagement means joining with the family/kin to establish common goals of safety, well-being, and permanency throughout the involvement and is inclusive of other systems. This is an overarching theme of practice throughout service assessment, planning, and delivery. Family engagement practice shall include, but not be limited to, family meetings, cultural responsiveness, and reflect the core principles listed. DCW is not in agreement with the violation to 7.300.1. According to Volume 7, 7.304.52 (D) A family engagement meeting shall occur within thirty (30) calendar days when any of the following conditions exist: 1. The child or youth is in a family-like permanent setting without the provider expressing the formal intent to provide legal permanence at the time that any of the following conditions exist: A. The child or youth has been in out-of-home placement fifteen (15) of twenty-two (22) months; or, B. The child or youth has had two (2) or more unplanned moves within a twelve (12) period; or, C. The child or youth is assigned a permanency goal of Other Planned Permanent Living Arrangement (OPPLA). 2. The child or youth is assigned a permanency goal in a non-family like setting without an approved permanency plan and any of the conditions in Section 7.304.52, (D), 1, a-c, exist. In 2019, the parents engaged in two (2) Family Engagement Meetings but failed to attend one (1), which was scheduled with them during a previous meeting. Although it may be best practice for family engagement meetings to be held regularly, this case did not meet the criteria of needing a required family engagement meeting based on what Colorado Regulations indicates.

Concern 2: Documentation does not demonstrate that a family services plan has been created. If accurate, this is a violation of Volume 7 (7.301.21) and the Colorado Children’s Code 19-3-209.

DCW response to concern 2: Volume 7, 7.301.21 (A) states The Family Service Plan document must be completed within sixty (60) days of the referral date in the automated case management system for children/youth. DCW is in agreement with the violation to 7.301.21 (A). The county did not complete the Family Service Plan document within sixty (60) days of the referral date.
Concern 3: Documentation does not demonstrate that the parents were contacted per the monthly requirements. Specifically, the parents were not contacted during the months of January, June, July, August, September, October, and November. If accurate, this is a violation of Volume 7 (7.202.1).

DCW response to concern 3: Volume 7, 7.202.1 (F), (1), states A face-to-face contact is defined as an in-person contact for the purpose of observation, conversation, intervention or interview about substantive case issues, such as safety, risk, and needs assessment, family service planning that may help to reduce future risk of abuse and neglect, and promote case progress and permanency. (A) face-to-face contact is required every month with (B). Parent(s)/Guardian(s) of the child(ren)/youth. DCW is not in agreement with the violation to 7.202.1 (F), (1). According to Volume 7, 7.202.1 (F), (2), The primary purposes for contacts with parents are to assess the parent(s) ability to provide safety for the child or youth and make progress toward family service plan goals. Such contact shall occur monthly and shall be a face-to-face contact completed by someone who has knowledge of the case and is employed or contracted with a county department of human/social services. The exceptions to monthly face-to-face contact with parents are as follows: (C). When the parent or permanent caregiver’s whereabouts are unknown despite efforts to locate the parent or permanent caregiver. Such efforts shall be documented in the state automated case management system. Volume 7, 7.202.1 (F), (3), states monthly engagement shall occur with all parents and permanent caregivers as determined by the county, regardless of ability or requirement to have face-to-face contact. This shall include monthly efforts to engage through telephone calls, letters, or electronic communication. At the time of the report written by the Child Protection Ombudsman, the attempted contact notes with the respective parents were not entered into the state’s case management system, however, they are entered at this time. Although it may be best practice for contact notes to be entered once a visit has occurred or shortly after, Colorado Regulation does not indicate a specific time frame that contact notes need to be documented. Due to the parent’s whereabouts being unknown throughout parts of this case, telephone calls and text messages were utilized as a form of attempting to contact parents. DCW would agree that these face to face contacts were not completed but that the county has now documented the attempted contacts during this time.

Concern 4: Documentation does not demonstrate that the county department completed the required family search efforts. If accurate, this is a violation of Volume 7 (7.304.52).

DCW response to concern 4: Volume 7, 7.304.52, A, 2, states Family search and engagement shall be completed within thirty (30) calendar days for all grandparent(s) and other adult relatives or the parent of a sibling of a child/youth who has been removed from his/her legal custodian’s home. Volume 7, 7.304.52, C, states Family search and engagement shall occur for all children including American Indian/Alaskan Native children and youth every six (6) months throughout the life of a case until the child or youth has achieved permanency. DCW is in agreement with the violation to 7.304.52, A, 2, & C. The child in this case was placed with kin for three (3) days prior to being placed in a foster home. Once the child was placed in the foster home, there is no documentation in the state’s Case Management System supporting any further family search and engagement. As reported by the El Paso County Department of Human Services, this case is currently in ICPC status and is documented in FSP 5A reviews noted on September 4, 2019, however, there is no documentation surrounding any other communication between this prospective placement and El Paso County.

DCW would note that in the case summary provided by the Child Protection Ombudsman it states, “On November 22, 2018, that EPCDHS responded immediately to a report concerning the welfare of an infant due to the parents’ struggle with mental health issues. The EPCDHS ultimately determined that the removal of the child was not warranted. The EPCDHS developed a safety plan to address the concerns and provide services to the family. On November 19, 2018, the safety plan failed.” These dates do not match as the safety plan could
not have failed on November 19, 2018 when it was not put in place until November 22, 2018. In reading through the case it appears that the notes indicate that the worker put a safety plan into place at the visit on November 12, 2018 and that this was documented in the state automated case management system as created on November 19, 2018.

DCW has developed a plan with the El Paso County Department of Human Services specifically with Lorrie Montoya, the manager for Children, Youth, and Families in El Paso County. There was a meeting held with the leadership team and the managers on January 13, 2020 and the supervisors in El Paso County will be auditing cases to address the timely completion of the Family Service Plan within 60 days. Another meeting will be held with the leadership team and the managers on January 27, 2020, to discuss Family Search and Engagement.

DCW will oversee and continue to provide supervision and guidance as needed. Please let us know if you have any further concerns or questions.

Sincerely,

Kari Daggett,
Deputy Director, Division of Child Welfare
### Grievance/Inquiry Review Form

[To be completed by the assigned Division of Child Welfare (DCW) County Intermediary]

<table>
<thead>
<tr>
<th>Unit/Intermediary</th>
<th>County: El Paso</th>
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<tbody>
<tr>
<td>Matt DeHerrera-Lopez</td>
<td></td>
</tr>
<tr>
<td>1-8-2020</td>
<td>02-06-2020</td>
</tr>
<tr>
<td>CPO Case 2019-3978</td>
<td></td>
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</tbody>
</table>

**Complainant Role (Select from the following):**
- Parent, Guardian, Legal Custodian
- Office of Colorado’s Child Protection Ombudsman
- Attorney
- Other: Specify Role: _________________________

**Comments:**
- Failure to facilitate Family Engagement Meetings with Parents; Failure to create Family Service Plan timely; Failure to have monthly contact with parents; Failure to provide family search and engagement.

**The basis of grievance/inquiry (mark all that apply):**
- Federal/State Statutory violation
- Administrative rule violation
- Other county practice, policy, procedure, etc. (specify): ___________________________________

**DCW assessment of county disposition of grievance/inquiry:**
- Agree with county disposition
- Disagree with county disposition

**DCW assessment of action/s taken by county:**
- Agree with action/s taken by county
- Disagree with action/s taken by county

**Action/s taken by DCW:**
- DCW did not find a violation of federal/state statute and/or of the administrative rules, therefore, no further action will be taken by DCW.
- DCW found the following violation federal/state statute and/or of the administrative rules:
  - 7.301.21 The failure to complete The Family Service Plan document within sixty (60) calendar days of the referral date in the automated case management system for children/youth.
  - 7.304.52 Family search and engagement shall be completed within thirty (30) calendar days for all grandparent(s) and other adult relatives or the parent of a sibling of a child/youth who has been removed from his/her legal custodian’s home.

**Based upon this finding, the following action/s will be taken by DCW:**

- Technical assistance (TA) and/or guidance (i.e. date, actions, next steps etc.):

  DCW has developed an action plan with the El Paso County Department of Social Services to provide technical assistance to address the timely completion of the Family Service Plan as well as conduct Family Search and Engagement within 60 days. DCW has developed a plan with the El Paso County Department of Social Services specifically with Lorrie Montoya, the manager for Children, Youth, and Families in El Paso County. There was a meeting held with the leadership team and the managers on January 13, 2020 and the supervisors in El Paso County will be auditing cases to address the timely completion of the Family Service Plan within 60 days. Another meeting will be held with the leadership team and the managers on January 27, 2020, to discuss Family Search and Engagement.

**Other(specify):**

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Printed Name AND Signature of DCW County Intermediary

Printed Name AND Signature of DCW County Intermediary Supervisor

Printed Name AND Signature of DCW Unit Manager

______ Date review form sent to county and client services  ______ (CPO Only) Date response sent