



State of Florida
Department of Children and Families

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DATE: June 13, 2021

TO: Regional Managing Directors
Sheriff Offices Conducting Child Protective Investigations
Community-Based Care Lead Agency CEOs

THROUGH: Taylor Hatch Deputy Secretary *Taylor Hatch*

FROM: Stefanie Camfield, Assistant Secretary for Child Welfare *Stefanie Camfield*
Robert Anderson, Assistant Secretary for Operations *Robert H. Anderson*

SUBJECT: CFOP 170-5, Chapter 4: Investigation Types and Use of the Family Functioning Assessment (FFA)

PURPOSE: The purpose of this memorandum is to provide notification of updates to CFOP 170-5, Chapter 4: Investigation Types and Use of the Family Functioning Assessment (FFA) which incorporates guidance around the new Streamline FFA Documentation process as recommended from the 2019 CPI Efficiencies Project.

BACKGROUND: As part of the 2019 CPI Efficiencies Project, the policy and practice guidelines surrounding our documentation in the FFA-Investigation were carefully reevaluated for consideration of a modified version aimed to allow CPI staff to have more time in the field to devote to working with our families rather than documentation obligations. As a result, a streamlined approach was created utilizing core criteria and internal processes that will allow for time saving efficiencies while still ensuring a full focus on child safety and care coordination for our families. These investigations still require a full investigative response and all associated tasks, while allowing for streamlined documentation of the FFA.

NEW INFORMATION: The updated CFOP Chapter outlines criteria for cases eligible for the Streamlined FFA Documentation process and provides guidelines for the documentation on cases qualifying for and being worked under the Streamlined FFA Documentation process. The criteria and guidelines for documentation within the new Streamlined FFA Documentation process are provided within CFOP 170-5, Chapter 4, Section 4-8.

ACTION REQUIRED: Please share this memorandum with all child protective investigations staff, sheriff offices conducting child protective investigations, and Community-Based Care Lead agencies.

CONTACT INFORMATION: If you have any questions regarding these procedures, please contact Brooke Bass, CPI Practice and Policy Manager, at Brooke.Bass@myflfamilies.com or 850-717-4643.

cc: Regional Family and Community Services Directors
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Chapter 4

INVESTIGATION TYPES AND USE OF THE FAMILY FUNCTIONING ASSESSMENT (FFA)

4-1. Types of Investigations. There are three investigation types in which a child has been alleged to be maltreated: “In-Home,” “Other,” and “Institutional.” The main determinants in identifying the type of investigation are the alleged maltreater’s relationship to the alleged child victim(s) and the setting or location at which the alleged maltreatment occurred.

4-2. Definitions.

a. An “In-Home” investigation is an intake in which the child’s parent, legal guardian (i.e., both permanent guardianship through s. [39.6221](#), F.S., and temporary custody of a minor through Chapter [751](#), F.S.), paramour (residing or frequenting the home) and/or other adult household member with significant caregiver responsibility for care and protection of the child is the alleged person responsible for the maltreatment. The child victim may reside in the household on a full or part-time basis. If the child’s parents or legal guardians have established separate households through divorce or separation, only the household in which the abuse is alleged to have occurred is assessed for danger threats and family functioning.

b. An “Other” investigation is an “In-Home” subtype which involves alleged abuse by a relative, non-relative, paramour, or adult babysitter temporarily entrusted with a child’s care who does not reside in the home with the parent and child. Similarly, human trafficking involving a non-parent as the alleged perpetrator is an “Other” investigation. When a parent is the alleged trafficker however, an “In-Home” investigation is required even though the parent may be trafficking the child at a location away from parent’s household. An “Other” investigation does not require a Family Functioning Assessment (FFA)-Investigation, but does require a Present Danger Assessment. The investigator’s responsibility in this type of investigation is to determine the appropriate maltreatment findings and assess whether or not the parent or legal guardian will take appropriate protective actions if the maltreatment is verified (i.e., change babysitter, not allow the relative to be in a caregiver role in the future, etc.).

c. An “Institutional” investigation involves alleged abuse by an “Other Person Responsible for a Child’s Welfare” (as defined in s. [39.01](#), F.S.) which typically occurs in institutional settings such as schools, daycares, foster care, residential group care or facilities. Family Functioning Assessments (FFAs) are not completed in Institutional investigations because the alleged maltreatment does not involve the child’s parent(s) or legal guardian.

4-3. Purpose of the Family Functioning Assessment. The Family Functioning Assessment (FFA) is the process by which investigators apply critical thinking skills to guide decision-making regarding child safety and risk based upon having an extensive and comprehensive knowledge of the individual and family conditions in the home. This process is summarized in six information domains and is essential to the investigator being able to accurately identify impending danger threats, assess the sufficiency of caregiver protective capacities, complete a safety analysis and implement a safety plan (as appropriate) and determine the risk for future maltreatment to the child(ren).

4-4. Required Use of the Family Functioning Assessment. An FFA-Investigation is required for all In-Home investigations except when the report is being closed out as a “Duplicate,” “No Jurisdiction,” “Patently Unfounded,” “False Report,” or when the subtype is determined to meet the criteria for and is changed to “Other.” Since Special Condition Referrals only involve problematic circumstances (e.g., parent hospitalized, Parent Needs Assistance, etc.) with no allegations of maltreatment, FFAs are not completed in those circumstances either.

4-5. Conditions Generating a Separate In-home Investigation. The investigator will need to contact the Hotline and generate a separate, subsequent "In-Home" investigation because of information obtained during an "Other" or "Institutional" investigation under the following conditions:

a. A child victim or collateral source interviewed in an Other or Institutional report also alleges maltreatment in the home setting by his or her parent or legal guardian.

b. The investigator determines a parent or legal guardian failed to act with due diligence to protect his or her child from maltreatment despite the parent having prior knowledge that an adult sitter or relative in an Other investigation, or Other Person Responsible for the Child's Welfare in an Institutional investigation, was abusing or neglecting the child.

c. An investigator determines during an Other or Institutional investigation that a parent or legal guardian does not recognize that the maltreater's ongoing access to the child represents an active danger threat and the parent or legal guardian refuses to take sufficient protective actions to ensure the child's safety despite being fully informed of the danger threat(s) posed by the person responsible for the maltreatment (in the Other or Institutional investigation).

d. There is reason to suspect that the individual responsible for maltreatment in an Other or Institutional report is abusing his or her biological or adopted children as well.

4-6. Relationship of Maltreating Caregiver to Child. The following additional situations involving a biological parent or legal guardian should also be treated as an "Other" report:

a. Permanent Guardianship cases in which the alleged maltreating caregivers were formerly the child's parents but no longer have legal custody and a new report is received alleging the child has been re-abused in that caregiver's custody (e.g., during visitation or the legal guardian has returned the child to the parent's home without a legal change in custody).

b. Permanent Guardianship cases in which the investigator determines the documented maltreatment involves one or more of the following conditions:

(1) The guardian's conduct toward the child or toward other children demonstrates that the continuing involvement of the guardian in the child's life threatens the life or safety of the child irrespective of the provision of services.

(2) The guardian's conduct is so egregious (e.g., deplorable, flagrant, or outrageous by a normal standard of conduct) as to threaten the physical, mental, or emotional health of the child.

(3) The guardian has subjected the child or another child to aggravated child abuse as defined in s. [827.03](#), F.S., or sexual battery or sexual abuse as defined in s. [39.01](#), F.S.

c. The maltreating parent resides out of state.

d. Child trafficking-by a non-caregiver (i.e., not biological parent or child's legal guardian).

4-7. Supervisor. When initiated, the pre-commencement supervisor consultation will affirm the investigator has sufficiently reviewed, to the extent possible, the roles and relationships in the investigation to determine the focus household and validate the type of report (i.e., In-Home, Other or Institutional) initiated by the Hotline.

4-8. Streamline FFA Documentation for In-home Investigations. The following criteria must be met in order to utilize the streamline FFA documentation process, procedures, supervisor consultations, and documentation in Florida Safe Families Network (FSFN).

a. Criteria. Use of the full Family Functioning Assessment to document the information obtained by the child protective investigator is not required when the following criteria have been validated:

(1) There are no children in the household of focus (whether notated as a victim or child) age 12 months or less. The presence of any child as an established household member who is 0-12 months of age requires the completion of the full FFA-Investigation.

(2) The investigation does not contain a child age 3 years or under (victim or child in the home) with a substance related maltreatment (substance misuse, substance exposed newborn, substance misuse-alcohol, substance misuse-illicit drugs, and/or substance misuse-prescription drugs).

(3) Present danger *has not* been identified at any time during the life of the investigation.

(4) Impending danger *has not* been identified and all children have been determined to be safe (unless criterion 5 applies below).

(5) Cases involving a new investigation in an *open*, ongoing case management services case (either non-judicial or judicial) when a multi-disciplinary staffing with the Community-Based Care (CBC) Case Management Organization (CMO) has been held prior to closure and documented in the "Meetings" tab in FSFN. However, if the case involves adding a new baby or child to the household, the CBC/CMO agency must also agree to add the infant/new child to the FFA-Ongoing. (Cases meeting this criterion will require the children to be unsafe if already open to ongoing case management or if the new child is being added to the FFA-Ongoing, and will require an accompanying safety plan).

(6) Investigations involving the death of a child in which there are no surviving children in the home.

b. Requirements. The following investigative tasks must be completed for in-home investigations that meet the streamline documentation criteria:

(1) The investigator must complete the pre-commencement activities (as outlined in CFOP 170-5, [Chapter 6](#)).

(2) The investigator must complete the Present Danger Assessment (as outlined in CFOP 170-5, [Chapter 13](#)) and document that no present danger threats have been identified in the home. Identification of present danger requires completion and documentation of the FFA-Investigation and precludes the use of streamlined documentation.

(3) All investigative activities outlined in CFOP 170-5, Chapters 14-19 (Initial Contacts and Interviews, Interviewing Children, Interviewing the Non-Maltreating Caregiver and Household Members, Interviewing the Alleged Maltreating Caregiver, Interviewing Collateral Contacts, and Observing Family Interactions respectively) must be completed and sufficiently documented in FSFN with the use of typed chronological notes accordingly.

(4) Information from all interviews must be typed and thoroughly documented within a FSFN chronological note type utilizing the established interview guide for sufficiency of information for any individuals that would be included on the full FFA. These interview notes may not be uploaded as attachments to ensure information is fully entered into the electronic record. Multiple participant

interviews completed at the same date/time/location can be included in a shared FSFN note with sections delineated for each.

(5) The investigator, in conjunction with a supervisory consultation, must determine the safety of the child(ren) in the home, utilizing the information gathered over the course of the investigation, and sufficiently documented in FSFN with the use of typed chronological notes accordingly. The safety determination must be based on the application of the core safety concepts and the totality of the conditions within the household including, but not limited to, the overall well-being of the child(ren) in regards to their mental health, emotional, educational and medical needs; the presence or absence of any danger threats; vulnerabilities of the child(ren); protective capacities of the caregiver(s); and, threshold criteria. This determination shall be documented within the first domain section, titled "Maltreatment and Nature of the Maltreatment," be confirmed by the reviewing supervisor prior to investigation closure, and documented in a closure supervisory consultation note.

(6) The investigator will determine appropriate finding(s) upon completion of the investigation, including presentation and documentation of credible evidence which supports or refutes child maltreatment for each alleged victim (as set forth in CFOP 170-5, [Chapter 22](#), Determination of Findings). These findings will be sufficiently documented in FSFN with the use of typed chronological notes accordingly.

c. Supervisor Consultation. Supervisory and Second Tier Consultations required as part of the standard investigation review process (as outlined in CFOP 170-5, [Chapter 26](#) and [Chapter 27](#)) must be completed. Additionally, a closure supervisory consultation must be completed and the closure consultation must include, at a minimum, verification of required investigative tasks, confirmation that typed chronological notes containing sufficient information to support the safety determination were included in the electronic file, and agreement with the final safety decision and usage of the streamline documentation process. The CPI Supervisor or Second Tier Reviewer may require a full FFA at any time during the investigation.

d. Documentation. The following documentation activities must occur in all in-home investigations that meet criteria for streamline documentation application.

(1) The investigator will document the Present Danger Assessment, compelling evidence, and corroborating information using FSFN functionality contained in case notes, per requirements for an in-home investigation.

(2) All information regarding investigative activities must be thoroughly documented in typed FSFN chronological notes. The completion and sufficiency of this information and its documentation must be confirmed by the reviewing supervisor prior to investigation closure and documented in a closure supervisory consultation note.

(3) The investigator will document all contacts and information obtained through interviews in case notes within two business days.

(4) The investigator will launch the "In-Home" investigative subtype in FSFN, launch the Family Functioning Assessment, and document the streamlined assessment in the body of the first domain section, titled "Maltreatment and Nature of Maltreatment." The summary should contain, at a minimum:

(a) An explanation of the household composition, including the relationship of the alleged maltreating caregiver(s) and victim(s).

(b) A concise summary of investigative tasks that directly impact the findings and safety outcome of the case including, but not limited to:

1. Interview(s) with household members, including the child(ren) and adult(s);
2. Overview of information provided by collateral contact(s), prior history, criminal history, callouts, etc. (if relevant or impactful), or the absence of concerning or related history; and,
3. Completion of any required staffings and outcomes, when available, including Child Protection Team, law enforcement, multi-disciplinary team staffings, subject matter expert staffings, etc.

(c) Documentation of maltreatment findings.

(d) Final safety determination for each child. The safety determination will be safe for all children unless the children are already under ongoing case management services or a new child is being added to an active ongoing services case as outlined in paragraph 4-8a(5) above, at which time the safety determination for these children will remain unsafe and an accompanying safety plan will be required.

(e) Summary of any referral(s) completed for the family.

(f) A statement that the in-home investigation met the criteria for streamlined FFA documentation and no further FFA domains were completed, and that further supporting assessment information is available in the FSFN chronological notes.

(5) The investigator may utilize "See Chronos" in the following FFA sections:

- (a) Child functioning;
- (b) Adult functioning; and,
- (c) Parenting/Behavior Modification.

(6) The investigator should document "See Maltreatment Domain" in the Child Safety Analysis Summary section of the FFA.

(7) The following should be utilized for radio button selections on the FFA:

(a) "No" for all listed danger threats (unless the children are already under ongoing case management services or a new child is being added to an active ongoing services case as outlined in paragraph 4-8a(5) above, at which time the appropriate danger threats will be identified, the safety determination for these children will remain unsafe and an accompanying safety plan will be required).

(b) Accurate determination and radio button selections should be made surrounding the "caregiver protective capacities."

(c) "Yes" for "Parent/Legal Guardian protective capacity determination summary."

(d) "Safe" for "Child Safety Determination." (The safety determination will be safe for all children unless the children are already under ongoing case management services or a new

child is being added to an active ongoing services case as outlined in paragraph 4-8a(5) above, at which time the safety determination for these children will remain unsafe and an accompanying safety plan will be required).

(8) The investigator will complete the “Results-Determination” drop down selection as appropriate.

(9) The investigator will launch and initiate the “Risk Assessment” at the start of the investigation, completing all known information as it becomes known. The risk assessment should be updated at the completion of interviews once information needed is known and utilized according to criteria outlined in CFOP 170-5, [Chapter 21](#).