



State of Florida
Department of Children and Families

Charlie Crist
Governor

George H. Sheldon
Secretary

DATE: October 9, 2009

TO: Regional Directors

THROUGH: Pete Digre, Assistant Secretary for Operations *M...*
David L. Fairbanks, Assistant Secretary for Programs *David L. Fairbanks*

FROM: Alan Abramowitz, State Director, Office of Family Safety *Alan Abramowitz*

SUBJECT: Accessing of Non-Assigned Intakes by Child Protective Investigators

PURPOSE: This memorandum addresses the practice of Child Protective Investigations staff routinely viewing intake information found on the Receiving Unit Intake screens prior to the intake being assigned to a specific individual.

BACKGROUND: Inspector General Investigation 2009-0051 initially dealt with the inappropriate accessing of information by an individual who had a personal interest in the outcome of the case. In the course of that investigation, it was also discovered that child protective investigators were routinely accessing child intakes prior to assignment. The Inspector General's report recommended that the Family Safety Program Office specifically address whether this practice should be considered a "legitimate business practice."

Current policy as defined in the Department's Security Agreement Form (CF 114 - bullet #8) requires that Florida Safe Families Network (FSFN) users will, "only access or view information or data for which I am authorized and have a legitimate business reason to see when performing my duties."

Accessing intakes prior to assignment, even when motivated by practical considerations like trying to plan for next day activities, is problematic. Reviewing intakes that *might* eventually be assigned to one party does meet the standard of 'Need to Know' which guides access to confidential information in our system. While the breach of confidentiality would be inadvertent, a more structured case assignment process virtually eliminates any chance of inappropriate disclosure from occurring in the first place.

REQUIRED ACTION: Circuit Administrators should review current practice in their respective areas regarding inadvertent violation of the 'Need to Know' standard.

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Mission: Protect the Vulnerable, Promote Strong and Economically Self-Sufficient Families, and Advance Personal and Family Recovery and Resiliency

Access to all intakes should be restricted to:

- ◇ case assignment staff
- ◇ child protective investigation supervisors (including acting)
- ◇ child protective investigation specialists
- ◇ managers responsible for investigative operations

Managers have the discretion to allow child protective investigators to review intakes prior to assignment if unique circumstances warrant it. For example, when normal operations are affected by natural disasters or when investigators are directed to check the Receiving Unit List prior to leaving a remote area/location of the county. These exceptions should be clearly delineated to staff.

Please disseminate this memo to all Family Safety staff within the Regions/Circuits/Sheriff's Offices.

CONTACT INFORMATION: Should you have any questions, please contact Chris Compton at 850-443-6646, or via e-mail at chris_compton@dcf.state.fl.us.