



Mandatory Reporting Task Force

June 26, 2024, Meeting Recap – Data Subcommittee

Overview

The Mandatory Reporting Task Force is legislatively charged with analyzing the effectiveness of Colorado's mandatory reporting laws in keeping children safe, connecting families with the resources they need, and providing clarity to mandatory reporters. Integral to this analysis, the task force will continue to examine the relationship of these laws to systemic issues and disproportionate impacts on under-resourced communities, communities of color, and people with disabilities.

Introduction and Break-Out Into Subcommittees

After an introduction with all attendees present, the task force broke out into its two subcommittees - on Specialized Occupations and Data - for more specific discussion.

This is the second meeting of the specialized occupations and data subcommittee. The Data Subcommittee focused on analyzing the personal information of a child collected in a report of abuse or neglect. Doris Tolliver had jury duty, so Mallory Huggins from Keystone filled in as facilitator.

Directive Background and Purpose

Bryan Kelley explained that the verb used in the directive is "to analyze," giving the task force flexibility to suggest recommendations or explore details further. There was some discussion on the motivation behind the directive, with insights from those present when the bill was created. The goal is to look at the demographic information of a child that is collected and address concerns about the disproportionality of children being reported to and entering the child welfare system.

Discussion on Data Collection in Child Welfare Systems

The discussion began with understanding current data collection processes. Colorado Statute Section [19-3-307\(2\)](#) regarding the personal information of a child collected for a report was shared with the group for reference.

Michelle Dossey mentioned that there had been requested follow up from the last meeting about Weld County's online reporting and more detailed information that was being gathered. Jessica Starr had pulled the report from Weld County, but it was not yet ready for sharing and will likely be available at the next meeting.

Panel Speakers

A panel of employees from the Colorado Department of Human Services was arranged for today's discussion to provide additional information on what data is collected in reports, and what is ultimately done with that data. Panelists introduced themselves, as captured here:

- *Jessica Starr* is the Research Analysis and Data Unit Manager at the Division of Child Welfare. Jessica highlighted her team's focus on the backend child welfare data system. They track data from hotline reports through to assessments and understand the implications of collected data throughout the life of a record.
- *April Jenkins* is the Child Protection and Prevention Services Unit Manager at the Division of Child Welfare. Her team handles the intake portion of child welfare, including taking initial reports through the hotline, making initial contact with families, assessing concerns for child abuse and neglect, and updating information in the Trails system.
- *JP Sleeper* is a Trails Product Manager. His role involves managing the transition from the Legacy system of Trails - the statewide automated child welfare information system - to the modernized version while supporting system operations and user needs.

Current Data Collection

Bryan provided information about the current data collection requirements found in 19-3-307(2). April confirmed that the intake case worker collects as much information as possible when a report is called into the child abuse hotline, ensuring the data is accurately reflected in the Trails system. The subcommittee also discussed the [recently passed](#) new data reporting requirements for the Colorado Department of Human Services, which must include characteristics such as race, ethnicity, disability status, LGBTQ identity (if applicable) and English proficiency.

Some of these data points (like English proficiency) were not previously collected and will be integrated into future procedures. The Division of Child Welfare is preparing to draft and update rules to align with House Bill 1046.

Demographic Data Collection

There was some discussion on how fields in Trails are not mandated, leading to potential inaccuracies when reporting parties make assumptions about a child's race or ethnicity.

Michelle Dossey highlighted an important but often missed component of the statute requiring mandated reporters to follow up oral reports with written reports. However, there is no consistent statewide mechanism for collecting and processing these written reports. Michelle suggested that the task force address this issue to provide clarity and consistency for reporting parties, using examples from practices in Arapahoe County.

Consistency in Reporting Processes

The group discussed whether it is feasible and beneficial to standardize the process of requiring written reports by mandated reporters across all counties.

Margaret questioned the necessity of the law requiring both an oral and a written report, considering it might be redundant and add unnecessary workload to reporting parties. Yolanda agreed with Margaret's view, stating that requiring a written report in addition to an oral one might no longer be necessary. The general consensus is that the additional written report requirement is not consistently followed and may not be as beneficial as initially intended.

The group decided to defer a discussion about the possibility of recommending the removal of the written report requirement from the statute. There was emphasis on ensuring that any changes still meet the needs of accurate and consistent data collection.

Challenges in Demographic Data Collection

Margaret Ochoa raised concerns about the accuracy of demographic information collected from different reporting parties. These parties might not have accurate reflections of how the child, youth, or family self-identify in demographic categories such as race, ethnicity, and tribal affiliation. If there isn't an opportunity to confirm this information with the family, it often remains inaccurate in the Trails system, impacting data integrity and understanding of disparities and disproportionalities within the child welfare system.

Michelle raised concerns about the challenges in accurately capturing data for multi-racial families within the Trails system. She noted that while there are fields for race and ethnicity, they may not fully accommodate multi-racial identities. Jessica Starr clarified that Trails allows for multi-select options for race and ethnicity, aligning with federal reporting requirements. However, Michelle mentioned previous feedback from case workers indicating limitations in entering data for multi-racial families, suggesting potential issues with the system's design. Yolanda Arredondo added that these categories are based on census standards, which may not fully reflect how individuals self-identify their racial backgrounds. Ensuring accurate data collection is crucial for developing effective policies and understanding the real impact on various communities.

The subcommittee discussed several *recommendations for system improvement, including possible options to:*

- Emphasize the need for confirming demographic information directly with families to ensure accuracy.
- Explore opportunities to update or correct demographic information in the Trails system throughout the case lifecycle.
- Consider the implications of current data collection practices and look for ways to improve accuracy to better serve families and understand systemic disparities.

Intersections with Other Recently-Enacted Legislation

There was a note regarding how this conversation intersects with [Senate Bill 24-200](#), which has additional requirements regarding characteristics such as disability status and language proficiency, which are not currently part of mandatory reporting statutes.

Differences in the Legacy and Mod Versions of Trails

Legacy Trails does not have the capability to accurately distinguish multi-racial families and different races and ethnicities. This limitation poses a challenge in properly identifying and categorizing families within the system.

JP outlined upcoming changes and modernization efforts in the Trails system. These changes present an opportunity to address current limitations and improve the accuracy and completeness of demographic data collection.

JP explained that the modernized Trails system (Trails mod) allows for multi-selection of demographic information, including race and other details. This capability is beneficial whether entering new individuals or updating existing records. Case workers can edit client information in Trails mod, even if initially entered in Trails Legacy, but initial entries for new individuals are typically done in Legacy, restricting multi-race selections until accessed in mod.

He tentatively mentioned a broad estimation of completing full modernization by the end of the next calendar year, but noted it as subject to change based on ongoing evaluations and efforts. He also said that the new system will be more easily customizable to accommodate reporting needs.

Need for Consistency

Margaret highlighted the need for consistency across directives to streamline operations within the Colorado Department of Human Services and expressed concern about the breadth of legislative mandates versus more targeted regulations. She emphasized the potential for integrating existing data collection efforts with new statutory requirements to address disparities effectively, although she expressed reservations about including income as a mandatory reporting criterion.

Michelle expressed concern about the reliability of data when reporting parties, such as mandatory reporters, may not accurately know or provide demographic information. She highlighted that in Arapahoe County, a significant portion of race and ethnicity data was missing, complicating efforts to accurately assess disproportionality.

Jessica emphasized the importance of Trails as a source of truth for child welfare data, stressing the need for accurate information to inform critical decisions and policies. She mentioned a pilot project that showed improvements in data accuracy when families' race and ethnicity information was updated based on direct communication during assessments. Both stressed the need for verification and minimizing assumptions to improve data integrity and address disparities effectively in child welfare practices.

Yolanda mentioned that while there are no specific checkboxes or fields for race and ethnicity in the initial intake form completed by mandatory reporters during hotline calls, information about race and ethnicity is often gathered and included in the narrative notes of the report. This means

that although it's not a mandatory data entry field at the initial stage, call takers do attempt to gather this information and document it in the narrative section of the report.

Yolanda also emphasized the importance of self-identification for youth, especially in terms of gender expression, sexual orientation, race, and ethnicity. This makes it particularly important to enable updating client records to accurately reflect these identities over time. She suggested that the task force might consider guidelines on how to handle discrepancies in identity between parents and children, ensuring that client records accurately reflect self-identified information across assessments and cases.

Trails Mod Demo

JP shared his screen with a fabricated example record from Trails to illustrate what information is collected in the system, providing a visual understanding of how data is recorded and managed within Trails. The information included:

- *Unique ID and Date/Time:* Each record has a unique numeric ID and timestamps for when the call was received.
- *County and Call Information:* Details include the responsible county, primary worker, call type (e.g., PA4, PA5), and call reasons. If substance use is involved, additional fields like "substance abuse analysis" become active.
- *Reporter Information:* Data collected from the reporter includes first name, last name, email, phone number, method type, and relationship to the case.
- *Family Information:* Information about the family involved in the report, such as names and relationships.
- *Mapping Feature:* A new feature allows case workers to interact with Google Maps to view the address entered, aiding in understanding the location and directions.
- *Client-Level Information:* JP noted that specific client-level information like race and ethnicity isn't explicitly listed in these fields but is typically included in the narrative description entered by case workers.

Alignment of Task Force Recommendations with Current Legislation

Bryan sought opinions within the task force on whether efforts should be made to ensure the alignment of House Bill 1046 and Senate Bill 200 with task force recommendations. Michelle and Margaret expressed support for integrating these statutes to streamline data collection practices across child welfare services. Yolanda highlighted concerns about burdening reporting parties with extensive data requirements, noting that this may not align with their primary responsibilities. The group acknowledged the complexity of these issues and the need for careful consideration in policy alignment to effectively address disproportionality in child welfare.

Addressing Initial Bias and Deficit-Based Systems

Yolanda raised a point about disproportionality starting at the front door with the initial reporting of incidents. She highlighted that different types of reporting parties, such as school districts or other entities, may exhibit biases that lead to disproportionate reporting of Black and Brown

children compared to their white counterparts. This disparity can occur even when rates of abuse or neglect are similar across different demographic groups.

Yolanda's concern underscores the idea that addressing disproportionality in child welfare involves not only analyzing outcomes within the system but also understanding and addressing biases and decision-making processes at the point of initial reporting. By considering how factors like race, ethnicity, and other demographic characteristics influence reporting decisions, child welfare systems can work towards more equitable practices from the outset, potentially reducing disparities in intervention and outcomes for children and families involved in the system.

Ida Drury emphasized that the current system often focuses on deficits and risks, and integrating family strengths into the reporting process could provide a more balanced view. She gave examples such as consistent school attendance, parental involvement in school activities, or other positive aspects of family life that could be reported by sources like schools. Ida noted that some counties already incorporate this approach in their screening processes and proposed considering ways to make it a statewide practice to better support families and improve reporting accuracy.

April Jenkins highlighted that within Colorado's differential response model, there exists an enhanced screening process that includes questions about family strengths. These questions are designed to capture positive aspects of family life, though their consistent completion may vary.

Types of Information Collected by Different Entities

In the discussion, Bryan raised the topic of what information gets collected and how data transmission occurs, particularly concerning reports from law enforcement and county departments of human services. He pointed out the upcoming overlap between the current discussion and their next conversation regarding directives for inter-agency communication, confirmation of report receipt, and potential outcome sharing with certain mandatory reporters.

Michelle outlined that mandatory reporters are required by statute to report every incident of abuse or neglect to either law enforcement or human services. The statute does not distinguish between intrafamilial abuse (where the perpetrator and child are related) and third-party abuse (where they are not), despite law enforcement typically handling third-party cases. This leads to a statutory obligation for cross-reporting where law enforcement must also inform human services if they receive abuse reports first.

The complexity arises in the practical implementation across different jurisdictions. For instance, in Arapahoe County, which encompasses 11 law enforcement jurisdictions, this requirement poses significant logistical challenges compared to jurisdictions like Denver, which has a single entity handling law enforcement. The sheer volume of approximately 30,000 calls per year necessitates efficient mechanisms for transmitting reports, which are not universally feasible across all counties. This statutory framework thus presents operational hurdles that vary based on jurisdictional capacity and infrastructure.

The group had general agreement on the following points:

1. *Alignment of Legislation*: Ensure that House Bill 1046 and Senate Bill 24200 are harmonized to reflect consistent requirements for data collection, including race, ethnicity, disability status, and other pertinent information.
2. *Integration with Rules and Regulations*: Update Volume 7 rules and regulations governing child welfare to align with the statutes, specifying how information should be collected both at the hotline intake stage and during assessments by case workers.
3. *Uniform Data Collection*: Establish uniformity in how data is requested and recorded across all stages of child welfare interactions, ensuring clarity and compliance with legal requirements.

Meeting Conclusion

The subcommittees then regrouped as an entire task force for meeting conclusion. There was no public comment. The CPO plans to conduct surveys to gather feedback and clarify positions on various issues related to data collection in child welfare systems. This will help in shaping final recommendations. The next meeting is scheduled for July 17th, indicating a continued focus on advancing discussions and finalizing recommendations.