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Bias-Free Child Removal Pilot Program 2024 Evaluation Report

Children and Family Research Center
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Bias-Free Child Removal Pilot Program

2024 Evaluation Report

A REPORT BY THE

CHILDREN AND FAMILY RESEARCH CENTER



School of Social Work

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The Children and Family Research Center is an independent research organization created jointly in 1996 by the School of Social Work at the University of Illinois at Urbana-Champaign and the Illinois Department of Children and Family Services. The goal of the Center is to identify research needs, support research that is policy and practice relevant, and encourage and facilitate public child welfare research activities through collaborative relationships.

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1. Introduction and Background

Public Act 102-1087, which became effective June 10, 2022, mandates that the Illinois Department of Children and Family Services (DCFS, the Department) establish a 3-year Bias-Free Child Removal Pilot Program for the purpose of promoting unbiased decision-making in the child removal process, while maintaining the safety of children and reducing risk, with the goal of decreasing the over-representation of Black children in out-of-home placements.¹ In addition, the Act requires the Department to establish a diverse, interdisciplinary steering committee to develop the Bias-Free Child Removal Program and create a written implementation plan by January 2024. The implementation plan must ensure a) organizational readiness, b) adequate data collection and analysis, c) professional development and training, and d) adherence to existing rules and laws concerning child safety. Other tasks assigned to the steering committee include the development of eligibility criteria for the program and a rubric for documenting the review team decision-making process.

According to the Act, the program must be implemented in DuPage County, Champaign County, and Williamson County for a period of at least three years. The Act further describes that each pilot county will appoint a Bias-Free Case Review Team (review team) that consists of a DCFS child protection supervisor, an area administrator, and a regional administrator. The role of the review team is to review and discuss the information from the investigation in order to make a decision on whether the child's removal from their home should be upheld or the child should be returned home to their parents. Prior to the review team convening, demographic and other information about the child and family is redacted from the case notes, intake summary, and investigation documents including names, race and ethnicity, sexual orientation and gender identity, religious affiliation, disability status of the parents, political affiliation, marital status of the parents, income level of the parents, and any reference to the neighborhood or county of the parents' address. In addition to the review team, the Act specifies the creation of an advisory board for each pilot county whose members will be present for all case reviews to ensure that the review teams execute their activities in accordance with the Act.

Finally, the Act requires an evaluation that examines the pilot program's implementation and its impact on the over-representation of Black children in child removals. According to the Act, the pilot program will be considered successful and expanded statewide if it is implemented with fidelity and the evaluation finds that it reduces the over-representation of Black children among child removals. Evaluation reports will be submitted to the General Assembly each year, with the first report due on January 1, 2025. The Department selected the Children and Family Research Center (CFRC) at the University of Illinois at Urbana-Champaign to design and conduct the evaluation of the Bias-Free Child Removal Pilot Program. The purpose of this first evaluation report is to: 1) describe the implementation activities that have been completed by the steering committee and the Department through December 2024; 2) describe the Bias-Free Child Removal Pilot Program; and 3) outline the data collection and analysis plan that will be used to evaluate the pilot program.

¹ <https://www.ilga.gov/legislation/publicacts/102/102-1087.htm>

2. Implementation Activities

2.1 Establishment of the Steering Committee and Working Groups

The Act required that by January 1, 2023, “the Department shall establish a steering committee consisting of an interdisciplinary, diverse group of child welfare professionals and advocates for the purpose of creating the Bias-Free Child Removal Pilot Program and the pre-implementation plan for the pilot program. The steering committee shall be diverse in regard to the geographic location, race/ethnicity, gender, and profession and lived experience of the committee members. The steering committee shall develop and oversee the implementation of the Bias-Free Case Review Team and bias-free removal process.”² Once established, the steering committee shall initiate implementation of the pilot program ensuring: organizational readiness, adequate data collection and analysis, professional development and training for staff, and adherence to existing rules and state laws concerning child safety. The steering committee shall include the following members: 1) a parent with lived experience in the child welfare system; 2) a former youth in care in the child welfare system; 3) a member of an organization that represents children in abuse and neglect proceedings; 4) a member of a community organization that advocates for parents’ rights within the child welfare system; 5) a university partner responsible for evaluating the pilot program; 6) five staff members from DCFS, including a child protection investigator and supervisor, the Deputy Director of Child Protection, the Deputy Director of Race Equity Practice, and the Deputy Director of Intact Family Services.

The steering committee began meeting in January 2023 has met every other week since then. The committee was initially co-chaired by Dagené Brown, Director of Racial Equity Practice at DCFS and Ashley Deckert, Director of Public Policy and Governmental Affairs at the Illinois Collaboration on Youth (ICOY). Ms. Deckert left ICOY in May 2023 and was replaced as co-chair by Dr. Tamara Fuller, Director of the Children and Family Research Center (CFRC). A list of the initial members of the steering committee and their roles is provided in Appendix A. In addition to the main steering committee, three workgroups were created to focus on specific tasks related to: 1) defining which allegations were eligible for the bias-free case review, 2) creating the case review team decision-making rubric, and 3) developing the training and other organizational readiness activities.

2.2 Exploration of Other Race-Blind Child Removal Programs

As part of the initial program development process for the bias-free child removal program, members of the steering committee met with individuals who were familiar with the “race blind” removal programs that were implemented in Nassau County, New York, and Kent County, Michigan. Dagené Brown and Ashley Deckert met with Dr. Jessica Pryce on February 10, 2022. Dr. Pryce was involved in the implementation of the race-blind removal program in Nassau County, NY, and her Ted Talk on this topic, entitled “To Transform Child Welfare, Take

² Bias-Free Child Removal Pilot Program Act, p. 6.

Race Out of the Equation” has over 1.3 million views.³ The conversation with Dr. Pryce included discussion of the Nassau County program design, program impact, and unintended consequences. Dr. Pryce did not have any outcome data from Nassau County to share with the Illinois DCFS team, but she stated that the data that her team captured was related to organizational culture improvement.⁴

On January 31, 2023, the steering committee met with Howard Knoll and Anita Shannon from Casey Family Programs who had worked with both counties on the implementation of their programs. Mr. Knoll shared that in Nassau County, one of the purposes of the program was to encourage the investigators to reconsider the family’s needs when making decisions about child removals, and if they were “on the fence” about removing the child, they would also think about what types of supports they could provide the family to prevent removal. This was a big departure from previous practice where there was not much discussion of wrapping the family in services and supports. Mr. Knoll also felt that the biggest lesson learned in the Kent County implementation was that the population where it was implemented was not well thought out. He said that there was no disproportionality in Kent County at the removal decision, and that the program should only be implemented in areas where there is documented disproportionality.

2.3 Logic Model Development

The steering committee began developing a logic model for the bias-free child removal pilot program soon after it began meeting in January 2023. The purpose of a program logic model is to clearly describe the relationship between a program’s *resources* (or inputs) and implementation *activities* (outputs) and its intended *outcomes*. Other parts of a well-developed logic model include specifying the *external conditions* that necessitate a change (sometimes called the problem statement); a *theory of change* or detailed explanation of how and why a program or intervention is expected to achieve its desired outcomes, outlining the causal chain of events leading from activities to long-term impacts; and potential side effects (both positive and negative) that should be monitored. The development of a logic model provides a blueprint for what information needs to be collected in the process and outcome evaluation of the program.

During the first few months of 2023, the steering committee consulted with numerous experts to gather the necessary information to develop the program logic model. The Children and Family Research Center provided data on the number of Black, White, and Latinx children who were taken into protective custody (PC) in the three pilot counties over the past several years. The CFRC provided additional data and consultation to the steering committee on the amount

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https://www.ted.com/talks/jessica_pryce_to_transform_child_welfare_take_race_out_of_the_equation?subtitle=en

⁴ See Pryce, J., Lee, W., Crowe, E., Park, D., McCarthy, M., & Owens, G. (2019). A case study in public child welfare: County-level practices that address racial disparity in foster care placement. *Journal of Public Child Welfare*, 13, 35-59. <https://doi.org/10.1080/15548732.2018.1467354>

of racial disproportionality for Black children in the three pilot counties at each investigation decision. This information provided the context for understanding the external conditions or problems that the bias-free child removal pilot program is intended to solve.

On September 6, 2023, the steering committee met with the developers of the SAFE (Safety Assessment and Family Evaluation) Model, which is the new safety assessment model that will be implemented statewide by the Department in 2024-2025, replacing the current Child Endangerment Risk Assessment Protocol (CERAP). During this meeting, the project leads described the different components of the SAFE model, including those focused on intakes at the child abuse and neglect hotline, the initial child protective services (CPS) response (investigation), and in-home safety plans (Safe @ Home). The implementation of the SAFE model is scheduled to begin with the hotline/intake module in June 2024, followed by the investigation modules in 2025. Because the SAFE model is intended to impact child safety outcomes, which are also included in the bias-free child removal program evaluation, it will be important to take this into account when examining the impact of both initiatives. The final version of the logic model is included in Appendix B.

2.4 Eligibility Criteria

During March, April, and May 2023, the steering committee considered which allegations should be eligible for inclusion in the bias-free child removal pilot program. The Act specified that certain cases should not be included in the pilot program, including those where protective custody is taken by law enforcement or medical personnel, cases that involve a forensic interview, cases that involve photos of injuries, and cases in which a child welfare court has made a determination on the issue of custody. The committee, in consultation with the Deputy Director of Child Protection, went over each of the abuse and neglect allegations currently in use by the Department and discussed if they could be included in the pilot program. The goal was to be as inclusive as possible so that the program could have a potential impact on the largest number of families. Once the final list of eligible allegations was determined, the steering committee created a form that will be completed by the child protection supervisor after protective custody is taken within a pilot county to determine if that case is eligible for a bias-free case review. This Bias-Free Removal Pilot Program Eligibility Checklist (see Appendix C) includes the eligible and ineligible allegations, as well as the other criteria that would exclude a case from receiving a case review (PC taken by law enforcement or medical personnel, forensic interview required, court determined custody, and photos of injuries required).

2.5 Timing of the Case Review Meetings

One of the early tasks that the steering committee completed was determining the timeline for convening a bias-free case review meeting. In order to make that decision, staff from the Department's Division of Child Protection (DCP) provided information to the committee about the current investigation and protective custody procedures. In the current procedures, a temporary protective custody can only be taken if an urgent and immediate necessity to remove the child from the home exists and reasonable efforts have been made or no

reasonable efforts could be made to prevent or eliminate the removal of the child from the home. Once protective custody has been taken, it is valid for 48 hours (excluding weekends and holidays) within which time a shelter care hearing must be held. The child protection specialist must find a temporary placement for the child and ensure that the child receives an initial health screening. In addition, the child protection specialist must enter all case notes into the investigation files and must complete the CANTS 33 Formal Referral for the State's Attorney to File a Petition for Juvenile Court Intervention and send it to the local State's Attorney's Office (see Appendix D for a copy of the CANTS 33). At the shelter care hearing, the judge decides whether the child should remain in the custody of the Department or should be returned home.

Once the shelter care hearing occurs, the decision about child removal and custody is determined by the judge and the Department no longer can change that decision. Therefore, the bias-free case review team meeting must occur during the 48-hour window after PC has been taken and before the shelter care hearing occurs. It was decided that the review team meeting must be held within 24 hours after the PC took place, so that it would not interfere with the 48-hour window for the shelter care hearing. To accommodate this short window of time, review team members and advisory board members must be able to meet on any given day during the Monday through Friday work week. It is therefore a requirement that all review team and advisory board members leave an hour of time open on their calendars every day in case a review team meeting needs to occur.

2.6 Redaction Processes

The Act specifies that the following information about the children and parents is removed from the case notes and intake summary: names; race and ethnicity; sexual orientation or gender identity; religious affiliation; disability status; political affiliation; marital status; income level; education level; and neighborhood location. The Act also states that the redaction of this information shall not be completed by the child protection investigator or supervisor.

The steering committee determined that DCFS legal department would perform the redaction of the required information. Therefore, if a case is eligible for a bias-free review, the CPS Supervisor will send the investigation packet (including the CANTS 33 and any other investigation information) to DCFS legal so that staff can redact the required information from the packet before it is sent to members of the bias-free review team, including: names, race and ethnicity, sexual orientation and gender identity, religious affiliation, disability status of the parents, political affiliation, marital status of the parents, income level of the parents, and any reference to the neighborhood or county of the parents' address. The redacted packet is sent to the members of the bias-free review team and the advisory board for that pilot county.

The steering committee also decided that the investigator and supervisor would not be present at the case review meeting and that the case review team members would not know their identities in order to reduce the possibility of influencing review team member's decisions. Therefore, the only information that the review team and advisory board members get about the investigation and the PC is what is included in the CANTS 33 and investigation summary. It is

therefore vitally important that investigators are very detailed in their descriptions of the safety threats that were present prior to the PC and the reasonable efforts that were made to prevent removal. Case review team members will not be allowed to assume that something happened if it is not included in the CANTS 33. If it is not on the page, it didn't happen and that will impact the review team decision, since the investigator will not be present at the meeting to ask questions. Emphasizing the importance of detailed information on the CANTS 33 and other documents will be included as part of the training on the bias-free child removal pilot program, but it is also best practice to include complete information on all documentation.

2.7 Decision-Making Rubric and Other Forms

The Act specifies that the Department will “develop a tool or rubric for the Review Team to fully document the decision-making process and what led to the final decision” (p. 11-12). A workgroup was created to develop this form that would be completed by review team members during the meeting. In addition to capturing information about the review team meeting (date of the PC, meeting starting and ending time), the goals of the rubric were to guide a robust discussion of the circumstance surrounding the PC and to allow each review team member to decide if all of the criteria for taking a PC had been met. Therefore, the rubric workgroup used the protective custody procedures that are outlined in the Department's Procedures 300 to develop the discussion questions included on the rubric. These questions included:

- 1) Was an immediate safety threat present prior to removal? If yes, please explain what the immediate safety threat was.
- 2) Was a safety plan considered? If no, please explain.
- 3) Was there a previous history with the Department?
- 4) Were reasonable efforts made to prevent removal? If yes, please explain what efforts were made. If no, please explain.
- 5) What documentation, outreach, or engagement with the non-offending parent were made?
- 6) Were in-home services considered or offered? Check all that apply (housing; cash assistance; food, clothing, furniture, other goods; childcare; emergency caretaker; homemaker; TANF referral; other (please describe). If no services were considered or offered, please explain.
- 7) If allegations 76, 77, 78, 82 were present, were Norman funds offered?

In addition, the rubric asks each review team member if they were able to determine (or reasonably guess) the race/ethnicity of the family from the information provided. Each member of the review team completes the rubric independently of the other members. Please see Appendix E for a copy of the Bias-Free Child Removal Review Team Rubric.

The role of the advisory board is to observe the review team meeting and ensure that there is fidelity to the intervention. Therefore, a separate form was created for the advisory board members to complete that focuses on the fidelity of the meeting. The questions on the Bias-Free Removal Pilot Program Advisory Board Monitoring Form (see Appendix F) are:

- 1) Was there information in the meeting that could lead a reasonable person to determine the race, name, gender, gender identity, sexual orientation, ethnicity, geographic location, socioeconomic status, religious affiliation or beliefs, political affiliation, or disability status of the child and/or parent or marital status and education level of the child's parent? If yes, please explain.
- 2) Was there adequate discussion of the protective custody? If no, please explain.
- 3) Was the review team decision factually based? If no, please explain.
- 4) Was the information discussed in the review team meeting sufficient for the review team to make a decision? If no, please explain what additional information was needed.
- 5) Was the decision unanimous from the start? Or did a review team member change their mind? What were the circumstances?
- 6) Did you agree with the review team decision? Please explain why or why not.

A third form was created so that the review team decision and recommendation could be communicated back to the investigator and supervisor who took the protective custody. After the review team meeting is completed, the regional administrator who participated in the meeting completes the Bias-Free Removal Pilot Program Case Review Team Decision Memo, which records the decision and whether it was unanimous or not, provides the team's rationale for making the decision, lists services that are recommended for the family, and includes recommendations to the original investigator and supervisor regarding improvements to best practices (see Appendix G).

2.8 Modification of Existing Policies and Procedures

Procedures 300 combines the rules and policies for conducting a child protective services investigation in Illinois. A new section in Procedures 300, Section 300.125, has been written that describes the purpose of the bias-free child removal pilot program, the steering committee, and the review team. This section will be inserted into Procedures 300 when the program begins.

2.9 Staff Training

Curriculum development for the Bias-Free Child Removal Pilot Program training began in April 2024. The curriculum provides an overview of Procedures 300, the bias-free review process, and all of the new forms. The training is designed to be virtual to ensure all participants in the review meeting are able to participate. Though the curriculum development is nearly complete, the addition of automated processes has extended the completion time, because these new automated processes need to be completed before they can be integrated into the training curriculum. It is anticipated that the training will take approximately four hours to complete and will include a role play exercise of a mock review team meeting.

2.10 Recruitment of Advisory Board Members

The Act mandates that a bias-free child removal advisory board be established that has knowledge and understanding of the Department’s policies, rules, and procedures and shall include: community-based partners from domestic violence, substance abuse, mental health, or housing; university partners; members of organization that advocates for parents and families; members of organizations that legally represent children involved in the foster care system in court proceedings; members of statewide organization that advocates on behalf of community-based services for children and families; parents with lived experience in the child welfare system; a former youth in care with lived experience in the child welfare system; and members of an organization that represents children in legal child abuse and neglect proceedings. These advisory board members will be present for all case reviews to ensure that the review team executes the case reviews in accordance with the Act. The advisory board members do not vote on the review team decisions.

Recruitment for advisory board members began in November 2023. Recruitment letters were sent to contracted agencies with DCFS, social services agencies, community-based agencies, lived experts, court personnel, and legislators. Several meetings were held with interested parties to explain the role and responsibilities of advisory board members. To date, individuals interested in serving as advisory board members includes former youth in care, birth parents, court appointed special advocates (CASA members), individuals from social service agencies, and attorneys. However, because advisory board members are required to be present daily at every review team meeting, it has been difficult to gain the commitment required for participation. To address this issue, a rotating schedule was created to allow members to have a 3-month break in between serving on the board. Advisory board members who are “lived experts” (i.e., parents or former foster youth who have experienced CPS involvement) will receive a \$25 stipend for each review team meeting they participate in.

2.11 Court and Stakeholder Engagement

The steering committee set up meetings with members of the State’s Attorney’s office in each of the three pilot counties. The meeting with Champaign County was on November 7, 2023, and was attended by steering committee co-chairs Dagen Brown and Tamara Fuller, two juvenile court judges (Judge Olmstead and Judge Lee), State’s Attorney Julia Rietz, Melissa Frydman from the University of Illinois College of Law, Rush Record from Champaign County CASA, and Chandler Mattison-Farris, Dually Involved Youth Specialist, Children and Families Division, Administrative Office of the Illinois Courts. The judges and State’s Attorney Rietz had several concerns about the bias-free child removal pilot program. Judge Olmstead had looked at the legislation and was concerned that the only criteria for success was reduction in the over-representation of Black children and not child safety. He said that the state has its own job and has an obligation to safeguard children. There were also several questions about when the information about the case will be sent to the court and if the timeline will be delayed because of the implementation of the review team meeting. They were assured that they will continue to get the case information (the CANTS 33 and other case materials) in the same way and at the

same time that they normally do. State's Attorney Rietz seemed especially skeptical about the program and viewed it as "interference" in her cases. She also asked several times if the program would review cases where PC was not taken but "should have been" because she sees those cases and thinks that there is potential bias there. She also said that the program would be a "slap in the face" to all current investigators.

The meeting with DuPage County was on November 8, 2023, and was attended by Dagene Brown, Judges Chantel Porter and Demetrios Panoushis, State's Attorney Nick Catizone, DCFS supervisor Nikki Eldred, DCFS Assistant Deputy General Counsel Kreig Taylor, Kathy McNamara (dually-involved youth probation), Kathleen Paravole (CASA supervisor), Peter King (guardian ad litem), Jennifer Seaholm (defense attorney), and Chandler Farris, Dually-Involved Youth Specialist, Courts, Children and Families Division, Administrative Office of the Illinois Courts. During this meeting, court staff had questions about the packet of information that would be available and if it was different than what is usually available for the shelter care hearing. In addition, questions were raised about past removals, whether reasonable efforts would be accounted for, and whether court personnel would be able to identify which cases went through a bias-free child removal review. They mentioned that they require an affidavit to be signed attesting that reasonable efforts were conducted. The defense attorney inquired whether they would also receive this information and whether the review team information could be subpoenaed. Additionally, they asked for a copy of the rubric discussion questions to provide feedback. The defense attorney inquired about cases that do not meet the legal burden at the shelter care hearing, the external factors that will affect the decisions of the review team, and what child protection investigators and supervisors are taught with regard to reasonable efforts. The judges at the meeting indicated they hear mostly allegations 10 and 60 cases in DuPage County and expressed concerns about the timing and how the decision will be shared.

The meeting with Williamson County was on November 13, 2023, and was attended by Dagene Brown and Tamara Fuller, Judge Andrea Gott, Teresa Machiaco-Hopkins (guardian ad litem), Allen Roe (parent attorney) Heather Dorsey, Director of the Courts, Children, and Families Division of the Administrative Office of the Illinois Courts, and Chandler Farris, Dually Involved Youth Specialist, Children and Families Division, Administrative Office of the Illinois Courts. Judge Gott wanted to know if she would be receiving any information from the review team and was informed that most of the information would be going through the State's Attorney office. She also wanted to know if the state would have "the final decision" about whether or not the PC is lapsed and was informed that they would. Ms. Machiaco-Hopkins was interested in the training that is being developed for the program and would like to take the training, if possible.

In addition to the engagement with the court personnel in the three pilot counties, informational flyers about the pilot program were created and sent to several stakeholder groups, including court stakeholders, all DCFS staff via the DNET, foster youth alumni, and community-based partners and legislators (please see Appendix H).

3. Description of the Illinois Bias-Free Child Removal Pilot Program

3.1 Current Investigation and Child Removal Procedures in Illinois

The processes currently used by the Illinois Department of Children and Family Services to receive and investigate reports of child abuse and neglect are described in a document known as Procedures 300.⁵ This section provides brief descriptions of current procedures for a) receiving calls of suspected abuse or neglect at the Hotline, b) conducting a child protection investigation, and c) taking temporary protective custody of a child during an investigation.

Receiving calls of suspected abuse or neglect. Calls of suspected child abuse or neglect are received by call floor workers (CFWs) at the Child Abuse and Neglect Hotline, which is a unit within the State Central Register (SCR) operated within the Division of Child Protection (DCP). When completing an intake, the CFW's main goals are to gather, sort, and process the necessary information from the reporter to decide if the criteria have been met for a child abuse or neglect report to be taken, and if so, what the appropriate response time for child protective services should be. According to Procedures 300 Section 300.30, the following criteria must be met for a report of abuse or neglect to be taken:

- An *eligible child victim* must be under 18 years of age or between 18-22 while living in a DCFS licensed facility.
- An *eligible perpetrator* for suspected abuse must be the child's parent, immediate family member, any individual who resides in the same home as the child, any person who is responsible for the child's welfare at the time of the incident, a paramour of the child's parent, or any person who came to know the child through an official capacity or is in a position of trust. For a report of suspected neglect, an eligible perpetrator must be the child's parent or any other person who was responsible for the care of the child at the time of the alleged neglect.
- There must be an *incident of harm or a set of circumstances that would lead a reasonable person to suspect that a child was abused or neglected* as described by the allegation definitions contained in Procedures 300, Appendix B.

Procedures 300, Appendix B identifies and defines the specific types of harm that are considered abuse or neglect in Illinois (see Table 1 for a list of the allegations).⁶ CFWs use the information in Appendix B to assist them in determining whether the conditions described by the reporter meet the definition for specific types of abuse or neglect. Some of the allegations may be coded as either abuse or neglect, while others fall into only one of the categories.

⁵ <https://dcfs.illinois.gov/content/dam/soi/en/web/dcfs/documents/about-us/policy-rules-and-forms/documents/procedures/procedures-300.pdf>

⁶ <https://dcfs.illinois.gov/content/dam/soi/en/web/dcfs/documents/about-us/policy-rules-and-forms/documents/procedures/procedures-300-appendix-b.pdf>

Table 1. DCFS Child Abuse and Neglect Allegations

Abuse	Neglect
1. Death	51. Death
2. Head Injuries	52. Head Injuries
4. Internal Injuries	54. Internal Injuries
5. Burns	55. Burns
6. Poisons/Noxious Substances	56. Poisons/Noxious Substances
7. Wounds	57. Wounds
9. Bone Fractures	59. Bone Fractures
10. Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare	60. Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare
11. Cuts, Bruises, Welts, Abrasions and Oral Injuries	61. Cuts, Bruises, Welts, Abrasions and Oral Injuries
12. Human Bites	62. Human Bites
13. Sprains/Dislocations	63. Sprains/Dislocations
14. Tying/Close Confinement	65. Substance Misuse
15. Substance Misuse	67. Mental and Emotional Impairment
16. Torture	74. Inadequate Supervision
17. Mental and Emotional Impairment	75. Abandonment/Desertion
18. Sexually Transmitted Diseases	76. Inadequate Food
19. Sexual Penetration	77. Inadequate Shelter
20. Sexual Exploitation	78. Inadequate Clothing
21. Sexual Molestation	79. Medical Neglect
22. Substantial Risk of Sexual Injury	81. Failure to Thrive (Non-Organic)
40. Human Trafficking of Children	82. Environmental Neglect
	83. Malnutrition (Non-Organic)
	84. Lock-out
	85. Medical Neglect of Disabled Infant
	86. Neglect by Agency
	90. Human Trafficking of Children

Investigation procedures. The CFW transmits the screened-in abuse or neglect report to the appropriate local DCFS field office within one hour of receipt of the report. Once the report is assigned to a child protection specialist, there are a number of activities required before they make an initial contact with the family. These include reviewing the entire intake summary sent by the SCR, conducting background searches on every person named in the report to look for previous involvement with the Department and a search of the Law Enforcement Automated Data System (LEADS), analyzing the information collected, and determining the next steps to ensure safety. The child protection specialist also contacts the reporter to obtain any additional information that is needed before initiating contact with the family. During the investigation, the child protection specialist is required to complete several activities:

- Make an in-person contact or a good faith attempt with the alleged victims within 24 hours of the receipt of the report at the SCR.
- Interview, observe, and thoroughly assess every alleged child victim and any other child subjects individually.
- Complete a safety assessment in accordance with Procedures 300.
- Attempt to establish in-person contact with the parents or caregivers of the alleged child victims the same day that the children are interviewed. If same day contact is not possible, contact must be attempted no later than 24 hours after they observe and assess the safety of the children.
- If the children are safe and the alleged perpetrators are different from the parents or caregivers, the child protection specialist can contact the alleged perpetrators within seven calendar days of the receipt of the report.
- Observe the environment and complete the Home Safety Checklist. Observations, including photographs, of all relevant environments must be used as evidence to support or negate the abuse or neglect allegation. A scene investigation must be completed.

When the child protection specialist has completed all required investigative contacts and has gathered all inculpatory and exculpatory evidence, they must consult with their supervisor and make a final finding determination. This determination shall be based upon whether the evidence gathered during the investigation and from the direct observations constitutes credible evidence of child abuse or neglect. If credible evidence exists, then the allegations are indicated; if not, the allegations are unfounded.

Protective custody procedures. Procedures related to taking PC of a child during an investigation are described in Section 300.120. These procedures are of particular interest for the Bias-Free Child Removal Pilot Program because they will be altered in the pilot counties in ways that are described in the next section. As described in Procedures 300, the Abused and Neglected Child Reporting Act (ANCRA) gives child protection staff, law enforcement, and treating physicians the power to take temporary protective custody of a child. Child protection specialists can only take temporary PC if they have reason to believe that 1) urgent and immediate necessity to remove the child from the home exists, 2) reasonable efforts have been made or no reasonable efforts could be made to prevent or eliminate the removal of the child from the home, and 3) there is insufficient time to obtain a court order under the Juvenile Court Act.

The child protection specialist contemplating taking a child into PC must evaluate the services available to the family. Before taking the child into PC, the child protection specialist and supervisor must conclude that in-home services would not protect the child from real and significant harm. The child protection specialist must consider offering services to the family which include, but are not limited to:

- Assistance in locating and securing housing;
- Cash assistance;
- Food, clothing, furniture and other goods and services;

- Childcare;
- Emergency caretakers;
- Advocacy with public and community agencies that provide social services;
- Homemaker services; and/or
- Referral to DHS, including the Temporary Assistance to Needy Families (TANF) program.

The Department shall make reasonable efforts to prevent the removal of any child because of the family's living conditions, inability to provide for their child's subsistence needs (e.g., lack of income, shelter, utility services, food, clothing, furniture), or any other safety concern with respect to the family's physical environment that the Department has considered in the decision to remove the child. Reasonable efforts to prevent the removal of the child when poverty is a factor include providing assistance in locating and securing temporary shelter, permanent housing, cash assistance, food, clothing, childcare, emergency caretakers or advocacy with public and community agencies providing such services.

If the child protection specialist determines that protective custody should be taken, they must document the following in a contact note:

- the reasons for removing the child;
- the reasons why services that were offered or rendered were not successful in preventing placement; or if services were not offered, why such services would not be successful in preventing placement; and
- the supervisory consultation of the decision to take protective custody.

Once protective custody has been taken, it is valid for 48 hours (excluding weekends and holidays) within which time a shelter care hearing must be held. The child protection specialist must find a temporary placement for the child and ensure that the child receives an initial health screening. In addition, the child protection specialist must enter all case notes into the investigation files and must complete the CANTS 33 Formal Referral for the State's Attorney to File a Petition for Juvenile Court Intervention and send it to the local State's Attorney's Office. At the shelter care hearing, the judge decides whether the child should remain in the custody of the Department or should be returned home.

3.2 Bias-Free Child Removal Procedures

The Bias-Free Child Removal process begins when protective custody is taken by a child protection specialist in a pilot county during an eligible investigation. Investigations that are ineligible for a bias-free review include: 1) cases where PC was taken by law enforcement or medical personnel, 2) cases that involve a forensic interview, 3) cases that require photographs of injuries, and 4) cases where the court has made a determination on the issue of custody. Table 2 highlights (in yellow) the allegations that are included in the bias-free pilot program.

Table 2. DCFS Child Abuse and Neglect Allegations

Abuse	Neglect
1. Death	51. Death
2. Head Injuries	52. Head Injuries
4. Internal Injuries	54. Internal Injuries
5. Burns	55. Burns
6. Poisons/Noxious Substances	56. Poisons/Noxious Substances
7. Wounds	57. Wounds
9. Bone Fractures	59. Bone Fractures
10. Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare	60. Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare
11. Cuts, Bruises, Welts, Abrasions and Oral Injuries	61. Cuts, Bruises, Welts, Abrasions and Oral Injuries
12. Human Bites	62. Human Bites
13. Sprains/Dislocations	63. Sprains/Dislocations
14. Tying/Close Confinement	65. Substance Misuse
15. Substance Misuse	67. Mental and Emotional Impairment
16. Torture	74. Inadequate Supervision
17. Mental and Emotional Impairment	75. Abandonment/Desertion
18. Sexually Transmitted Diseases	76. Inadequate Food
19. Sexual Penetration	77. Inadequate Shelter
20. Sexual Exploitation	78. Inadequate Clothing
21. Sexual Molestation	79. Medical Neglect
22. Substantial Risk of Sexual Injury	81. Failure to Thrive (Non-Organic)
40. Human Trafficking of Children	82. Environmental Neglect
	83. Malnutrition (Non-Organic)
	84. Lock-out
	85. Medical Neglect of Disabled Infant
	86. Neglect by Agency
	90. Human Trafficking of Children

The child protection supervisor is responsible for determining which PCs are eligible for a bias-free review team meeting (using the Bias-Free Review Eligibility Checklist) and notifying the child protection specialist. The child protection specialist completes the CANTS 33 form (Formal Request for State’s Attorney to File a Petition for Juvenile Court Intervention) as part of the packet of information that goes to the State’s Attorney’s Office. This should be done within the first 12 hours after PC is taken. In addition, the child protection specialist should ensure that the narrative portions of the CANTS 33 describe the evidence to support PC and the reasonable efforts that were taken to avoid PC.

If a case is eligible for a bias-free review, the CPS Supervisor will send the investigation packet (including the CANTS 33 and any other investigation information) to DCFS legal so that staff can

redact the required information from the packet before it is sent to members of the bias-free review team, including: names, race and ethnicity, sexual orientation and gender identity, religious affiliation, disability status of the parents, political affiliation, marital status of the parents, income level of the parents, and any reference to the neighborhood or county of the parents' address. The redacted packet is sent to the members of the bias-free review team and the advisory board for that pilot county. The bias-free review team meeting will be held within 24 hours of PC being taken (excluding weekends and holidays). The review team will discuss the circumstances surrounding the PC using the discussion questions listed on the Bias-Free Child Removal Review Team Rubric Form and will complete the information on the Rubric Form independently of one another. After the discussion, they will vote whether to uphold or overturn the PC, with the majority vote required for a decision. The review team can also recommend that the family be referred for Intact Family Services or court-ordered supervision. The review team decision and recommendations shall be communicated to the child protection investigator and supervisor, the regional administrator, and the State's Attorney's Office via the Case Review Team Decision Memo. Please note that the State's Attorney may choose to file a petition for child removal regardless of what decision was made by the Bias-Free Child Removal Team. Advisory board members will observe the review team meeting and each member will complete the Advisory Board Monitoring Form. Advisory board members do not participate in the discussion or vote on the PC decision. In the event that no advisory board members are able to attend the review team meeting due to scheduling conflicts or other reasons, the review team meeting will proceed without them.

3.3 Bias-Free Child Removal Program Logic Model

The theory of change for the Bias-Free Child Removal Pilot Program is outlined in the logic model for the program (see Appendix B). In Illinois, Black children are over-represented in the Illinois child welfare system at each decision point during a child protection investigation compared to their representation in the general child population. An annual report produced by the Children and Family Research Center at the University of Illinois at Urbana-Champaign examines the amount of racial disproportionality in the Illinois child welfare system by computing a racial disproportionality index (RDI), which compares the percentage of children in a racial or ethnic group involved in a specific part of the child welfare system to the percentage of that racial group in the Illinois child population. The results of the most recent report show that Black children in Illinois were over-represented in investigations, protective custodies, indicated investigations, intact family service case openings, and substitute care entries at over twice their proportion in the Illinois child population.⁷

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https://cfr Illinois.edu/pubs/rp_20240926_RacialAndEthnicDisproportionalityInTheIllinoisChildWelfareSystemFY2024Report.pdf

Theory of change. According to the theory of change outlined in the logic model, one of the reasons (but not the only reason) that Black children are over-represented in the child welfare system is because of implicit bias. Implicit biases are “unconscious mental processes that lead to associations and reactions that are automatic and without intention and actors have no awareness of the associations.”⁸ Implicit biases related to Black families impact judgments, decisions, and behaviors of individuals involved with the child welfare system, including mandated reporters; child welfare workers, supervisors, and administrators; and attorneys, judges, and other court personnel. According to the theory of change, negative implicit biases related to Black families and children lead to a larger number of Black children being reported to the child abuse and neglect hotline, investigated for abuse and neglect, taken into protective custody during an investigation, and eventually entering the substitute care system, which results in their over-representation in these outcomes compared to their representation in the child population. Because implicit biases work at an unconscious level, removing all information related to race, ethnicity, neighborhood, income, and other socioeconomic indicators from that available to child welfare system decision-makers will eliminate this bias from their decision-making and reduce the number of Black children who are removed from their homes in protective custodies. This, in turn, will reduce the amount of over-representation of Black children removed from their homes.

Resources and Implementation. In order to eliminate implicit bias from the decisions related to protective custody, the bias-free child removal program will be implemented in three pilot counties (DuPage, Champaign, and Williamson). The Illinois Department of Children and Family Services (DCFS) will invest numerous resources and engage in a range of activities to develop and implement the Bias-Free Child Removal Pilot Program. Resources include a supportive and inclusive DCFS leadership team; a Steering Committee that guides the development and implementation of the program; staff to redact the required information from the investigation case files; development of rules, policies, and procedures; communication and engagement with court and community partners; program evaluation; staff training; and staff supervision.

Outputs. As a result of these resources and implementation activities, the following outputs will occur:

- Children in all eligible investigations who have been taken into PC will receive a bias-free child removal review within 24 hours after being taken into PC.
- The review team members will review information about the investigation minus any information related to the child and parents’ race and ethnicity, sexual orientation and gender identity, religious affiliation, disability status of the parents, political affiliation, marital status of the parents, income level of the parents, and any reference to the neighborhood or county of the parents’ address.
- The review team members will have a robust discussion of the information to determine if a) there was an urgent and immediate safety threat prior to removal and b) if reasonable efforts were made to prevent removal.

⁸ Staats, C. (2015). State of the Science: Implicit Bias Review 2014.
<https://kirwaninstitute.osu.edu/sites/default/files/documents/2014-implicit-bias-review.pdf>

- After reviewing and discussing the information about the case, the review team votes whether to uphold the PC and continue with the shelter care hearing or to overturn the PC and return the child home. It is anticipated that some PC decisions will be overturned as a result of the bias-free review process.

Outcomes and Potential Side Effects. It is anticipated that a portion of the PCs among Black children in the pilot counties will be overturned, which will in turn lead to a decrease in the RDI for Black children in protective custodies. It is hypothesized that this decrease in the over-representation of Black children in PCs will be accomplished without any negative impact on child safety in the counties (as measured by re-reports to the child abuse and neglect hotline). It is possible that the intervention may also impact the number of PCs that are taken in the pilot counties, as well as the RDI for children in other racial or ethnic groups. In addition, a decrease in the number of Black children taken into PC in the pilot counties may also impact the number and percentage of Black children who enter substitute care.

4. Evaluation Plan for the Bias-Free Child Removal Pilot Program

The Illinois Department of Children and Family Services has partnered with the Children and Family Research Center (CFRC) at the University of Illinois at Urbana-Champaign to design and conduct a comprehensive evaluation of the Bias-Free Child Removal Pilot Program. Public Act 102-1087 requires an evaluation of the program that:

- describes the implementation process (implementation evaluation),
- determines if the program was implemented with fidelity (fidelity assessment), and
- assesses the impact of the program on racial disproportionality in child removals and child safety (outcome evaluation).

4.1 Implementation Evaluation

Purpose and Research Questions. The purpose of the implementation evaluation is to thoroughly describe the activities that are undertaken to implement the Bias-Free Child Removal Program in each of the three pilot counties and to document the contexts in which implementation occurs. Implementation research suggests that it is vital to examine how well an intervention is implemented in order to understand the intervention's outcomes, because an intervention or treatment will not be effective if it is not implemented well. In other words, if an intervention does not achieve the desired outcomes, it is important to know if the failure occurred because the intervention was ineffective (intervention failure) or if a good intervention was implemented poorly or encountered insurmountable barriers (implementation failure).⁹ In addition to providing important information that will help us understand the outcomes of the intervention, the implementation evaluation will provide early feedback from a range of individuals that can suggest what modifications to the intervention or additional supports might be needed if the Bias-Free Child Removal Program is implemented in additional counties.

The implementation science literature suggests that implementation occurs in discernible stages or phases. Although implementation frameworks label these stages differently, there is general consensus that all intervention efforts include stages of exploration, adoption/preparation/installation, implementation, and sustainment.¹⁰ In addition, these frameworks suggest that effective implementation is supported by core activities that are present during each stage of implementation, including: 1) building and using implementation teams to lead efforts; 2) using data and feedback loops to drive decision-making; and 3) developing a sustainable implementation infrastructure. Research suggests that implementation infrastructure, which includes the skills and characteristics of the *individuals*

⁹ Proctor, E., Silmere, H., Raghavan, R., Hovmand, P., Aarons, G., Bunger, A., Griffey, R., & Hensley, M. (2011). Outcomes for implementation research: Conceptual distinctions, measurement challenges, and research agenda. *Administration and Policy in Mental Health and Mental Health Services Research, 38*, 65-76.

¹⁰ Metz, A., Naom, S.F., Halle, T., & Bartley, L. (2015). An integrated stage-based framework for implementation of early childhood programs and systems (OPRE Research Brief OPRE 2015-48). Washington, DC: Office of Planning, Research, and Evaluation, Administration for Children and Families, U.S. Department of Health and Human Services.

and the overall functioning of the *organization*, are both necessary for effective implementation.¹¹

Although DCFS is a state administered child welfare system, meaning that child protective services in each county follow the same rules and procedures, counties vary in numerous ways that may impact the implementation of a new initiative, including differences in court processes and personnel (judges and State's Attorneys). The implementation evaluation will therefore treat each of the three pilot counties as individual case studies and will collect information to answer the following research questions:

1. Was the Bias-Free Child Removal Program implemented as planned in each of the pilot counties?
2. What were the barriers to implementation in each county?
3. What facilitated implementation in each county?
4. What was the role of the steering committee in guiding implementation activities?
5. How did organizational leadership support implementation?
6. How was buy-in for the program solicited from DCFS staff? From other partners essential to the success of the program, such as court personnel?
7. What training was provided to staff and community partners? Was it effective?
8. How was data used to improve program functioning during the initial implementation phase?
9. How did the organizational culture and climate impact implementation in each pilot county?
10. Were there other initiatives that impacted the implementation of the Bias-Free Child Removal program? If so, what were they and how did they impact implementation?

Data Collection Methods: The primary method of data collection for the implementation evaluation will be through qualitative interviews and/or focus groups conducted with those who are involved in the program's implementation: DCFS administrators involved with the program, steering committee members, review team members, advisory board members, child protection investigators and supervisors, area and regional administrators, and court personnel (judges and State's Attorneys). CFRC will work collaboratively with DCFS to develop a list of individuals and groups to include in the sample for the interviews and focus groups within each pilot county.

The focus groups and interviews will be conducted at two time points; the first will be approximately 4-6 months after the program begins (the initial implementation stage) and the second will be in the last year of the 3-year pilot period. Informed consent will be obtained from all participants before the focus groups or interviews begin. Each of the focus groups and interviews will be recorded and transcribed for qualitative data analysis. The interview and focus group protocols are provided in Appendix I.

¹¹ Metz et al., 2015.

4.2 Process Evaluation and Fidelity Assessment

Purpose and Research Questions: The purpose of the process evaluation/fidelity assessment is to determine if the bias-free child removal pilot program is implemented as intended. More specifically, the fidelity assessment will answer the following research questions:

1. Do all eligible protective custodies receive a bias-free review team meeting?
2. Do the bias-free review team meetings occur within the required time frame?
3. Is the required information redacted from the investigation information that is provided to the bias-free review team members?
4. Are all required members of the review team and advisory board present during the meeting?
5. Is there information discussed in the meeting that would lead a reasonable person to be able to determine the race of the people involved in the protective custody?
6. Does the review team hold a robust discussion about whether or not the PC was necessary to protect the child from an immediate safety threat?
7. What number and percentage of the PCs that are reviewed are overturned and what number and percentage are upheld?
8. How many of the PCs that are overturned by the review team are later upheld by the SAO?
9. What percentage of families reviewed are referred for intact family services?

Data Collection Methods: Data for the fidelity assessment will be collected through several different methods:

1. Administrative data and child protection supervisor logs will be used to determine if all eligible PCs received a review.
2. Review team members will complete the Bias-free Child Removal Review Team Rubric during the meeting, which contains information about the meeting.
3. The advisory board members at the meeting will complete the Advisory Board Monitoring Form that documents their assessment of the quality of the discussion and whether or not the race of the family could be determined.
4. Members of the evaluation team will observe a percentage of randomly selected review team meetings and complete a structured observation form.
5. Court petition filings will be used to determine the final outcome of the PCs.

4.3 Outcome Evaluation

Purpose and Research Questions: The primary goal of the outcome evaluation is to examine the impact of the bias-free child removal pilot program on the over-representation of Black children in protective custodies and entries into substitute care, as measured by the racial disproportionality index (RDI) for Black children. The outcome evaluation will also examine the impact of the program on other outcomes such as child safety, the number of children taken

into PC, and staff awareness of biases in CPS. The following research questions will be answered:

1. Does the implementation of the Bias-Free Child Removal Program have an impact on the over-representation (RDI) of Black children in protective custodies and substitute care entries in the pilot counties?
 - If possible, look at PCs related to abuse and neglect allegations separately.
2. Does the implementation of the Bias-Free Child Removal Program have an impact on the RDI for children in other racial/ethnic groups taken into protective custody and entering substitute care?
 - If possible, look at PCs related to abuse and neglect allegations separately.
3. Does the implementation of the Bias-Free Child Removal Program have an impact on racial disparities between Black and White children at these decision-points?
4. Does the implementation of the Bias-Free Child Removal Program have an impact on child safety (i.e., maltreatment recurrence) of children with substantiated investigations?
5. Does the implementation of the Bias-Free Child Removal Program have an impact on the number of children (total and by racial/ethnic group) taken into PC in the pilot counties?
 - If possible, look at abuse and neglect allegations separately.
6. Does the implementation of the Bias-Free Child Removal Program have an impact on investigation caseloads?
7. Does the implementation of the Bias-Free Child Removal Program have an impact on length of time to complete investigation?
8. Does the implementation of the Bias-Free Child Removal Program have an impact on number and percentage of families receiving intact family services?
9. Does the implementation of the Bias-Free Child Removal Program have an impact on staff awareness of biases in child protective services?

Data Collection Methods: Data for the outcome evaluation will be collected through several different methods:

1. Administrative data will be used to examine the impact of the program on the number and percentages of children in each racial/ethnic group taken into PC and entering substitute care, investigation caseloads, length of time to investigation completion, and the number and percentage of families receiving intact family services.
2. An online survey will be administered annually that examines DCFS staff attitudes and awareness of implicit biases in CPS practice.

Research Design: Per statute, the Bias-Free Child Removal Program is being implemented in three pilot counties in Illinois (DuPage, Champaign, and Williamson). A quasi-experimental research design known as an interrupted time series (ITS) analysis will be used to evaluate the impact of the program on disproportionality and other outcomes of interest. In instances when a randomized trial is infeasible or unethical, ITS can be used to examine the impact of a policy or practice change on the rate of an outcome in a defined population of individuals. In its

simplest form, a time series (i.e., a series of repeated observations of an outcome collected over time) is divided into two segments. The first segment of the time series includes the rates of the event before the intervention or program is introduced, and the second segment includes the rates after the intervention. Segmented regression is then used to measure the changes in the level and slope of the post-intervention period compared to the pre-intervention period. Evaluations can use a single time series analysis looking only at the intervention site or can compare the changes at the intervention site to changes at another site where no intervention occurred (comparison site).¹²

There are a few requirements needed to perform an ITS analysis, and all of them will be present for the Bias-Free Child Removal Pilot Program evaluation. The first is that there needs to be a large number of “observations” of the outcome before and after the intervention is implemented. The exact number of observations is arguable; one reference suggests that there needs to be a minimum of eight observations before and after the intervention to have sufficient power to detect differences,¹³ while another suggests that a much larger number of pre-intervention observations (25-50) is needed to establish a baseline trend, especially if there is a large degree of fluctuation in the rates.¹⁴ Administrative data (SACWIS) will be used to compute the pre- and post-implementation outcome observations, which means that the number of pre-implementation observations in the time series can be sufficiently large (SACWIS data extends backward for many years). However, if the time series data are measured on a quarterly basis and at least eight post-intervention observations are needed, this means that the ITS analyses cannot be completed until two years after the program has been implemented.

The other requirement for ITS analysis is that the exact time period for the implementation of the intervention must be known so that the pre- and post-implementation segments of the time series can be defined. In addition, most interventions are installed or initially implemented over a period of weeks or months; evaluations will therefore often start the post-intervention time series once it has been fully implemented.¹⁵ The effect of an intervention on an outcome can assume a variety of forms. For example, the effect could be immediate or delayed. It is important to consider when the expected change in outcomes following implementation is likely to occur when interpreting ITS analysis results.¹⁶

ITS analysis has several strengths as a program evaluation design, especially when paired with comprehensive qualitative data regarding the implementation of the intervention. First, this approach controls for the effect of secular trends in a time series of outcome measurements. In other words, an ITS analysis takes into account the pre-intervention trends (i.e., whether the outcome was already increasing or decreasing before the intervention is introduced) when

¹² Penfold, R.B., & Zhang, F. (2013). Use of interrupted time series analysis in evaluating health care quality improvements. *Academic Pediatrics, 13*, S38-S44.

¹³ Penfold & Zhang (2013)

¹⁴ Glass, G.V. (1997). Interrupted time series quasi-experiments. In R.M. Jaeger (Ed.), *Complimentary Methods for Research in Education* (2nd ed., pp. 589-608). American Educational Research Association.

¹⁵ Penfold & Zhang (2013)

¹⁶ Glass (1997)

determining if there was an impact of the intervention. Another strength is that ITS analysis can also be used to examine unintended consequences of the intervention or policy change. However, an important limitation of ITS analysis and a threat to the validity of the results is the impact of history. ITS is only valid to the extent that the intervention or policy of interest is the only thing that changed during the implementation period. If competing interventions were also implemented during the same time, it will be difficult or impossible to attribute any observed changes in outcomes to the intervention being studied.

In summary, ITS analyses will be used to examine the impact of the Bias-Free Child Removal Program on the hypothesized outcomes. Separate ITS analyses will be conducted for each of the three pilot counties as well as for comparison counties in each region. It will be important to document any other policy or program changes that occur during the post-intervention period, such as the implementation of the SAFE model.

Appendix A – Steering Committee Members

Steering Committee Member Requirement	Name
Parent with lived experience in the child welfare system.	Anntionetta Rountree (resigned)
Former youth in care with lived experience in the child welfare system.	Prestina Singleton, UCAN (resigned)
Member of an organization or office that represents children in abuse and neglect proceedings.	Beatriz Veldez, CASA
Community-based organization that advocates for parents' rights within the child welfare system.	LeShonda Rogers, Primed for Life (resigned)
Member from a public or private university responsible for evaluating the pilot program.	Dr. Tamara Fuller, Children and Family Research Center, University of Illinois at Urbana-Champaign
Five staff members from the Department, which shall include a child protection investigator, a child protection supervisor, the Deputy Director of the Department's Division of Child Protection, the Deputy Director of the Department's Division of Race Equity Practice, and the Deputy Director of the Department's Division of Intact Services.	<p>Maria Miller, Chief Deputy of Child Protection & State Central Register (inactive)</p> <p>Dr. Aram Perry, Deputy of Child Protection</p> <p>Nikki Eldred, Child Protection Supervisor</p> <p>Serina Mathena, Child Protection Supervisor (inactive)</p> <p>Lori Welcher-Miles, Administrator formerly Deputy of Intact Services</p> <p>Christina Kelly, Acting Associate Deputy, Intact Family Services (resigned)</p> <p>Sarah Allen, Deputy, Intact Family Services (resigned)</p> <p>Dagené Brown, Director of Racial Equity Practice</p> <p>Keith Smith, Racial Equity Administrator, Northern Region (retired)</p> <p>Lindia Holmes, Racial Equity Administrator, Central Region (inactive)</p> <p>Tanya McGhee, Racial Equity Administrator, Cook County (retired)</p> <p>Tandra Clark, Racial Equity Administrator, Southern Region (retired)</p> <p>Shanquay Schaeffer, Administrative Assistant II, Office of Race Equity Practice</p> <p>Susan Barker, Deputy General Counsel</p> <p>Darnita Jackson, Assistant to the Deputy Director, Office of Legislative Affairs</p>
A licensed attorney who has practiced within the Illinois child welfare court system in a county represented in the pilot program such as, but not limited to, a public defender, an assistant state's attorney, a SB3720 Enrolled LRB102 23913 KTG 33111 b Public Act 102-1087 guardian ad litem, or a judge.	Judge Chantelle Porter, DuPage County

A member of a statewide organization that advocates on behalf of community-based services for children and families.	Dr. Jennifer Roland, ICOY Ashely Deckert, ICOY (resigned) Lyman Legters, Casey Family Services
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Appendix B – Bias-Free Child Removal Pilot Program Logic Model

Resources

Children and families eligible for the intervention will include those:

- In investigations in the three pilot counties and the child(ren) have been taken into PC.

Cases excluded:

- Cases where PC was taken by law enforcement and medical staff
- Cases involving forensic interviews
- Cases where court has made a determination of custody
- Investigations including allegations 1/51, 2/52, 4/54, 5/55, 7/57, 11/61, 12/62, 16, 18, 19, 20, 21, 22, 40/90, 78, 86

Intervention: Bias-Free Child Removal Process in three pilot counties. Per the Act, any demographic information that can identify the race of a child and family should be redacted and reviewed by an independent review team to determine if removal decision is warranted.

vs.

Comparison: Current PC process as described in Procedures 300.

External Conditions

- In Illinois, Black children are over-represented among those in investigations who are taken into protective custody when this percentage is compared to their representation in the Illinois child population (RDI = 2.3 in FY2022). Black children are also over-represented among children entering substitute care (RDI = 2.2 in FY2022).
- The RDI for Black children taken into PC in DuPage County was 6.6 in FY2022.
- The RDI for Black children taken into PC in Champaign County was 2.8 in FY2022.
- The RDI for Black children taken into PC in Williamson County was 2.1 in FY2022 and 4.9 in FY2021.

Implementation

- The steering committee will select the members of the 3 bias-free review teams and alternate members (teams consist of a CPS supervisor, an area administrator, a regional administrator). Members will be diverse in regard to geography, race, and gender.
- the Advisory Board will consist of 2 to 3 members identified from either of the eight disciplines, to oversee the fidelity of the process review team, ensuring a bias free process. Members of the AB must have some child welfare experience, however, will be trained on specific DCFS policies and procedures.
- The BFRT will receive training on how to conduct the bias free meeting, including scheduled meeting times, full discussion of questions for observation by advisory board, use of the rubric, how to document the decision, and who to communicate the decision made.

Fidelity:

- The AB is present at all BFRT meetings and is required, using a rubric, to document the process of the review. The AB will provide their individual documentation on the process. This information will serve to help make any necessary adjustments to the process, as well, assist in the evaluation of the pilot
- the review team will fully document the decision-making process using the rubric developed by the steering committee

Theory of Change

- Implicit bias is a bias that is present but not consciously held or recognized. Implicit biases related to Black families impact judgments, decisions, and behaviors, including those of child welfare workers.
- Negative implicit biases related to Black families lead to a larger number of Black families being taken into PC during an investigation and eventually entering substitute care, which leads to their over-representation in care compared to their percentage in the child population.
- Removing all information related to race, ethnicity, neighborhood, etc. from the decision-making process will eliminate the impact of implicit bias on the PC decision, which will reduce the number of Black children taken into PC and the number entering into substitute care, thereby reducing the amount of over-representation of Black children in care.

Outputs

- Number of bias-free removal meetings held per month
- % eligible cases in which a bias-free removal meeting was held
- Allegations of the investigations referred for review
- Length of time between PC and start of bias-free review meeting (measure of timeliness)
- Length of bias-free removal meeting
- Number of team member votes for removal (unanimous or not) majority vote
- Copy of the review meeting rubric
- PC decisions made
- Number and type of service referrals (IFS, others)
- IFS case open (yes/no)
- IFS length of services
- Number of review team decisions supported/confirmed by the court

Outcomes

RDI for Black children in PCs and entering care will decrease in the pilot counties

Side Effects

- Child safety (re-reports)
- RDI for children in other racial groups
- Racial disparity indices
- Number of PCs per month
- number of children entering care
- Staff awareness of implicit bias
- Staff buy-in for bias-free removal program
- staff workload/caseload
- timeliness of investigations
- Staff job satisfaction
- IFS case openings

Appendix C – Eligibility Checklist

BIAS-FREE REMOVAL PILOT PROGRAM ELIGIBILITY CHECKLIST

TO BE COMPLETED BY THE CHILD PROTECTION SUPERVISOR

1. Case Information	
Name of Child Protection Specialist (CPS):	
Name of CPS Supervisor:	
State Central Registry (SCR) number:	
Date of the Protective Custody (PC):	Number of Children Taken into Protective Custody (PC):
2. Bias-Free Case Eligibility	
Pilot County:	

Eligible Allegations (Please check all that apply)

Abuse		Neglect	
#6 – Poisons/Noxious Substances	<input type="checkbox"/>	#56 – Poisons/Noxious Substances	<input type="checkbox"/>
#9 – Bone Fractures	<input type="checkbox"/>	#59 – Bone Fractures	<input type="checkbox"/>
#10 – Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare	<input type="checkbox"/>	#60 – Substantial Risk of Physical Injury/Environment Injurious to Health and Welfare	<input type="checkbox"/>
#13 – Sprains/Dislocations	<input type="checkbox"/>	#63 – Sprains/Dislocations	<input type="checkbox"/>
#14 – Tying/Close Confinement	<input type="checkbox"/>	#65 – Substance Misuse	<input type="checkbox"/>
#15 – Substance Misuse	<input type="checkbox"/>	#67 – Mental and Emotional Impairment	<input type="checkbox"/>
#17 – Mental and Emotional Impairment	<input type="checkbox"/>	#74 – Inadequate Supervision	<input type="checkbox"/>
		#75 – Abandonment/Desertion	<input type="checkbox"/>
		#76 – Inadequate Food	<input type="checkbox"/>
		#77 – Inadequate Shelter	<input type="checkbox"/>
		#78 – Inadequate Clothing	<input type="checkbox"/>
		#79 – Medical Neglect	<input type="checkbox"/>
		#81 – Failure to Thrive (Non-Organic)	<input type="checkbox"/>
		#82 – Environmental Neglect	<input type="checkbox"/>
		#83 – Malnutrition (Non-Organic)	<input type="checkbox"/>
		#84 – Lock-out	<input type="checkbox"/>
		#85 – Medical Neglect of Disabled Infant	<input type="checkbox"/>

Ineligible Allegations (Please check all that apply)

Abuse		Neglect	
#1 – Death	<input type="checkbox"/>	#51 – Death	<input type="checkbox"/>
#2 – Head Injuries	<input type="checkbox"/>	#52 – Head Injuries	<input type="checkbox"/>
#4 – Internal Injuries	<input type="checkbox"/>	#54 – Internal Injuries	<input type="checkbox"/>
#5 – Burns	<input type="checkbox"/>	#55 – Burns	<input type="checkbox"/>
#7 – Wounds	<input type="checkbox"/>	#57 – Wounds	<input type="checkbox"/>
#11 – Cuts, Bruises, Welts, Abrasions and Oral Injuries	<input type="checkbox"/>	#61 – Cuts, Bruises, Welts, Abrasions and Oral Injuries	<input type="checkbox"/>
#12 – Human Bites	<input type="checkbox"/>	#62 – Human Bites	<input type="checkbox"/>
#16 – Torture	<input type="checkbox"/>	#86 – Neglect by Agency	<input type="checkbox"/>
#18 – Sexually Transmitted Diseases	<input type="checkbox"/>	#90 – Human Trafficking of Children	<input type="checkbox"/>
#19 – Sexual Penetration	<input type="checkbox"/>		
#20 – Sexual Exploitation	<input type="checkbox"/>		
#21 – Sexual Molestation	<input type="checkbox"/>		
#22 – Substantial Risk of Sexual Injury	<input type="checkbox"/>		
#40 – Human Trafficking of Children	<input type="checkbox"/>		

Case Exclusion (Please check all that apply)

Ineligible allegation(s)	<input type="checkbox"/>
PC'd by law enforcement and/or medical staff. Please specify Agency:	<input type="checkbox"/>
Forensic interview	<input type="checkbox"/>
Court determined custody	<input type="checkbox"/>
Photos of injuries	<input type="checkbox"/>

Bias-Free Review Eligibility (Please check one option)

Case Eligible for Review	<input type="checkbox"/>	Case Not Eligible for Review	<input type="checkbox"/>
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Supervisor's Signature

Date

TO BE COMPLETED BY THE BIAS-FREE ADMINISTRATOR

Family SCR Number:

Unique Identifier Assigned:

INSTRUCTIONS FOR THE BIAS-FREE CASE ELIGIBILITY CHECKLIST

1. Who can use this form?

Any Child Protection Supervisor who takes protective custody in the Bias-Free Removal piloted counties of DuPage, Williamson, and Champaign, should use this form.

2. What is the purpose of this form?

The purpose of the Bias-Free Case Eligibility Checklist is to determine once protective custody has been decided, if the case meet the eligibility criteria for a Bias-Free removal review.

3. When should this form be used?

The Bias-Free Case Eligibility Checklist should be used by the Supervisor for every case where protective custody is taken.

4. How to submit this form?

Complete the Bias-Free Case Eligibility Checklist and submit it to:

The Bias-Free Removal Email
DCFS.BiasFreeRemoval@illinois.gov

Appendix D – CANTS 33 Form



FORMAL REQUEST FOR STATE’S ATTORNEY TO FILE A PETITION
FOR JUVENILE COURT INTERVENTION

A separate CANTS 33 must be filled out for each minor in order to be considered by the State’s Attorney.

Minor’s Information:

Date and time Protective Custody was taken:

Name: _____

DOB: _____ Sex: Female Male

Address: _____

Custodial Parent/Guardian: _____

Parent 1:

Date and time parent notified of Protective Custody and Shelter Care Hearing:

Name: _____

DOB: _____

Address: _____

Does the Indian Child Welfare Act (ICWA) apply: Yes No

Parent 2:

Date and time parent notified of Protective Custody and Shelter Care Hearing:

Name: _____

DOB: _____

Address: _____

How paternity established: _____

Does the Indian Child Welfare Act (ICWA) apply: Yes No

Putative Parent (paternity not established):

Date and time parent notified of Protective Custody and Shelter Care Hearing:

Name: _____

DOB: _____

Address: _____

Does the Indian Child Welfare Act (ICWA) apply: Yes No

Legal Guardian other than Parent:

Name: _____

DOB: _____

Address: _____

When and how guardianship was established:



Other reports gathered including name and address of source (e.g., medical, police):

Brief summary of current involvement. Narrative should contain relevant information to support current allegations, synopsis of witness statements, photographs taken, and all other information needed for filing of petition.

Prior DCFS history of each parent. Description of DCFS history should include allegation(s), outcome(s), prior permanency and intact cases and whether services were successfully completed, whether minors have been in DCFS custody before, and open/close dates of any prior cases.

Any known criminal history of each parent:

Any known history of substance abuse:

Any known history of mental illness:

Discussion of reasonable efforts to prevent removal or why no efforts were appropriate.

Respectfully submitted by:

Child Protection Specialist

Approved by:

CPS Supervisor

Appendix E – Bias-Free Removal Pilot Program Review Team Rubric

**BIAS-FREE REMOVAL PILOT PROGRAM
REVIEW TEAM RUBRIC**

TO BE COMPLETED BY THE REVIEW TEAM MEMBER

1. Case Information	
Date of Protective Custody (PC):	Date of Review:
Number of Children Taken into Protective Custody (PC):	Family Unique Identifier:
2. Information About the Review Meeting for the Evaluation	
Reviewer Unique Identifier:	Pilot County:
Review Meeting Start Time:	Review Meeting End Time:
Name of CPS Supervisor:	
Name of Area Administrator (AA):	
Name of Regional Administrator (RA):	
Reviewer Decision Made: <input type="checkbox"/> Agree <input type="checkbox"/> Disagree	
• If disagree, please explain:	
Intact Family Services (IFS) Referral Made: <input type="checkbox"/> No <input type="checkbox"/> Yes	
Other Referrals Made: <input type="checkbox"/> No <input type="checkbox"/> Yes	
• If yes, please explain what referrals were made:	
Were you able to determine (or reasonably guess) the race/ethnicity of the family from the information provided? <input type="checkbox"/> No <input type="checkbox"/> Yes	
• If yes, please explain how:	
How many Advisory Board members were present at the meeting? <input type="checkbox"/> 0 <input type="checkbox"/> 1 <input type="checkbox"/> 2 or more	
3. Discussion Questions for the Review Team	
(The goal is for there to be a ROBUST discussion of each question and then each team member can rate their rubric form)	
Was an immediate safety threat present prior to removal? <input type="checkbox"/> No <input type="checkbox"/> Yes	
• If yes, please explain what the immediate safety threat was:	
Was a safety plan considered? <input type="checkbox"/> No <input type="checkbox"/> Yes	
• If no, please explain:	
Was there a previous history with the Department? <input type="checkbox"/> No <input type="checkbox"/> Yes	
Were reasonable efforts made to prevent removal? <input type="checkbox"/> No <input type="checkbox"/> Yes	
• If yes, please explain what efforts were made:	
• If no, please explain:	

What documentation of outreach or engagement with the non-offending parent was made?
Were in-home services considered/offered? <input type="checkbox"/> No <input type="checkbox"/> Yes Check all that apply: <input type="checkbox"/> Housing <input type="checkbox"/> Cash Assistance <input type="checkbox"/> Food, Clothing, Furniture, Other Goods <input type="checkbox"/> Child Care <input type="checkbox"/> Emergency Caretaker <input type="checkbox"/> Homemaker <input type="checkbox"/> TANF referral <ul style="list-style-type: none"> • If other, please describe: • If no services were considered/offered, please explain: • If allegations 76, 77, 78, 82 were present, were Norman funds offered? <input type="checkbox"/> No <input type="checkbox"/> Yes
What other information is important to consider such as medical or police reports?
Was the information sufficient for the Review Team to make a decision? <input type="checkbox"/> No <input type="checkbox"/> Yes <ul style="list-style-type: none"> • If no, please explain what additional information was needed:
Final Review Team Decision: <input type="checkbox"/> Agree <input type="checkbox"/> Disagree

INSTRUCTIONS FOR THE BIAS-FREE CHILD REMOVAL REVIEW TEAM RUBRIC FORM

1. Who can use this form?

Only members of the Bias-Free Child Removal Review Teams can use this form. Each Review Team shall consist of a Regional Administrator, an Area Administrator, and a CPS Supervisor

2. What is the purpose of this form?

The purpose of the Bias-Free Child Removal Review Team Rubric Form is for members of the Review Team to document the details of the meeting, the details of the team discussion, and their individual decision on whether to agree or disagree with the protective custody decision, in accordance with the Bias-Free Child Removal Act.

3. When Should This Form Be Used?

The Bias-Free Child Removal Review Team Rubric Form should be used by review team members present during the convening of a Bias-Free Review Team Meeting.

4. How to submit this form

Complete the form and submit it to:

The Bias-Free Removal Email
DCFS.BiasFreeRemoval@Illinois.gov

Appendix F – Advisory Board Monitoring Form

**BIAS-FREE REMOVAL PILOT PROGRAM
ADVISORY BOARD MONITORING FORM**
Review Team Fidelity Checklist

Advisory Board Members should be present for all case reviews to ensure that the Case Review Teams execute their activities in accordance with the Public Act 102-1087. Advisory Board Members cannot participate in the discussion and do not vote on the Protective Custody (PC) decision. This form is to be completed by the Advisory Board Member only and has the purpose of ensuring that fidelity to the intervention is high.

Name of Member: _____

Date: _____ Family Unique Identifier: _____

Pilot County: _____

Review Meeting Start Time: _____ Review Meeting End Time: _____

A. Was there information in the meeting that could lead a reasonable person to determine the race, name, gender identity, sexual orientation, ethnicity, geographic location, socioeconomic status, religious affiliation or beliefs, political affiliation, or disability status of the child and/or parent or marital status and education level of the child's parent?
 No Yes *If yes, please explain.*

B. Was there adequate discussion of the Protective Custody (PC)?
 No Yes *If no, please explain.*

C. Was the Review Team decision factually based?
 No Yes *If no, please explain.*

D. Was the information discussed in the Review Team Meeting sufficient for the Review Team to make a decision?
 No Yes *If no, please explain what additional information was needed.*

E. Was the decision unanimous from the start?
 No Yes
Or did a Review Team member change their mind?
 No Yes
What were the circumstances?

F. Did you agree with the Review Team's decision?
 No Yes *Please explain the reason why or why not.*

INSTRUCTIONS FOR THE ADVISORY BOARD MONITORING FORM

1. Who can use this form?

Only members of the Bias-Free Advisory Board can use this form. Advisory Board members as identified by the Bias-Free Child Removal Act, can be community-based partners from the fields of domestic violence, substance abuse, mental health, or housing; public or private university partners; a member of an organization that advocates on behalf of parents and families; a member of an organization that legally represents children who are involved in the foster care system, in the court process; a member of a statewide organization that advocates on behalf of community-based services for children and families; a parent with lived experience in the child welfare system; a former youth in care with lived experience in the child welfare system; and a member of an organization or office that represents children in legal abuse and neglect proceedings.

2. What is the purpose of this form?

The purpose of the Advisory Board Monitoring Form is for Advisory Board Members to document the fidelity of the Review Team's case review in accordance with the Bias-Free Child Removal Act.

3. When Should This Form Be Used?

The Advisory Board Monitoring Form should be used by Advisory Board members present during the convening of a Bias-Free Review Team Meeting.

4. How to submit this form

Complete the form and submit it to:

The Bias-Free Removal Email
DCFS.BiasFreeRemoval@Illinois.gov

Appendix G – Case Review Team Decision Memo

INSTRUCTIONS FOR THE CASE REVIEW TEAM DECISION MEMO

1. Who can use this form?

Only members of the Bias-Free Child Removal Review Teams can use this form. This form will be completed by the Regional Administrator after the review team meeting.

2. What is the purpose of this form?

The purpose of the Case Review Team Decision Memo is for members of the Review Team to communicate their team decision on whether to agree or disagree with the protective custody decision and any other case-related recommendations to the original investigator and supervisor who took protective custody.

3. When Should This Form Be Used?

The Case Review Team Decision Memo should be used by the Regional Administrator at the conclusion of a review team meeting.

4. How to submit this form

Complete the form and submit it to:

The Bias-Free Removal Email
DCFS.BiasFreeRemoval@Illinois.gov

Appendix H – Bias-Free Child Removal Pilot Program Information Sheets

Bias-Free Child Removal Pilot Program Act



Background & Purpose:

The Bias-Free Child Removal Pilot Program Act was created by SB3720 (Villa) and enacted as Public Act 102-1087 by the 102nd General Assembly. It requires the Department of Children and Family Services, herein referred to as the Department, to establish a 3-year pilot program with the primary goals of decreasing the overrepresentation of BIPOC children in out-of-home placement and promoting unbiased decision making in the child removal process. The Act is repealed on January 1, 2027.

Requirements:

The Act requires the Department to establish a steering committee responsible for the following:

- Develop the Bias-Free Pilot Program consistent with the parameters outlined in the legislation.
- Appoint senior-level internal staff to serve on the Bias-Free Case Review Teams consisting of a Child Protection Supervisor, an Area Administrator, and a Regional Administrator from areas outside of the piloted areas (requires a review team be established with alternatives to review cases for each pilot county)
 - * Develop a rubric for the Bias-Free Case Review Team to document the decision-making process and what led to the final decision.
- Appoint external stakeholders to serve on the Bias-Free Advisory Board to monitor and oversee the Bias-Free case review process to ensure it is executed with fidelity and in accordance with the provisions of the Act.
- Implement the Bias-Free intervention in a field office in DuPage County, in Champaign County and in Williamson County.
- Submit yearly evaluation report and findings to the General Assembly beginning in January 2025 and ending in January 2027 detailing the intervention's effect and impact on removal rates of BIPOC children.
**The pilot shall be considered successful and expanded statewide if the evaluation reveals that disproportionality of BIPOC children is reduced by the Act's repeal date.*

Further to achieve the goals outlined by the Act, the Bias-Free Case Review Teams are required to:

- Review removal decisions, absent specific demographic information.
- Determine whether removal of a child is necessary to avoid imminent risk to the child's safety, health and well-being.
- Focus on the evidence of safety factors, risk elements and family strengths.
- Submit their rendered decision in writing to the initial Child Protection Investigator/Supervisor. **If removal is deemed unwarranted, the Review Team shall make appropriate recommendations to ensure the safety and well-being of the child, including but not limited to, voluntary or court-ordered Intact Family Services.*

Bias-Free Intervention:

Investigations will be screened for inclusion per the list of qualifying allegations as determined by the steering committee and legislative exclusions when the decision is made to take protective custody. The Bias-Free Case Review Team will meet and render their decision prior to the case being sent to the State's Attorney Office which will occur within the first 24 hours of the mandated 48-hour window required for a Shelter Care Hearing.



Bias-Free Child Removal Pilot Program Act



Illinois Department of
DCFS
Children & Family Services



Background and purpose:

The Bias-Free Child Removal Pilot Program Act was created by SB3720 and enacted as [Public Act 102-1087](#) by the 102nd General Assembly. It requires the Illinois Department of Children and Family Services (DCFS) to establish a 3-year pilot program with the goals of decreasing the overrepresentation of BIPOC (black, indigenous and other people of color) children in out-of-home placement and promoting unbiased decision making in the child removal process.

How will the pilot program work?

Beginning January 1, 2024, the program will be piloted in DuPage, Champaign and Williamson counties. Investigations will be screened for inclusion when the decision is made to take protective custody.

If an investigation meets the criteria for inclusion in the pilot, the Bias-Free Case Review Team, consisting of a child protection supervisor, an area administrator and a regional administrator from an area outside of the piloted area, will meet within 24 hours and:

- Review the decision to remove the child, absent specific demographic information.
- Focus on the evidence of safety factors, risk elements and family strengths.
- Determine whether removal is necessary to avoid imminent risk to the child's safety, health and well-being.

The review team will submit their decision in writing to the initial child protection investigator and supervisor within 24 hours and prior to the case being sent to the States Attorney's Office. If removal is deemed unwarranted, the review team will make appropriate recommendations to ensure the safety and well-being of the child, including but not limited to voluntary or court-ordered intact family services.

External stakeholders will serve on the Bias-Free Advisory Board to monitor and oversee the case review process.

Will the pilot program be expanded statewide?

The case review team will submit yearly evaluation reports and findings to the General Assembly detailing the intervention's effect and impact on removal rates of BIPOC children. The pilot will be considered successful and expanded statewide in 2027 if the evaluation reveals that disproportionality of BIPOC children is reduced.



Learn More

DCFS.Illinois.gov • email@Illinois.gov

Appendix I – Interview and Focus Group Protocols

Questions for Child Protection Investigator and Supervisors:

Questions about the Bias-Free Removal Program:

- When did you first hear about the bias-free child removal program? What were your initial thoughts? Did you think it had the potential to be beneficial? What are your thoughts now?
- The bias-free child removal program was implemented to reduce the over-representation of Black children in the Illinois child welfare system. Do you think that disproportionality among Black children in the child welfare system is a problem in Illinois (or in your county)? Why or why not?
- What do you think are the reasons that Black children are over-represented in investigations and removals compared to their percentage in the Illinois child population?
- Do you think current removal rates are too high? Too low?
- What training, if any, have you received related to the bias-free child removal program? Was it sufficient?
- Have you received any training on racial biases? If so, what are your thoughts on this training?
- Do you think the program is working as it was intended to? Please give some examples of why or why not.
- In your opinion, what have the challenges been in implementing the bias-free child removal program? What have been the successes?
- Is there anything else you would like to share about the bias-free child removal program?

Questions about CPS practice:

- What are the most important things to take into consideration when deciding whether to take a child into PC?
- How has the implementation of the SAFE model impacted your practice?
- What do you think constitutes “reasonable efforts” to prevent child removal?
- How confident do you usually feel when taking PC that you are making the right decision?
- What about services? Are there adequate services in your area to prevent child removal? If not, what additional services are needed?
- Has the implementation of the bias-free child removal program changed anything about how you practice during an investigation? Has it had an impact on whether you take a child into PC?
- How does your current caseload impact your ability to do your job? Are there other organizational factors that impact your ability to do your job well?

Questions for the Bias-Free Child Removal Steering Committee Members

Questions about the Bias-Free Removal Program:

- When did you first hear about the bias-free child removal program? What were your initial thoughts? What are your thoughts now?
- The bias-free child removal program was implemented to reduce the over-representation of Black children in the Illinois child welfare system. Do you think that disproportionality among Black children in the child welfare system is a problem in Illinois (or in your county)? Why or why not?
- What do you think are the reasons that Black children are over-represented in investigations and removals compared to their percentage in the Illinois child population?
- Do you think current removal rates are too high? Too low?

Questions about the implementation process:

- What was the role of the steering committee in guiding implementation activities?
- How did the bias-free removal program that was implemented differ from an “ideal” program? What constraints impacted the development of the program?
- How did DCFS leadership support implementation?
- What strategies were used to solicit buy-in and/or commitment for the program from DCFS staff? From other partners essential to the success of the program? To what degree were these strategies effective? In other words, was there buy-in from DCFS staff and court personnel?
- What training was provided to staff and community partners? Was it effective?
- How was data used to improve program functioning during the initial implementation phase?
- How did the organizational culture and climate impact implementation in each pilot county?
- Were there other initiatives that impacted the implementation of the Bias-Free Child Removal program? If so, what were they and how did they impact implementation?
- Ask about communication strategies (internal and external).
- Have there been any notable differences in the implementation of the program in each of the three pilot counties?
- In your opinion, what have the challenges been in implementing the bias-free child removal program? What have been the successes?
- Do you think the program is working as it was intended to? Please give some examples of why or why not.
- Is there anything else you think is important for us to know about the implementation of the program?

Questions for the Bias Free Child Removal Review Team and Advisory Board Members

Questions about the Bias-Free Removal Program:

- When did you first hear about the bias-free child removal program? What were your initial thoughts? What are your thoughts now?
- The bias-free child removal program was implemented to reduce the over-representation of Black children in the Illinois child welfare system. Do you think that disproportionality among Black children in the child welfare system is a problem in Illinois (or in your county)? Why or why not?
- What do you think are the reasons that Black children are over-represented in investigations and removals compared to their percentage in the Illinois child population?
- Do you think current removal rates are too high? Too low?

Questions about the implementation process:

- What training, if any, have you received related to the bias-free child removal program? Was it sufficient?
- Have you received any training on racial biases? If so, what are your thoughts on this training?
- In your opinion, what have the challenges been in implementing the bias-free child removal program? What have been the successes?
- Is there anything about the local context within (this county) that has had an impact on the program that we should know about?
- Is there anything else you think is important for us to know about the implementation of the program?

Questions about the review team meeting processes:

- Can you tell us about your experiences so far in being on the bias-free removal team?
- Can you walk us through what a typical review team meeting looks like?
 - Potential follow-up questions: What are group dynamics like in the meetings? Do you have any memorable meetings you can tell us about? Is there good discussion about reasonable efforts to prevent removal?
- Do you think the review team meetings are working as intended? Why or why not?
- The redaction process is intended to make the review team meetings “race blind” (and bias-free). Would you say that the redaction process successfully eliminates the impact of race from the decision-making process?
- Do you feel like you have enough information from the review team discussion to make a decision about PC? If not, what additional information would be helpful?
- Is there anything you think needs to be changed about how the bias-free review team meetings are run?

Questions for court personnel:

Questions about the Bias-Free Removal Program:

- When did you first hear about the bias-free child removal program? What were your initial thoughts?
- The bias-free child removal program was implemented to reduce the over-representation of Black children in the Illinois child welfare system. Do you think that disproportionality among Black children in the child welfare system is a problem in Illinois (or in your county)? Why or why not?
- What do you think are the reasons that Black children are over-represented in investigations and removals compared to their percentage in the Illinois child population?
- Do you think current removal rates are too high? Too low?
- What changes, if any, do you think should be made to current CPS practices?

Questions about protective custodies:

- What factors do you think should be taken into consideration when taking a child into PC?
- What do you think constitutes “reasonable efforts” to prevent child removal?
- What about services? Are there adequate services in your area to prevent child removal? If not, what additional services are needed?
- Has the implementation of the bias-free child removal program changed your practice related to protective custodies? If so, in what ways?

Questions about the implementation of the program:

- What strategies were used to solicit buy-in and/or commitment for the program from other partners who are essential to the success of the program, such as court personnel? To what degree were these strategies effective? In other words, was there buy-in from court personnel?
- What training related to the program was provided to staff and community partners? Was it effective?
- In your opinion, what have the challenges been in implementing the bias-free child removal program? What have been the successes?
- In your opinion, what have the challenges been in implementing the bias-free child removal program? What have been the successes?
- Is there anything else you think is important for us to know about the implementation of the program?