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Bias-Free Child Removal Pilot Program 2025 Evaluation Report

Children and Family Research Center
University of Illinois at Urbana-Champaign
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Bias-Free Child Removal Pilot Program

2025 Evaluation Report

A REPORT BY THE

CHILDREN AND FAMILY RESEARCH CENTER



School of Social Work

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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 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).

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

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

of this 2025 evaluation report is to: 1) provide an updated description of the Bias-Free Child Removal Pilot Program; 2) describe the activities that were completed to implement the program (implementation evaluation); and 3) determine if the program is being implemented as intended (fidelity assessment). Data collection for the outcome evaluation will begin in 2026, after the initial implementation period has been completed.

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

2.1 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 300.² 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.

2.1.1 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).³ CFWs use the

² <https://dcfs.illinois.gov/content/dam/soi/en/web/dcfs/documents/about-us/policy-rules-and-forms/documents/procedures/procedures-300.pdf>

³ <https://dcfs.illinois.gov/content/dam/soi/en/web/dcfs/documents/about-us/policy-rules-and-forms/documents/procedures/procedures-300-appendix-b.pdf>

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.

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

2.1.2 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.

2.1.3 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.

2.2 Bias-Free Child Removal Process and Procedures

Once PC is taken during an investigation, it is only valid for 48 hours, at which time a shelter care hearing is held and the judge decides whether there is compelling evidence for the child to remain in the custody of the Department or be returned home. Therefore, all actions required to complete a Bias-Free Child Removal review meeting must occur during the 48-hour window of time after PC is taken so that they are completed *before* the shelter care hearing. Once a

shelter care hearing is held and the judge makes a decision, the PC outcome cannot be influenced by the Bias-Free Child Removal case review program.

Actions in the Bias-Free Child Removal process that must be completed during the 48-hour period include: determining if a case is eligible for a case review, completing the CANTS 33, redacting the required information from the CANTS 33, notifying case review team and advisory board members of a scheduled meeting and providing them with the redacted CANTS 33, completing the case review meeting and all required forms, and notifying all parties of the decisions. In order to streamline the case review process, eliminate inefficiencies, and reduce the burden on investigative staff, the Department automated some of these processes through the development of the Bias-Free Review Enabling Bot (BFRE Bot). The BFRE Bot supports multiple tasks throughout the case review process including gathering data and determining case eligibility, emailing notifications and reminders for open tasks, and providing documentation to the relevant people at appropriate times during the process.⁴ A high-level overview of the case flow processes, including which activities are completed by the BFRE Bot, is included in Appendix A. A more detailed description of each step of the process is included in the following sections.

2.2.1 Eligibility determinations. 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

⁴ Illinois Department of Children and Family Services. (December 2024). *Workload Management Automation Process Design Document. Office of Racial Equity Practice Bias-Free Reviews Enabling Bot.*

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

When a PC is taken in a pilot county, the BFRE Bot reads the entire investigative record that has been saved in SACWIS. To determine eligibility, the Bot uses several key factors, including the residence address (to determine if the PC occurred in a pilot county), the PC Taker (to determine if DCFS took PC), and the allegations. In addition, the Bot uses the PC Consult Date/Time to calculate when to send reminders about required actions to all involved staff. If the Bot determines that a PC is eligible for a case review, an email is sent to the assigned child protection supervisor informing them that a CANTS 33 must be uploaded as soon as possible, but no later than 12 hours after the time that PC was taken (the due date and time is noted in the email). If the Bot is not functioning for any reason, staff are instructed to complete the Bias-Free Removal Eligibility Checklist themselves and send the form to the Bias-Free Child Removal administrator.

2.2.2 Completion of the CANTS 33. 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 (see Appendix B for a copy of the CANTS 33). When completing the CANTS 33, the child protection specialist and supervisor must provide a narrative description of information to support the current PC decision, including witness statements and all other information needed to file a petition. Other narrative sections include prior DCFS involvement of each parent; known criminal history of each parent; known history of substance abuse; known history of mental illness; and a discussion of reasonable efforts to prevent removal or why no efforts were appropriate.

The steering committee decided that the investigator and supervisor would not be present at the case review meeting in order to reduce the possibility of influencing review team members’ 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. 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. Emphasizing the importance of detailed information on the CANTS 33 and other documents is 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.

For all investigations, completion of the CANTS 33 should be done within the first 12 hours after PC is taken. After the initial email that notifies the child protection supervisor and investigator that their case qualifies for a Bias-Free Child Removal case review, reminder emails are sent to them every four hours for the first 24 hours after the PC date/time. The Bias-Free Child Removal Program administrator is copied on these reminder emails and contacts the supervisor to encourage them to upload the CANTS 33 as soon as possible so the redaction and case review meeting can occur within 48 hours. If a CANTS 33 is not uploaded to the folder, a case review meeting is not held.

2.2.3 Information redaction. Once the CANTS 33 is uploaded to the folder, the BFRE Bot alerts staff in the DCFS Office of Legal Services (OLS) that documents are pending redaction. OLS redacts the required information 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. Once redacted, OLS uploads the CANTS 33 to the appropriate folder and the BFRE Bot notifies the pilot county case review team and advisory board members that a new case is ready for review.

2.2.4 Case review meeting process. All Bias-Free Child Removal case review team meetings must occur during the 48-hour window after PC has been taken and before the shelter care hearing occurs. It is therefore a requirement that all review team and advisory board members leave an hour of time open on their calendars every day from 9:00 a.m. to 10:00 a.m. in case a review team meeting needs to occur.

During the meeting, the review team discusses the circumstances surrounding the PC using the discussion questions listed on the Bias-Free Child Removal Review Team Rubric Form and each member of the team completes the Rubric Form independently of one another (please see Appendix C for a copy of the Bias-Free Child Removal Review Team Rubric). In addition to capturing information about the review team meeting (date of the PC, meeting starting and ending time), the goals of the rubric are 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 have been met. Therefore, the rubric form uses the protective custody procedures that are outlined in the Department's Procedures 300 to develop the discussion questions included on the rubric. These questions include:

- Was an immediate safety threat present prior to removal? If yes, please explain what the immediate safety threat was.
- Was a safety plan considered? If no, please explain.

- Was there a previous history with the Department?
- Were reasonable efforts made to prevent removal? If yes, please explain what efforts were made. If no, please explain.
- What documentation, outreach, or engagement with the non-offending parent were made?
- 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.
- 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. After the discussion, they vote whether to uphold or overturn the PC, with a 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 role of the advisory board is to observe the review team meeting and ensure that there is fidelity to the intervention. Advisory board members do not participate in the discussion or vote on the PC decision. At least two advisory board members should observe each review team meeting. 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. 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 D) 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 E).

3. Bias-Free Child Removal Pilot Program Evaluation

3.1 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 F). 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.⁵

3.1.1 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.”⁶ 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

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https://cfrc.illinois.edu/pubs/rp_20240926_RacialAndEthnicDisproportionalityInTheIllinoisChildWelfareSystemFY2024Report.pdf

⁶ Staats, C. (2015). State of the Science: Implicit Bias Review 2014.

<https://kirwaninstitute.osu.edu/sites/default/files/documents/2014-implicit-bias-review.pdf>

removed from their homes in protective custodies. This, in turn, will reduce the amount of over-representation of Black children removed from their homes.

3.1.2 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.

3.1.3 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 48 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.
- 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.

3.1.4 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. Another potential outcome of the implementation of the pilot program is an increase in staff awareness of implicit bias. Finally, it is possible that the implementation of the pilot program may impact job satisfaction.

3.2 Implementation Evaluation

3.2.1 Purpose, Research Questions, and Methods. The purpose of the implementation evaluation is to thoroughly describe the activities that are completed to implement the Bias-Free Child Removal Program in 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).⁷ 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.⁸ 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* and the overall functioning of the *organization*, are both necessary for effective implementation.⁹

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:

⁷ 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.

⁸ 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.

⁹ Metz et al., 2015.

1. Was the Bias-Free Child Removal Program implemented as planned in each of the pilot counties?
2. What was the role of the steering committee in guiding implementation activities?
3. How did organizational leadership support implementation?
4. 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?
5. What training was provided to staff and community partners? Was it effective?
6. How was data used to improve program functioning during the initial implementation phase?
7. How did the organizational culture and climate impact implementation in each pilot county?
8. 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?
9. What were the barriers to implementation in each county?
10. What facilitated implementation in each county?

The primary data collection method 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 6 months after the program begins and the second will be in the last year of the 3-year pilot period.

The majority of the activities to develop and implement the Bias-Free Child Removal pilot program occurred during 2024 and were described in the 2024 evaluation report. Ongoing implementation activities that occurred during 2025 included steering committee meetings, development and oversight of the BFRE Bot, recruitment of advisory board members, and training and coaching of the review team and advisory board members.

3.2.2 Steering Committee Activities. 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."¹⁰ Once established, the steering committee shall initiate implementation of the pilot program ensuring organizational readiness, adequate data collection and analysis,

¹⁰ Bias-Free Child Removal Pilot Program Act, p. 6.

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 and has continued to meet every other week during 2025. The committee is co-chaired by Dagené Brown, Director of Racial Equity Practice at DCFS and Dr. Tamara Fuller, Director of the Children and Family Research Center (CFRC). A list of the 2025 members of the steering committee and their roles is provided in Appendix G.

In addition to the steering committee, a leadership team was created in 2023 that consisted of the two steering committee co-chairs (Dagene Brown and Dr. Fuller), the Bias-Free Child Removal Program administrator, representation from Office of Legal Services, a child protection supervisor, and the Deputy Director of Child Protection. This team met every other week to discuss the status of all implementation activities and troubleshoot any problems or issues that arose. In addition, in November 2025, the leadership team initiated monthly meetings with review team members in each of the three pilot counties to discuss any issues that are impacting implementation of the Bias-Free Child Removal program.

3.2.3 Development of the Bias-Free Removal Enabling Bot (BFRE Bot). DCFS implemented an automated tool called the Bias-Free Review Enabling Bot. The Bot was developed by Deloitte's Workforce Automation Team as part of the IL Connect build to help automate case identification and document preparation. Once an eligible allegation and a protective custody entry within the pilot county are entered into SACWIS, the Bot automatically sends an email notification to the child protection investigators and supervisors. This email informs them that the case is eligible for Bias-Free Review and requests that a CANTS 33 form be completed and uploaded using a secure link. The uploaded materials are then sent for redaction before being shared with the Bias-Free Review Team. Development of the Bot began with design sessions in August through December 2024, followed by system build and testing from January to May 2025. The Bot was officially launched on June 9, 2025.

3.2.4 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 should 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 and continued until the program was implemented in May 2025. Advisory board recruitment information was shared with potential members in a variety of ways: 1) on the DNET (the DCFS intranet), 2) with legislators, 3) during presentations at conferences, 4) with birth parent advisory council, 6) with community based organizations via email blast, 7) during Child Welfare Advisory Council (CWAC) racial equity workgroup meetings, 8) with all of boards and commissions, and 9) through word of mouth. In addition, 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. Advisory board members who are “lived experts” (i.e., parents or former foster youth who have experienced CPS involvement) receive a \$25 stipend for each review team meeting they attend.

3.2.5 Case Review Team and Advisory Board Member Training. Trainings for the review team members and the advisory board were conducted in May 2025. The training was delivered through a structured teach-back model, consisting of six sequential instructional units. The training curriculum provided an overview of Procedures 300, the bias-free review process, the review team and advisory board roles and processes, court engagement, and all of the new forms. The training was virtual to ensure all participants in the review meeting are able to participate. The training took approximately four hours to complete and included a role play exercise of a mock review team meeting. The training was recorded and is available to all new child protection staff in the pilot counties, as well as staff who are temporarily assigned to work in the pilot counties.

3.3 Process Evaluation and Fidelity Assessment

3.3.1 Purpose, Research Questions, and Methods: 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. Do the advisory board members agree with the case review team decisions to uphold or overturn the PCs?

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.

3.3.2 Fidelity Assessment Results. The Bias-Free Child Removal pilot program was officially implemented in all three pilot counties on May 19, 2025, and the BFRE Bot was implemented on June 9, 2025. Data for the fidelity assessment were obtained from several sources including the DCFS Enterprise Data Warehouse (EDW); the Bias-Free Child Removal database, which includes data collected from the review team rubric, the advisory board monitoring form, and the case review team decision memo; and the evaluation team observation notes from the case review meetings. Data from May 19 through September 30, 2025, were analyzed for this report.

Eligible Protective Custodies That Received a Case Review

The DCFS EDW was used to identify the number of eligible PCs in each of the three pilot counties by looking at the PC date, the person address (to determine the county of residence), the PC Taker (only PCs taken by DCFS were eligible), and the allegations. Table 3 shows the number of ineligible and eligible PCs that were taken in each county, as well as the number of case reviews that were completed between May 19 and September 30, 2025. The percentage of eligible cases that were reviewed varied in the three pilot counties and was 21.7% in Champaign County, 30.0% in DuPage County, and 55.6% in Williamson County.

Table 3. Number and Percentage of Eligible Cases Reviewed

Pilot County	Ineligible	Eligible	Cases Reviewed	% of Eligible Cases Reviewed
Champaign	12	23	5	21.7%
DuPage	16	20	6	30.0%
Williamson	22	18	10	55.6%
Total	50	61	21	34.4%

Although these dates fell outside of the window used for analysis in this report, it should also be noted that there was an issue in the SACWIS production environment that prevented new protective custody cases from being processed by the BFRE Bot between Thursday, October 23 at 8:53 AM and Thursday, November 13 at 3:45 PM.

Fidelity Measures for Reviewed Cases

Of the cases that were reviewed in each pilot county, Table 4 shows the number and percentage that were reviewed within 48 hours of the PC, had all three members of the review team present, had at least two members of the advisory board present, and had all the information redacted so that no member of the review team or advisory board could determine the race/ethnicity of any of the family members. Overall, 81% of the case review meetings were held within 48 hours of the PC. The three required review team members were there in 100% of the case reviews (although there was some missing information in the database for one meeting). However, advisory board members were often absent from the meetings: only two meetings (9.5%) had the two required advisory board members present and another eight meetings (38.1%) had one advisory board member present. Although there was one case in which the child names were not all redacted from the CANTS 33 narrative, the unredacted information did not reveal the race or ethnicity of the family. In other words, child and family race and ethnicity were successfully blinded from the case review team members in all of the cases. The average length of the case review meetings varied by county and was 46.6 minutes in Champaign County, 30.7 minutes in DuPage County, and 27.6 minutes in Williamson County. The shortest meeting was 6 minutes (Williamson) and the longest was 89 minutes (DuPage).

Table 4. Case Review Meeting Fidelity Measures

Pilot County	Reviewed Within 48 Hours		Three Review Team Members		Two Advisory Board Members		Information Redacted	
	N	%	N	%	N	%	N	%
Champaign (n = 5)	3	60%	5	100%	0	0%	5	100%
DuPage (n = 6)	4	66.7%	6	100%	2	33.3%	6	100%
Williamson (n = 10)	10	100%	10	100%	0	0%	9	90%
Total (n = 21)	17	81.0%	21	100%	2	9.5%	20	95.2%

Case Review Team Decisions to Uphold or Overturn the Protective Custodies

Only one of the 21 PCs that were reviewed was overturned by a case review team (i.e., the review team disagreed with the PC decision); this occurred for a PC that was taken in Williamson County. This case was rejected by the State’s Attorney, which means that they refused to file a petition.

The evaluation team was able to observe the majority of the case review meetings that occurred between May 19 and September 30, 2025. During those observations, the team members took informal notes about all aspects of the meeting, including the number of people present, the quality of the discussion about each of the questions on the rubric, and any technical issues that came up related to the review. One issue that was discussed in a majority of the case review meetings was the amount and quality of the information that was included in the CANTS 33 form. In many instances, the review team members felt that the amount of information included in the CANTS 33 was not adequate for them to make an informed decision about whether the PC should be upheld or not. Since the CANTS 33 is the only information about the case that the review team receives, if it was inadequate or incomplete, the review teams always decided to err on the side of caution and uphold the PC. Thus, it seems unlikely that the number and percentage of PCs that are overturned by the review teams will increase unless the quality of the information in the CANTS 33 improves. Additional qualitative data on the review team decision-making process will be gathered in 2026 during interviews and focus groups with the team members.

3.4 Outcome Evaluation

As shown in the logic model (see Appendix F), it is anticipated that the successful implementation of the Bias-Free Child Removal pilot program will reduce the amount of over-representation of Black children in protective custodies and substitute care entries in the pilot counties (the primary outcome), as measured by the Racial Disproportionality Index (RDI). In addition, it may impact other outcomes as well, such as the number of PCs taken, the number of children entering care, the RDI of children in other racial and ethnic groups, the number and percentage of children in investigations that experience maltreatment recurrence, and the number of intact family cases opened following an investigation. It may also impact organizational variables such as employees’ awareness of implicit bias and job satisfaction.

For the evaluation, the child- and case-level outcomes will be measured using administrative data that are available in the DCFS Enterprise Data Warehouse. However, DCFS does not routinely collect data related to employee job satisfaction or implicit bias awareness. Therefore, the evaluation team developed a survey to measure these variables on an annual basis. This section describes the development of the Child Welfare Services Implicit Bias Survey, the methods used to collect pre-implementation baseline data, and the results of the baseline survey.

The evaluation team conducted an extensive search of the child welfare academic literature as well as existing child welfare policy and practice organizations such as the Annie E. Casey Foundation and the Child Welfare Information Gateway to identify existing surveys that could be used in the pilot program evaluation. Although several surveys related to cultural competency were identified, the pilot program was not designed to have an impact on this construct, and therefore these surveys were not suitable for the current evaluation needs.

Widening the search to related fields identified a measure of bias that had been developed for use in maternal health care. The Bias in Maternal Health Care Scale¹¹ has been validated and proven reliable, and analysis of the scale's content and focus revealed that it could be easily adapted for use in the child welfare field by replacing terms such as "patient care" with "child welfare services." The resulting Child Welfare Services Implicit Bias Survey consists of 23 items with three subscales that measure:

- Bias awareness, which explores respondents' recognition of how biases affect behaviors, decisions, and disparities in services.
- Bias mitigation self-efficacy, which assesses respondents' confidence in identifying and addressing biases.
- Bias mitigation practices, which measures behaviors aimed at reducing the impact of bias on families and decision-making processes.

Responses were scored on a five-point Likert scale: strongly disagree (1), disagree (2), neither agree nor disagree (3), agree (4), and strongly agree (5). In addition to the questions related to implicit bias, two questions were added that assess overall job satisfaction and workload satisfaction.

The survey was administered to all DCFS child protection staff, including investigators, supervisors, and administrators, during March 2025 to assess pre-implementation baseline levels of staff bias awareness, bias mitigation self-efficacy, and bias mitigation practice before the initial implementation of the pilot program. Child protection staff in all counties were invited to take the survey, not just those in the pilot counties. A total of 277 individuals took the survey; of these, 12% identified themselves as administrators, 29% were supervisors, 56% were investigators, and 3% selected "other role."

Table 6 shows the mean scores for each item and the three subscales for the pilot counties, non-pilot counties, and all counties. In addition, the last column shows if there was a statistical difference between the mean score for the pilot counties and non-pilot counties. Overall, the mean subscale scores were high across all three subscales. The Bias Awareness subscale had a lower mean score (M = 3.77) compared to the Bias Mitigation Self-Efficacy (M = 4.21) and Bias Mitigation Practice (M = 4.02) subscales. The item "My co-workers should make an effort to prevent their biases from affecting child welfare services" received the highest mean score (M = 4.33), while the item "I could unintentionally behave in biased ways towards families based on

¹¹ Bower, K. M., Kramer, B., Warren, N., Ahmed, S., Callaghan-Koru, J., Stierman, E., ... & Creanga, A. A. (2023). Development of an instrument to measure awareness and mitigation of bias in maternal healthcare. *American Journal of Obstetrics & Gynecology MFM*, 5(4), 100872. <https://doi.org/10.1016/j.ajogmf.2023.100872>

characteristics like race, ethnicity, or gender” received the lowest mean score (M = 3.03). No statistically significant differences were found between pilot and non-pilot counties on any item or subscale at this baseline timepoint. Internal consistencies were good across all three subscales (Cronbach’s $\alpha \geq 0.80$).

Table 6. Baseline Mean Response Scores for Pilot, Non-Pilot, and All Counties

	All Counties (N=275-277)	Pilot Counties (n=38)	Non-Pilot Counties (n=217-218)	p-value for t-test
	Mean (SD)	Mean (SD)	Mean (SD)	Mean (SD)
Bias Awareness Subscale (Cronbach’s $\alpha = 0.80$)				
1. Biases can affect our behaviors towards other people based on characteristics like race, ethnicity, or gender.	4.10 (1.12)	4.18 (1.23)	4.11 (1.09)	0.722
2. Biases contribute to racial/ethnic disparities in child welfare services.	3.91 (1.05)	3.87 (1.23)	3.93 (1.00)	0.732
3. I have biases.	3.35 (0.94)	3.34 (1.07)	3.35 (0.94)	0.983
4. I could unintentionally behave in biased ways towards families based on characteristics like race, ethnicity, or gender.	3.03 (1.16)	3.08 (1.12)	3.01 (1.18)	0.752
5. The biases of my co-workers could affect child welfare services.	3.96 (0.90)	3.95 (1.04)	3.98 (0.86)	0.826
6. My biases could affect the child welfare services I provide to families.	3.09 (1.22)	3.24 (1.34)	3.07 (1.21)	0.450
7. My co-workers should make an effort to prevent their biases from affecting child welfare services.	4.33 (0.77)	4.42 (0.83)	4.34 (0.76)	0.532
8. I should make an effort to prevent my biases from affecting child welfare services.	4.32 (0.90)	4.32 (1.04)	4.34 (0.89)	0.860
9. I am concerned about the effects of bias on child welfare services.	3.82 (0.96)	4.03 (1.00)	3.81 (0.94)	0.199
Subscale Total	3.77 (0.63)	3.82 (0.67)	3.77 (0.62)	0.642
Bias Mitigation Self-Efficacy Subscale (Cronbach’s $\alpha = 0.87$)				
1. I am confident that I can identify my own biases while serving families.	4.28 (0.62)	4.42 (0.55)	4.26 (0.64)	0.140

2. I am confident that I can change my behavior to limit the impact of biases on families.	4.29 (0.66)	4.37 (0.54)	4.28 (0.68)	0.446
3. I am confident that I can use strategies to recognize thoughts that may have been influencing my biases.	4.28 (0.63)	4.39 (0.59)	4.29 (0.61)	0.308
4. I am confident that I can use strategies to reduce my bias in my communication with families.	4.28 (0.64)	4.37 (0.54)	4.28 (0.65)	0.429
5. I am confident that I can speak with my coworkers about bias in our team.	3.91 (0.95)	3.82 (1.09)	3.93 (0.93)	0.495
6. I am confident that I can challenge a case-related decision if I think it was influenced by bias.	4.13 (0.77)	4.13 (0.81)	4.13 (0.78)	0.992
7. I am confident that I can intervene if I think a family is being treated in a biased way.	4.28 (0.72)	4.37 (0.54)	4.28 (0.76)	0.497
Subscale Total	4.21 (0.54)	4.27 (0.49)	4.21 (0.55)	0.523
Bias Mitigation Practice Subscale (Cronbach's $\alpha = 0.84$)				
1. I identify my own biases while serving families.	4.10 (0.69)	4.21 (0.70)	4.10 (0.69)	0.351
2. I can change my behavior to limit the impact of my biases on families.	4.25 (0.65)	4.32 (0.62)	4.26 (0.66)	0.608
3. I use strategies to recognize thoughts that may have been influenced by my biases.	4.11 (0.68)	4.11 (0.61)	4.12 (0.68)	0.875
4. I use strategies to reduce my bias in communication with families.	4.13 (0.67)	4.21 (0.58)	4.13 (0.67)	0.503
5. I speak with my coworkers about bias in our team.	3.42 (0.99)	3.53 (1.13)	3.43 (0.96)	0.584
6. I challenge a case-related decision if I think it was influenced by bias.	3.99 (0.73)	4.08 (0.54)	3.99 (0.75)	0.489
7. I intervene if I think a family is being treated in a biased way.	4.15 (0.70)	4.21 (0.53)	4.16 (0.73)	0.687
Subscale Total	4.02 (0.53)	4.09 (0.44)	4.03 (0.54)	0.474

Notes. SD = standard deviation. Sample sizes vary slightly across items due to missing responses. The mean score was calculated by coding responses on a 5-point scale, where 1 = Strongly Disagree, 2 = Disagree, 3 = Neither Agree nor Disagree, 4 = Agree, 5 = Strongly Agree.

Table 7 presents the mean response scores for the three pilot counties. The mean scores for Bias Awareness were the lowest among the three subscales, ranging from 3.37 in DuPage County to 4.08 in Champaign County. The mean scores for both Bias Mitigation Self-Efficacy and Bias Mitigation Practice subscales were over 4, indicating the average response across all items was at least “agree.” Staff in DuPage County generally reported lower scores on recognizing bias and its potential effects but higher scores on bias mitigation self-efficacy and practice than staff in Champaign and Williamson Counties.

Table 7. Baseline Mean Response Scores by Pilot Counties

	Champaign (n=19)	DuPage (n=7)	Williamson (n=12)
	Mean (SD)	Mean (SD)	Mean (SD)
Bias Awareness subscale			
1. Biases can affect our behaviors towards other people based on characteristics like race, ethnicity, or gender.	4.47 (0.96)	3.43 (1.72)	4.17 (1.19)
2. Biases contribute to racial/ethnic disparities in child welfare services.	4.16 (0.96)	3.29 (1.70)	3.75 (1.29)
3. I have biases.	3.68 (0.95)	2.43 (1.40)	3.33 (0.78)
4. I could unintentionally behave in biased ways towards families based on characteristics like race, ethnicity, or gender.	3.42 (1.02)	2.29 (1.11)	3.00 (1.13)
5. The biases of my co-workers could affect child welfare services.	3.89 (1.15)	4.14 (1.21)	3.92 (0.79)
6. My biases could affect the child welfare services I provide to families.	3.68 (1.20)	2.57 (1.72)	2.91 (1.16)
7. My co-workers should make an effort to prevent their biases from affecting child welfare services.	4.53 (0.77)	4.29 (1.11)	4.33 (0.78)
8. I should make an effort to prevent my biases from affecting child welfare services.	4.68 (0.48)	3.57 (1.51)	4.17 (1.19)
9. I am concerned about the effects of bias on child welfare services.	4.21 (0.92)	4.29 (0.95)	3.58 (1.08)
Subscale Total	4.08 (0.57)	3.37 (0.77)	3.69 (0.61)
Bias Mitigation Self-Efficacy subscale			
1. I am confident that I can identify my own biases while serving families.	4.42 (0.61)	4.43 (0.53)	4.42 (0.51)
2. I am confident that I can change my behavior to limit the impact of biases on families.	4.32 (0.58)	4.57 (0.53)	4.33 (0.49)
3. I am confident that I can use strategies to recognize thoughts that may have been influencing my biases.	4.37 (0.68)	4.43 (0.53)	4.42 (0.51)

4. I am confident that I can use strategies to reduce my bias in my communication with families.	4.32 (0.58)	4.43 (0.53)	4.42 (0.51)
5. I am confident that I can speak with my coworkers about bias in our team.	3.79 (1.18)	4.00 (1.15)	3.75 (0.97)
6. I am confident that I can challenge a case-related decision if I think it was influenced by bias.	4.00 (0.88)	4.43 (0.53)	4.17 (0.83)
7. I am confident that I can intervene if I think a family is being treated in a biased way.	4.32 (0.48)	4.57 (0.53)	4.33 (0.65)
Subscale Total	4.22 (0.53)	4.41 (0.57)	4.26 (0.38)
Bias Mitigation Practice subscale			
1. I identify my own biases while serving families.	4.11 (0.66)	4.43 (0.79)	4.25 (0.75)
2. I can change my behavior to limit the impact of my biases on families.	4.26 (0.56)	4.57 (0.53)	4.25 (0.75)
3. I use strategies to recognize thoughts that may have been influenced by my biases.	4.05 (0.62)	4.14 (0.69)	4.17 (0.58)
4. I use strategies to reduce my bias in communication with families.	4.26 (0.56)	4.29 (0.49)	4.08 (0.67)
5. I speak with my coworkers about bias in our team.	3.53 (1.31)	3.29 (1.11)	3.67 (0.89)
6. I challenge a case-related decision if I think it was influenced by bias.	4.11 (0.46)	4.14 (0.69)	4.00 (0.60)
7. I intervene if I think a family is being treated in a biased way.	4.11 (0.46)	4.43 (0.53)	4.25 (0.62)
Subscale Total	4.06 (0.46)	4.18 (0.43)	4.10 (0.44)

Note. SD = standard deviation. The mean score was calculated by coding responses on a 5-point scale, where 1 = Strongly Disagree, 2 = Disagree, 3 = Neither Agree nor Disagree, 4 = Agree, 5 = Strongly Agree.

4. Summary and Conclusions

The Bias-Free Child Removal pilot program was implemented in the three pilot counties on May 19, 2025. The 2025 evaluation report examines the pre-implementation activities that occurred leading up to the start date as well as the fidelity of the program during the first 4.5 months following implementation. Outcome data were not collected for the cases that were reviewed during this period, as continuous quality improvements were being made to reach fidelity.

The results of the fidelity assessment revealed that several components of the program were being implemented with high levels of fidelity, while others were not and need additional practice supports to achieve high fidelity.

1. **Case Reviews for Eligible PCs:** This is one area where fidelity is low. For the three pilot counties, 21 out of 61 (34.4%) of the eligible PCs received a bias-free child removal case review. The percentages varied substantially by county; 21.7% of eligible cases were reviewed in Champaign County, 30.0% in DuPage County, and 55.6% in Williamson County. In the initial program plan, eligibility determinations were going to be made by the investigation supervisor through the completion of an eligibility determination checklist form. In order to reduce the burden on staff, the eligibility determination process was automated and as of June 9, 2025, is completed by the BFRE Bot. Part of the reason that the percentage of eligible cases that received reviews is so low is that the Bot was not operational during the first three weeks of the program. Although supervisors should have been completing the eligibility determination checklist, only one case review occurred during this time period for the six PCs that were eligible for review. However, there were several eligible PCs that did not receive a case review during the period after the Bot was enabled, which means that there are additional factors that are contributing to the low fidelity in this area. One factor may be that the CANTS 33 forms might be uploaded late or may be missing, and a review team meeting cannot be completed without the CANTS 33 form. A more thorough probe into the eligible cases that did not receive a review is warranted.
2. **Case Reviews Occur Within 48 Hours:** Overall, fidelity in this area was high, with 17 of 21 reviews (81%) occurring within 48 hours. However, this varied by county: 60% were reviewed within 48 hours in Champaign County, 66.7% in DuPage County, and 100% in Williamson County. Fidelity could be improved in Champaign and DuPage Counties.
3. **Required Members Present at Meetings:** As specified in the Act, there should be three case review team members present at each meeting: an investigation supervisor, an area administrator (AA), and a regional administrator (RA). There was perfect fidelity in this area; all three individuals were present in 100% of the review team meetings in each pilot county. The Act also specifies that each meeting should be attended by at least two members of the advisory board. Fidelity was very low in this area; only 2 of the 21 reviewed cases had two advisory board members present. Another eight meetings

had one advisory board member present, meaning that the majority of the meetings (52.3%) did not have an advisory board member present. Interview and focus group data collection with the advisory board members will occur in 2026 and may shed additional light on why most advisory board members are not attending the case review meetings.

4. **Information Redaction and “Blinding”:** The primary purpose of the bias-free child removal case review is to remove the impact of implicit bias on the PC decision-making process by removing all information about race, 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 neighborhood from the case file information. Therefore, prior to the CANTS 33 form being sent to the case review team and advisory board members, this information is redacted by staff from the DCFS Office of Legal Services. Results of the fidelity assessment show that this information was completely redacted in almost all of the reviewed cases. There was one case where the names of the two family members were inadvertently left in the CANTS 33; however, this information did not reveal the race or ethnicity of the individuals.

5. **Case Review Meeting Discussions:** The case review team members discuss the details of the PC using the discussion questions that are listed in the Bias-Free Child Removal Team Rubric Form:
 - a. Was an immediate safety threat present prior to removal? If yes, please explain what the immediate safety threat was.
 - b. Was a safety plan considered? If no, please explain.
 - c. Was there a previous history with the Department?
 - d. Were reasonable efforts made to prevent removal? If yes, please explain what efforts were made. If no, please explain.
 - e. What documentation, outreach, or engagement with the non-offending parent were made?
 - f. 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.
 - g. If allegations 76, 77, 78, 82 were present, were Norman funds offered?

The evaluation team observed a large majority of the case review team meetings and took informal notes on the content and process of the discussions that occurred. Both the quality and quantity of the discussions that occurred were largely dependent on the quality and quantity of information that was contained in the CANTS 33 form. In many instances, the case review team members felt that the information needed to have a discussion or make a decision was lacking detail or missing altogether, which led to short meetings and minimal review of the discussion questions. However, even in cases where the CANTS 33 forms were completed more thoroughly, the review team members did not always discuss each of the rubric questions thoroughly, especially

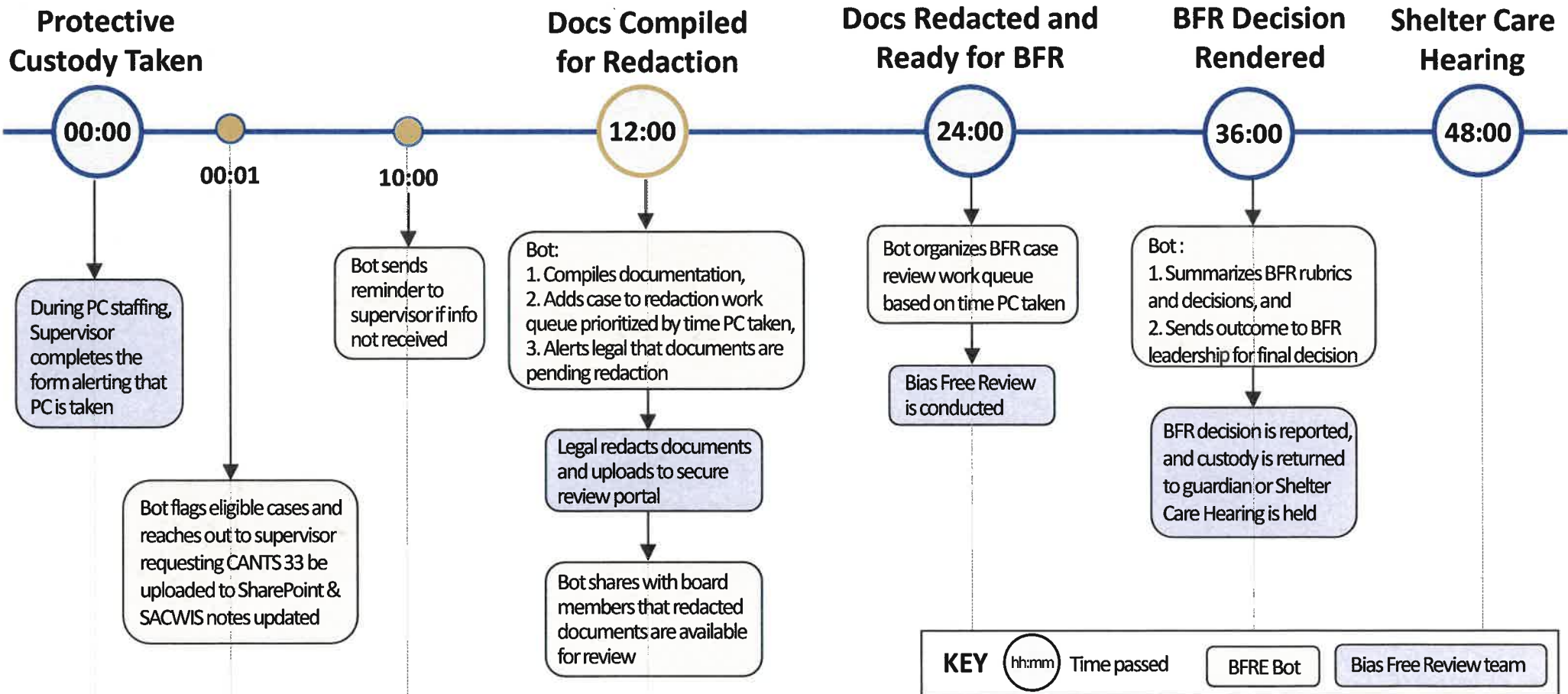
when they immediately decided to “agree” with the PC decision at the start of the meeting.

The quality of the information in the CANTS 33 forms was also a contributing factor to the large percentage of cases in which the PC decision was upheld (95.2%) by the case review team. When there was scant information in the CANTS 33 form, the review teams felt that they did not have enough to make an informed decision that might place the safety of the child in jeopardy, so they erred on the side of caution and upheld the PC. Therefore, in order to improve the quality of the discussions that occur during the meetings, additional emphasis must be placed on training and coaching the investigation staff to complete the CANTS 33 as thoroughly as possible. This may also lead to a larger number of PC decisions being overturned by the review teams. Without sufficient information available to the review teams, it is unlikely that enough PCs will be overturned for the bias-free child removal program to have an impact on removals.

Appendix A – Bias-Free Removal Enabling Bot Processes

High-Level Automation Process Flow

The process flow outlines Bias Free Review (BFR) processes in relation to the 48-hour timeline to the Shelter Care Hearing.



Appendix B – 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 C – 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 D – 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 E – 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 F – 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 G – 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 Director of Child Protection & State Central Register (resigned)</p> <p>Dr. Aram Perry, Deputy Director of Child Protection</p> <p>Nikki Eldred, Child Protection Supervisor</p> <p>Serina Mathena, Child Protection Supervisor (resigned)</p> <p>Lori Welcher-Miles, Administrator formerly Deputy of Intact Services</p> <p>Christina Kelly, Acting Associate Deputy Director of Intact Family Services (resigned)</p> <p>Sarah Allen, Deputy of Intact Family Services</p> <p>Dagené Brown, Director of Racial Equity Practice</p> <p>Keith Smith, Racial Equity Administrator, Northern Region</p> <p>Lindia Holmes, Racial Equity Administrator, Central Region (resigned)</p> <p>Tanya McGhee, Racial Equity Administrator, Cook County (resigned)</p> <p>Tandra Clark, Racial Equity Administrator, Southern Region (resigned)</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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