

**Philadelphia Department of Behavioral Health Intellectual disAbility Services
Infant Toddler Early Intervention**

Child Protective Services – Mandated Reporting of Child Abuse and Neglect and Reportable Incidents

Policy

This policy specifies the guidelines that all Early Interventionists and Service Coordinators and the agencies that are their employers, must comply with the Child Protective Services Law and the Commonwealth's policy on Reportable Incidents in Early Intervention.

All agencies will review and comply with the Child Protective Services Law and its requirements for the mandated reporting of child abuse and neglect. Information about the Child Protective Services Law and requirements can be found at

<https://www.legis.state.pa.us/CFDOCS/LEGIS/LI/consCheck.cfm?txtType=HTM&ttl=23&div=00.&chpt=063.&CFID=224154444&CFTOKEN=11851291>

All required clearances are obtained and maintained within timelines. Training requirements on mandated reporting and reportable incidents are implemented and maintained according to PA law and policy.

Procedures

Responsibilities of Mandated Reporters under the Child Protective Services Law

All Early Interventionists and Service Coordinators are mandated reporters and must be knowledgeable about the responsibilities of a mandated reporter

<https://www.compass.state.pa.us/CWIS/Public/ReferralsLearnMore>

To fulfill the legal mandate of the Child Protective Services Law, the Mandated Reporter must immediately make a report when she or he has reasonable cause to suspect that a child is being abused or neglected. This report can be done one of two ways.

1. **Call ChildLine at 1-800-932-0313.** ChildLine is available 24 hours/ 7 days a week. As a mandated reporter, you must provide your name and contact information when making the call. After making the call, mandated reporters must follow up with a written report completed on the CY-47 form http://services.dpw.state.pa.us/oimpolicymanuals/cash/CY_47.pdf within 48 hours of making the oral report. The completed CY-47 form is to be sent to Philadelphia Department of Human Services either by fax: 215 683 5997 or by mail:
DHS
1515 Arch Street
1 Parkway Building
Floor #8
Philadelphia, PA 19102
2. **Make an electronic report to ChildLine** at <https://www.compass.state.pa.us/cwis/public/home>
You must create an individual account to report child abuse.

After making the report to ChildLine, the mandated reporter must tell the person in charge of the Early Intervention agency. That person then is responsible to facilitate the agency's cooperation with any investigation and assist the mandated reporter with any concerns she or he may have.

Development and Review of Agency's Reportable Incident Policy

Early Intervention agencies (with more than one staff person) will develop a Reportable Incident Policy and procedures for their agency. The agency policy must specifically address the requirements of the Commonwealth's policy on Reportable Incidents involving children receiving Early Intervention and the Child Protective Services Law. Each agency policy is to be forwarded to the agency's County Program Analyst for review. Once approved, Early Intervention providers are to train their staff and contractors to implement the policy. As part of the County's annual monitoring of providers, Program Analysts will review the agency's training and implementation of Reportable Incident policy.

Resource Fund agencies will also be required to develop a Reportable Incident Policy, which will be reviewed annually as part of annual provider monitoring. If a Resource Fund agency consists of one Early Interventionist and that person is the subject of an investigation, that Early Interventionist will not be permitted to work with the infant or toddler that s/he is alleged to have abused (or any child, when the allegation warrants such action) pending the outcome of the investigation. The assigned Program Analyst will complete the investigation as specified in Office of Child Development and Early Learning (OCDEL) Announcement: EI-08 #2.

Required Elements of Provider's Reportable Incident Policy

Each provider agency policy (see note below) must address the following areas:

1. Ensure the safety of EI children during the investigation. Specifically, the alleged perpetrator will not be permitted to work with the infant or toddler that s/he alleged to have abused (or any child, when the allegation warrants such action) pending the outcome of the investigation.
2. Mandated reporters must make an immediate and direct report of suspected child abuse to ChildLine as specified above.
3. Disciplinary action or removal of the Early Interventionist if abuse is founded.
4. Identifies how the investigation will be conducted.
4. Specifies full cooperation and coordination with the ChildLine investigation.
5. Identify the steps for staff and contractors for reporting, documenting suspected incidents.
6. Include timelines (specified below) for all steps and procedures
7. The process and directions for the completion and distribution of the required investigation report.
8. References and has as an attachment the Commonwealth's (OCDEL) Announcement: EI-08 #2.
9. Identify who the contact person (or position) is for staff to report incidents, and who [staff or position(s)] will investigate reports of suspected child abuse that involve an Early Interventionist in your employ.
10. Outlines the dates and time frames for the distribution and training of all staff in this policy.

Reportable Incident Reporting Procedures and Timelines

- Incident Report investigations shall be initiated by the EI agency (or Philadelphia ITEI when an incident involves a Resource Fund agency with a single Early Interventionists) within 24 hours of receipt of the EI Reportable Incident form. This form is available at https://www.education.pa.gov/Early%20Learning/Early%20Intervention/Pages/Early-Intervention-Announcements.aspx#.VeHdG_IVhBca
- Incident Report investigations shall be concluded within 10 business days of initiation of the investigation, unless mitigating conditions exist, such as a police investigation or Philadelphia Department of Human Services (DHS) investigation that prevent the completion of the incident investigation within this time frame. Philadelphia ITEI shall contact OCDEL to request an extension of the time frames for conclusion of an investigation.
- Agencies shall forward the investigation report to the Philadelphia ITEI Program Manager and assigned Program Analyst, by secure email within 5 business days of completion of the report.

- The ITEI Program Manager and assigned Program Analyst will review the agency's investigation report. The Program Manager (or her designee) will approve the report or request additional information within 5 business days of receipt of the agency's report.
- ITEI will forward a copy of the incident report and agency's investigation report to OCDEL within 5 business days of completion of the report.

Investigation Report

An investigation report shall include:

- a copy of the EI Reportable Incident form
https://www.education.pa.gov/Early%20Learning/Early%20Intervention/Pages/Early-Intervention-Announcements.aspx#.VeHdG_IVhBca
- the date on which the investigation began
- evidence:
 - list of all persons interviewed, including date and time
 - list of statements taken from persons interviewed
 - analysis
 - conclusion
 - recommendations
- the status of the alleged perpetrator
- A description of the steps taken by the agency or ITEI in response to the incident as well as the conclusion reached as a result of the investigation. See #1 above re: ensure the safety of EI children during an investigation.
- The date the investigation was concluded.

Contact Information

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