

ALAMEDA COUNTY FOSTER CARE SYSTEM: SOME POSITIVE TRENDS, BUT TOO MANY CHILDREN SENT OUT OF THE COUNTY

EXECUTIVE SUMMARY

The Grand Jury received a complaint calling for an investigation of the 2015 death of an Alameda County child while she was living in an out-of-county foster home. Reportedly, the child died just days after her third birthday after she twice ingested methamphetamines that were present in the foster home. Because of pending litigation related to that tragedy, the Grand Jury was precluded from looking into the circumstances of the child's death and how, if at all, the foster care system failed her. Unable to pursue that specific and eminently worthy subject of investigation, the Grand Jury decided instead to examine more generally how well Alameda County's child welfare agency is taking care of foster children who face troubled home environments and who may need to live apart from their immediate families.

We found that Alameda County has made substantial progress in reducing the number of children living in traditional foster care settings. Alameda also has done very well, relative to many other California counties, on critical performance measures concerning incidents of abuse and neglect of foster children. These results reflect positively on the dedicated efforts of the child welfare workers in the Alameda County Social Services Agency's Department of Children and Family Services (DCFS).¹ However, we also found that there is more that should be done to move closer to the goal of placing all foster children in safe and caring homes, preferably right here in Alameda County. Specifically, the Grand Jury identified a number of significant concerns that require the county's attention:

- An insufficient supply of approved foster homes in Alameda County, a problem that has not been effectively addressed by recruitment and retention efforts to date,
- An excessive number of out-of-county foster care placements,
- An overreliance on Foster Family Agencies (FFAs) to arrange and supervise foster care placements,
- Excessive child welfare social worker caseloads, and
- Undue DCFS delay in implementing the state-mandated Child and Family Team (CFT) approach to making and overseeing foster care placements.

¹ For ease of reference, a list of the acronyms used herein appears at the end of this report.

BACKGROUND

Foster Care in California – State and County Roles

The basic structure of the foster care system in California is that the state establishes a common platform of regulations that all 58 counties must implement and administer. The responsible agency of state government is the California Department of Social Services (CDSS). The responsible agency of Alameda County government is the Social Services Agency (SSA). Within SSA, which is one of the largest county agencies in terms of both personnel and budget, primary responsibility for child welfare matters, including foster care, falls to the Department of Children and Family Services (DCFS).

Trend Away from Traditional Foster Care Placements

The stated mission of DCFS is: “[t]o ensure that all children receive the support and security that family, an extended family, or an alternative family can provide.” Embedded in that mission statement is a principle widely accepted by child welfare experts: that it is most often in a child’s best long-term interests if he or she can live with his or her family. That is why DCFS programs, like those of many child welfare agencies across California and the nation, have evolved to stress

The emphasis on family preservation and reunification in recent years has produced desirable results. Across California, total foster placements declined more than 48% from 2000 to 2017. The decline in the number of children in all types of foster placements has been even steeper in Alameda County: from approximately 3,500 in 2010 to 1,222 as of year-end 2018, a 65% decrease.

family preservation or reunification as the best solutions for most difficult home situations. When preservation of, or reunification with, immediate family is not feasible, placing a child with an extended family member or a non-relative with whom the child has an existing, close relationship (“kin caregiving” or “kincare”) is the next best outcome. Placement in foster homes (which shall be referred to here as “traditional foster care” to distinguish such placements from kin caregiving placements) is the chosen outcome only when, and

for so long as, the preferred options of family preservation/reunification and kin care are not available. That order of preference does not stem from a view that the traditional foster parent community is in any way deficient. To the contrary, experts in the field told the Grand Jury that the vast majority of foster parents perform a genuine community service by providing safe, loving homes for the children entrusted to their care. Nevertheless, the prevailing expert view is that children usually fare best when they live with immediate or extended family.

The emphasis on family preservation and reunification in recent years has produced desirable results. Across California total foster placements (including traditional foster care and kin care) declined more than 48% from 2000 to 2017 (101,241 to 53,095).² The decline in the number of

² Child Welfare Services and Adult Protective Services Realignment Report (“Realignment Report”), June, 2018 (p. 3).

children in all types of foster placements has been even steeper in Alameda County: from approximately 3,500 in 2010 to 1,222 as of year-end 2018, a 65% decrease.³

Decrease in Substantiated Cases of Foster Child Maltreatment

The Grand Jury learned that the reported frequency of substantiated instances of maltreatment of foster children in California is below the “national standard” (7.57 per 100,000 foster care days in California versus the national standard of 8.50). While no amount of foster child abuse and neglect can ever be deemed acceptable, the statistics for Alameda County are significantly better. For the one-year period ending September 30, 2018, the Alameda County “maltreatment in foster care” rate was 2.89 per 100,000 foster care days. In nine of the ten previous years, the Alameda County maltreatment rate decreased (from an above national standard rate of 11.28 as of 2008 to 2.89 in 2018).⁴

Out-of-County Placements

Many California counties, particularly in high cost-of-living parts of the state, struggle to maintain an adequate inventory of approved foster homes. Alameda is one such county. The inadequate supply of approved foster homes (or, to use more up-to-date terminology: “resource families”) results in many Alameda County children being sent to live elsewhere. The Grand Jury has learned that out-of-county placements (unless made to secure a kinship opportunity or to address the special needs of a given child) are disfavored by child welfare professionals, for a number of reasons:

Too many of the county’s children have been, and continue to be, placed in out-of-county foster homes, despite substantial evidence that such placements are generally not in the best interests of the children.

- 1) An out-of-county placement can interfere with on-site visitations and create other logistical hurdles for an already overburdened social worker assigned to monitor a foster child’s progress;
- 2) Despite published guidance from CDSS on interactions between child welfare officials of the home county and the host county, multiple witnesses reported that out-of-county placements can be negatively impacted by miscommunication between the home and host counties, and confusion about their respective roles and responsibilities;⁵
- 3) An out-of-county placement can make it impractical for a foster child to attend and participate in juvenile court proceedings in his or her home county;
- 4) An out-of-county placement can impede parental and other family visits with the foster child;

³ DCFS data submission to Grand Jury (02/28/2019)

⁴ California Child Welfare Indicators Project, http://cssr.berkeley.edu/ucb_childwelfare/

⁵ See *Statewide Intercounty Protocol for Resource Family Approval and Emergency Placements* (04/05/2017) (available on CDSS website).

- 5) Behavioral health counseling and other needed services can be difficult to arrange if a child is placed outside of his or her home county; and
- 6) An out-of-county placement is often arranged and supervised by a Foster Family Agency (FFA), rather than directly by the home county child welfare agency that is ultimately responsible for the foster child's well-being.

Social Worker Caseloads

Child welfare experts agree that social worker caseloads must be kept at reasonable levels. As caseloads rise, the ability of social workers to make sure that the physical, mental and emotional needs of the children they serve, diminishes. The opportunity for foster children “to grow into self-sufficient, successful adults” suffers.⁶

The state does not prescribe specific child welfare social worker caseload limits, but the Child Welfare Services Workload Study commissioned by CDSS pursuant to Senate Bill 2030 (SB 2030 Study) identified minimum and optimum caseload standards for child welfare social workers.⁷ Nearly two decades later, the SB 2030 Study remains the principal benchmarking tool for social worker caseloads in California.⁸

Continuum of Care Reform

In 2015, the California legislature passed, and Governor Jerry Brown signed into law, Assembly Bill 403, which is known as the Continuum of Care Reform (CCR) bill. CCR made sweeping changes to the state's child welfare system, with those changes taking effect in stages through and including 2021.⁹ CDSS issued detailed Resource Family Approval Written Directives¹⁰ and a series of All County Information Notices to guide counties in implementing the CCR.

A key tenet of the CCR is that a Child and Family Team (CFT) should be established for each child who enters the foster care system. According to the CDSS: “There is an increasing body of evidence showing that services for children and families are most effective when delivered in the context of a single, integrated team that includes the child or youth, his or her family, natural and community supports, and professionals. In California, the Child and Family Team (CFT) process is key to the success of the Continuum of Care Reform efforts and the well-being of children”¹¹

⁶ Realignment Report, p. 18.

⁷ https://www.cwda.org/sites/main/files/file-attachments/cws_sb2030study.pdf

⁸ DCFS answers to supplemental Grand Jury questions.

⁹ Welfare and Institutions Code, Section 16000, et seq.

¹⁰ Available on the CDSS website. Version 5 of the Written Directives (111 pages) was issued with an effective date of 02/06/2018.

¹¹ CDSS website

INVESTIGATION

In this investigation, the Grand Jury heard testimony from DCFS management, a child welfare legal specialist, a court-appointed child welfare advocate, and several child welfare social workers. Documents that the Grand Jury reviewed included: California child welfare statutes and regulations, CDSS reports and directives to county child welfare agencies, DCFS reports and procedural materials, a child welfare database maintained by UC Berkeley, and published reports from the Child Welfare League of America (CWLA) and other organizations.

Based upon the foregoing, the Grand Jury has identified the following areas of concern:

1. An insufficient supply of approved foster homes in Alameda County, a problem that was not effectively addressed by recruitment and retention efforts to date

DCFS management informed the Grand Jury that there are currently about 220 approved foster homes in Alameda County, down from a supply of some 400 homes a few years ago. Despite the decreased size of the county's foster child population, the steep decline in the number of approved in-county foster homes results in more children being sent out-of-county.

To explain the shortage of approved in-county foster homes, DCFS management points to: 1) the high cost of living in Alameda County makes it financially difficult for otherwise willing county residents to serve as resource families; and 2) the lackluster results of traditional recruitment activities such as distributing foster parenting information at the county fair and other public events. The Grand Jury understands and accepts that the high cost of living in Alameda County makes foster parent recruitment here difficult. But, we also find evidence that there may be recruitment strategies available that would generate a larger pool of foster parent applicants. For example, in 2017 the Human Services Agency in San Francisco (a very high cost of living area) experienced a 300% increase in foster parent applications after it engaged a tech sector firm to create a mobile-friendly online application process and a user-friendly recruiting website.

The DCFS needs to devote priority attention to identifying and implementing innovative recruitment strategies to increase the supply of approved in-county foster homes. Accordingly, the Grand Jury was pleased to learn that DCFS recently contracted with the same firm that helped San Francisco achieve an impressive boost in foster parent applications.

2. An excessive number of out-of-county placements

The reasons why out-of-county placements are disfavored by child welfare experts are outlined earlier in this report. Available data demonstrate that Alameda County sends a significantly

higher percentage of its foster children to out-of-county placements than do most other heavily-populated and/or high cost of living counties:¹²

| | Placements | Out-of-County % |
|---------------|---------------------|-----------------|
| Statewide | 59,223 | 22.3% |
| Alameda | 1,407 ¹³ | 50.9% |
| Contra Costa | 1,076 | 28.6% |
| Los Angeles | 20,859 | 17.3% |
| Orange | 2,480 | 22.3% |
| Sacramento | 2,364 | 20.4% |
| San Diego | 2,385 | 8.9% |
| San Francisco | 760 | 63.2% |
| Santa Clara | 1,117 | 26.2% |

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Alameda County’s high percentage of out-of-county placements (50.9%), a figure exceeded in the above sampling only by San Francisco, is not driven by kin caregiver placements. To the contrary, the out-of-county placement percentage increases (to 56.7%) if kincare placements are excluded and only traditional foster home (including FFA) placements are considered.

DCFS must reduce the frequency of out-of-county traditional foster care placements by increasing the supply of approved in-county foster homes. To that end, the need for new recruitment strategies has been discussed above. A second possible remedy is to alter the mix of placement types by aggressively seeking more kincare placements. The percentage of out-of-county placements becomes less of a concern as the placement mix shifts in favor of kincare placements. DCFS management reported that it has three staff members working full-time on the task of locating potential kin caregivers. Dedicating staff resources to this function seems wise. The Grand Jury encourages DCFS to assess whether the current allocation of staff resources is sufficient. A potentially useful point of comparison is the Upfront Family Finding (UFF) pilot program launched by the Los Angeles County Department of Children and Family Services in 2016. The LA pilot involved assigning specialized workers who are dedicated to the task of

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¹² As of July 1, 2018, California Child Welfare Indicators Project (“CCWIP”) (cssr.berkeley.edu/ucb_childwelfare/)
¹³ Information received from DCFS shows a total 2,009 placements (new placements and placement changes of all types) in 2018. Of that total, 56.8% (1,246) were out-of-county placements. We note that the 50.9% figure referenced in the above table is based on a snapshot of placements as of a specific date (07/01/2018)

“family finding” when children are first removed from their homes. According to a published report, LA County’s “UFF pilot program met its goal of increasing relative placements and engaging more relatives to provide support to children.”¹⁴

3. An excessive use of Foster Family Agencies to arrange and supervise foster care placements

A Foster Family Agency (FFA) is a state-licensed organization, generally a non-profit that engages in: 1) recruiting, certifying and training resource families; and/or 2) finding homes where foster children can be placed. The Grand Jury received information indicating that about 25% of Alameda County’s foster care placements are made through FFAs.

The county does not enter into contracts with the FFAs it utilizes. The county pays each FFA a flat rate per child that is somewhat higher than the rate that a resource family typically receives. The higher amount is intended to cover the FFA’s overhead and the cost of services provided to foster children and resource families.

The Grand Jury learned that a preponderance of the foster placements that FFAs arrange for Alameda County are in out-of-county homes: 81.1% as of December 31, 2018.¹⁵

Multiple witnesses, including social workers, a child welfare advocate and a child welfare legal specialist, told the Grand Jury that the quality of FFAs varies widely and that there is little or no county oversight of FFAs. This last point was borne out by the testimony of, and documents received from, DCFS management, which painted a disturbing picture of the county’s hands-off relationship with its FFAs. The county does not vet FFAs beyond verifying that they have been licensed by California Community Care Licensing. The FFAs recruit, train and select foster parents without county involvement. Foster home inspections are considered the responsibility of the FFAs, not the DCFS.

The Grand Jury was told that many FFAs do an excellent job of protecting the interests of the foster children referred to them. However, we also received, and find credible, testimony concerning the “sketchy” competence of some FFAs. That concern is magnified for the Grand Jury by the disproportionate rate at which FFA placements are made out-of-county and by the absence of any meaningful County oversight of FFA operations. DCFS action, as recommended herein by the Grand Jury, to reduce the frequency of out-of-county placements of Alameda County foster children should also have the salutary effect of reducing the County’s dependence on the services of FFAs. Beyond that, and recognizing that some meaningful percentage of foster placements will continue to be made through FFAs, we encourage DCFS to develop and

¹⁴ <https://www.childtrends.org/publications/evaluation-of-los-angeles-countys-upfront-family-finding-pilot>

¹⁵ According to the California Child Welfare Indicators Project, the percentage of Alameda County’s FFA placements that were out-of-county as of a slightly earlier date (July 2018) was 71.6%. The considerable differential between that figure (which is, as we understand it, based on county-reported information) and the figure cited in the text above (81.1%) may be attributable to differing reporting protocols. But, if the FFA out-of-county percentage really jumped nearly 10 percentage points in the span of just six months, we trust that DCFS will look into the reason(s) for that disturbing development.

implement a robust plan of action for vetting and periodically reassessing those FFAs to which it entrusts the care of Alameda County children.

4. Alameda County child welfare social worker caseloads are too high, particularly when viewed in light of the significant percentage of out-of-county placements

The seemingly unanimous view of child welfare experts is that the interests of foster children are directly and negatively impacted if social worker caseloads are not kept at a reasonable level. A child welfare legal specialist told the Grand Jury that the appropriate caseload range for child

Child welfare social worker caseloads are too high, despite clear evidence that excessive caseloads interfere with the delivery of high quality child welfare services.

welfare social workers is 12 – 15. Other sources agree. For example, the Child Welfare League of America (CWLA) “recommends that foster care caseworkers have caseloads of 12 – 15 children.”¹⁶ In a 2003 report, the US General Accounting

Office referenced the CWLA’s recommended “caseload ratio of 12 to 15 children per social worker” and found that observed caseloads in some jurisdictions of 24 to 31 were interfering with the recruitment and retention of child welfare workers and undercutting the delivery of effective child welfare services.¹⁷

DCFS informed the Grand Jury that the SB 2030 Study conducted in 2000 remains the only study of child welfare social worker caseloads in California. The SB 2030 Project Team of expert consultants worked with an advisory group of caseworkers and administrators to identify both “minimum”¹⁸ and “optimum” caseload standards for each of four categories of child welfare social workers: Emergency Response; Family Maintenance; Family Reunification; and Permanency Placing.

The major takeaway here is that Alameda County, like most of the other counties reported on in the Realignment Report, should reduce social worker caseloads. Doing so would improve the delivery of child welfare services.

¹⁶ California’s Children 2017, www.cwla.org

¹⁷ www.gao.gov/ggi-bin/getrpt?GAO-03-357

¹⁸ The caseload figures identified in the 2030 Study as “minimum” standards are, we believe, more reasonably understood as recommended maximum caseloads.

The CDSS’s 2018 Realignment Report included data illustrating how social worker caseloads in each of seven counties, including Alameda, compared with the SB 2030 minimum and optimum standards¹⁹:

| | Emergency Response | Family Maintenance | Family Reunification | Permanency Placing |
|----------------------------|---------------------------|---------------------------|-----------------------------|---------------------------|
| SB 2030 Minimum Std | 13.03 | 14.17 | 15.58 | 23.67 |
| SB 2030 Optimum Std | 9.88 | 10.15 | 11.94 | 16.42 |
| | | | | |
| Alameda | 24.99 | 16.79 | 11.87 | 21.74 |
| Los Angeles | 9.40 | 18.95 | 19.04 | 19.23 |
| Sacramento | 16.28 | 17.65 | 12.72 | 30.80 |
| San Francisco | 6.37 | 9.86 | 10.29 | 14.38 |
| San Diego | 16.75 | 16.46 | 13.74 | 12.56 |
| Santa Clara | 7.83 | 14.96 | 10.68 | 15.93 |
| Sonoma | 29.99 | 23.54 | 15.85 | 19.03 |

With respect to two of the four social worker categories (family reunification and permanency planning), the county-specific information provided in the Realignment Report supports DCFS management’s testimony to the Grand Jury that average caseloads for its social workers are generally below the 2030 Study. For the other two categories (emergency response and family maintenance), however, the Alameda County figures are considerably higher than the 2030 “minimum” and nowhere near “optimum.” Viewed from another perspective, the reported Alameda County caseloads fall within the CWLA recommended range of 12 – 15 in only one of four categories (family reunification). Exceeding the recommended caseload range strikes the Grand Jury as a particular problem in a county, such as Alameda, where a high percentage of a social worker’s assigned cases are apt to involve out-of-county placements.

The major takeaway here is that Alameda County, like most of the other counties reported on in the Realignment Report,²⁰ should reduce social worker caseloads. Doing so would improve the delivery of child welfare services.

¹⁹ Drawn from Realignment Report, p. 36

²⁰ The notable exceptions are San Francisco, where caseloads are better than the SB 2030 “optimum” standards in all categories, and Santa Clara, where caseloads are better than “optimum” in three of four categories.

5. Undue DCFS delay in implementing the state-mandated Child and Family Team process for making and monitoring foster care placements

The Child and Family Team (CFT) is a centerpiece of California’s Continuum of Care Reform (CCR) legislative overhaul of the foster care system. CCR, which was signed into law in 2015,

DCFS has dragged its feet in implementing the Child and Family Team construct mandated in California’s 2015 legislative overhaul of the foster care system, despite compelling evidence that embracing CFT would serve the best interests of our children.

included a mandate that all of the state’s counties establish a CFT for all new foster placements on and after January 1, 2017. More than two years after that date, witnesses informed the Grand Jury that Alameda County DCFS had not yet fully implemented the CFT process. Rather, witnesses testified that DCFS was still using an approach to foster care

placement known as Team Decision Making (TDM). DCFS management acknowledged that as of February 2019 the agency was still in the process of “converting” from TDM to CFT. DCFS anticipates completing this conversion in mid-2019.

TDM and CFT are not two peas in a pod. It is beyond the scope of the Grand Jury to identify precisely how they differ, but the essential learning we have gained is that TDM is a process heavily focused on foster child placement, whereas CFT has a much wider scope. CFT involves assembling and periodically reconstituting a team that is charged with assessing and developing plans to support the full range of a child’s needs and interests (including medical, emotional, social and educational) from initial placement throughout his or her time in the foster care system. Consistent with this wide scope of responsibility, a typical CFT might be comprised of a child welfare social worker, a court-appointed special advocate, the foster child, the child’s family, the resource family, medical professionals, teachers and/or school administrators, and possibly others who play a meaningful role in the child’s life.

Nearly four years ago, all county child welfare agencies were directed to adopt the CFT process for all new foster placements on and after January 1, 2017. It is well past time for full implementation of the CFT model in Alameda County.

Protecting the interests and well-being of children who enter Alameda County’s foster care system is a daunting responsibility. Our investigation disclosed a generally encouraging picture of how well the Social Services Agency’s Department of Children and Family Services has carried out that responsibility, while also revealing some significant opportunities for improvement.

CONCLUSION

Protecting the interests and well-being of children who enter Alameda County’s foster care system is a daunting responsibility. Our investigation disclosed a generally encouraging picture of how well the Social Services Agency’s Department of Children and Family Services has carried out that responsibility, while also revealing some significant opportunities for improvement.

On the plus side, the Grand Jury commends DCFS’s dedicated management and staff for pursuing sound family preservation and reunification initiatives, for making steady and substantial progress in drawing down the number of Alameda County children living in traditional foster care settings, and for overseeing a foster care system that in recent years has incurred relatively few substantiated cases of foster child abuse and neglect.

On the less flattering side of the ledger, the Grand Jury concludes that:

- Too many of the county’s children have been, and continue to be, placed in out-of-county foster homes, despite substantial evidence that such placements are generally not in the best interests of the children,
- Child welfare social worker caseloads are too high, despite clear evidence that excessive caseloads interfere with the delivery of high quality child welfare services, and
- DCFS has dragged its feet in implementing the Child and Family Team approach mandated in California’s 2015 legislative overhaul of the foster care system, despite compelling evidence that embracing CFT would serve the best interests of our children.

The problems identified in this investigation do not look to be intractable. The Grand Jury believes that DCFS can and will make good progress on all fronts.

Acronyms

| | |
|-------|---|
| CCR | Continuum of Care Reform |
| CCWIP | California Child Welfare Indicators Project |
| CDSS | California Department of Social Services |
| CFT | Child and Family Team |
| CWDA | County Welfare Directors Association |
| CWLA | Child Welfare League of America |
| DCFS | Department of Children and Family Services |
| FFA | Foster Family Agency |
| SSA | Alameda County Social Services Agency |
| TDM | Team Decision Making |
| UFF | Upfront Family Finding |

FINDINGS

Finding 19-26:

The Department of Children and Family Services has not recruited and retained an adequate number of approved foster homes within Alameda County.

Finding 19-27:

An excessive percentage (more than half) of Alameda County's foster care placements are made to homes located outside of Alameda County, despite evidence that out-of-county placements are generally not in the best interests of foster children.

Finding 19-28:

Average caseloads for Department of Family and Child Services emergency response and family maintenance child welfare social workers are too high, which is not conducive to the delivery of high-quality services to Alameda County's foster children.

Finding 19-29:

The Department of Children and Family Services has not been timely in its implementation of the Child and Family Team concept that is a central element of California's Continuum of Care Reform legislation.

RECOMMENDATIONS

Recommendation 19-26:

The Department of Children and Family Services must address the shortage of in-county foster homes by implementing more effective resource family recruitment strategies and techniques. Aggressively moving forward with plans the agency has formulated for revamping and revitalizing foster parent recruitment activity is strongly recommended.

Recommendation 19-27:

The Department of Children and Family Services must develop and implement a strategy for significantly reducing the percentage of out-of-county foster home placements. Any strategy to achieve that goal should include measures to reduce Alameda County's utilization of foster family agencies.

Recommendation 19-28:

The Department of Children and Family Services must reduce social worker caseloads to levels that meet expert recommendations.

Recommendation 19-29:

The Department of Children and Family Services must devote priority attention to completing its conversion from Team Decision Making to the Child and Family Team approach called for in the Continuum of Care Reform bill.

RESPONSES REQUIRED

Alameda County Board of Supervisors

Findings 19-26 through 19-29

Recommendations 19-26 through 19-29

REQUEST FOR RESPONSES

Pursuant to California Penal Code sections 933 and 933.05, the Grand Jury requests each entity or individual named below to respond to the enumerated Findings and Recommendations within specific statutory guidelines:

Responses to Findings shall be either:

- Agree
- Disagree Wholly, with an explanation
- Disagree Partially, with an explanation

Responses to Recommendations shall be one the following:

- Has been implemented, with a brief summary of the implementation actions
- Will be implemented, with an implementation schedule
- Requires further analysis, with an explanation and the scope and parameters of an analysis or study, and a completion date that is not more than 6 months after the issuance of this report
- Will not be implemented because it is not warranted or is not reasonable, with an explanation

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