

DEPARTMENT OF SOCIAL SERVICES

CHILDREN'S DIVISION

P. O. BOX 88

JEFFERSON CITY, MISSOURI

NOVEMBER 15, 2006

MEMORANDUM**What's Inside:**

- Request for Policy Interpretation Process

TO: REGIONAL EXECUTIVE STAFF, CIRCUIT MANAGERS, AND CHILDREN'S DIVISION STAFF

FROM: PAULA NEESE, DIRECTOR

SUBJECT: REQUEST FOR POLICY INTERPRETATION

DISCUSSION:

The purpose of this memorandum is to introduce the Request for Policy Interpretation process to the Administrative Section of the Child Welfare Manual (CWM); Section 8, Chapter 8, entitled Request for Policy Interpretation. This policy provides a process for requesting interpretation of policy.

Who may Initiate a Request for Policy Interpretation?

Any Children's Division (CD) staff may submit a request for policy interpretation by completing the CS-77 form. Staff should route the CS-77 form through normal supervisory channels, which is outlined below.

Preparing and Completing a Request for Policy Interpretation

1. The CD staff in need of policy interpretation should consult with his/her immediate supervisor for assistance.
2. If policy questions are not answered at the Circuit level, the requesting CD staff should complete the CS-77 form and forward it to the Regional Office for clarification. The CS-77 form may be accessed on the Children's Division E-forms page.
3. In the event that policy questions are unable to be answered at the Regional level, the completed CS-77 form should be submitted to Central Office via email to CD.PolicyInte@dss.mo.gov (and copied to the requesting worker, supervisor and Circuit Manager) by the Regional Office. The completed CS-77 form may also be faxed to 573-526-3971, if staff is unable to access email.

Response Process to a Request for Policy Interpretation by Central Office

1. Upon receipt of the CS-77 form in Central Office, the form will be assigned to the appropriate Unit Manager and Program Development Specialist (PDS) for completion.
2. The assigned PDS will have five (5) working days from the date of assignment to research and write a response.

3. A written response will be sent to the requesting CD staff and the Regional Office. Questions and responses will be posted on the CD home page under Policy Interpretation.
4. In the event, that a response requires consultation with Division of Legal Services (DLS), a referral will be made and Regional Office will be notified of the requested consultation. A response will be forwarded to the Regional Office upon receipt in Central Office.
5. Staff should proceed through normal supervisory channels to address policy interpretation questions that require an immediate response. A CS-77 form is not needed under these circumstances.

Note: This process is not intended for the submission of policy suggestions to enhance or create new policy. These types of suggestions should be submitted in memorandum or letter form, and should be routed through normal supervisory channels. The CS-77 form should not be used for this purpose. Additionally, at no time should the CS-77 form be utilized to request a policy exception.

The request for policy interpretation process is not intended to replace or supersede consultation with supervisors at the Circuit and Regional level. All Children’s Division staff will have the ability to access the policy interpretation questions and responses via the Intranet. Staff may go to the CD homepage and click on Policy Interpretation to review posted information. This link will be updated on a monthly basis. This resource will assist the CD in supporting and enhancing statewide consistency in policy interpretation.

When request for a policy interpretation results in a need to change the Child Welfare Manual (CWM), these changes will be initiated through the normal memorandum and policy implementation process. Each policy interpretation question will be tracked by Central Office for identifying policy that may need to be clarified in the CWM or requires additional training to the Children’s Division staff.

NECESSARY ACTION:	
<ol style="list-style-type: none"> 1. Review this memorandum with all Children’s Division staff. 2. Review revised Child Welfare Manual chapters as indicated below. 3. All questions should be cleared through normal supervisory channels and directed to: 	
PDS CONTACT: Alicia Jenkins 573-751-0311 Alicia.Jenkins@dss.mo.gov	PROGRAM MANAGER: Kathryn Sapp 573-522-5062 Kathryn.Sapp@dss.mo.gov
CHILD WELFARE MANUAL REVISIONS: Section 8, Chapter 8 . Request for Policy Interpretation	
FORMS AND INSTRUCTIONS: CS-77 form and Instructions.	