

**ORANGE COUNTY SOCIAL SERVICES AGENCY  
CFS OPERATIONS MANUAL**

**Effective Date: March 12, 2013**  
**Revision Date: March 31, 2026**

**Number: M-0109**

## **Child Abuse Hotline**

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**Purpose** To provide guidelines for assessing child abuse and neglect allegations and determining disposition, response time, and assignment of child abuse reports.

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**Approved** This policy was approved by Loan English, Director of CFS.  
*Signature on file.*

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**Most Recent Revision** This revision of the Policy and Procedure (P&P) includes:

- Updates to reflect the current program name and terminology
- Updates to Attachments to reflect the current program name and terminology:
  - [Attachment 1—Emergency Response Protocol](#)
  - [Attachment 2—Referral Response Options](#)
  - [Attachment 3—Mandated Reporter Written Follow-Up Report: Suggested Guidelines](#)
  - [Attachment 4—SCMS Practice Guide for DA Communications](#)
  - [Attachment 5—Processing Sensitive Referrals: Suggested Guidelines](#)
- Removal of obsolete forms:
  - CAR Daily Statistical Sheet (F063-04-68)
  - Orange County Social Services Agency Child Abuse Report (F063-04-49A)
- Guidance for collateral contacts by Hotline SSW
- Updated guidance regarding requirements for non-mandated reporters per ACL 25-38
- Updates per the Holman v Butte decision, which highlights that the duty to cross-report is mandatory and not discretionary

- Removal of guidance related to Information Only Hotline dispositions
  - Inclusion of policy section “Information and Referral (I&R) Calls”
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## Background

In 1974, the Orange County Board of Supervisors established the Child Abuse Registry, a program within the Social Services Agency (SSA), Children and Family Services (CFS), to centralize the reporting of child abuse within Orange County. On February 1, 1975, a 24/7 hotline was initiated to receive reports of child abuse. The program has since been renamed the Child Abuse Hotline. The Child Abuse Hotline is often the first point of contact the community has with SSA and remains one of the primary points of entry into child protective services for children and their families.

The primary role of Hotline staff is to evaluate reports received from mandated and non-mandated reporters alleging child abuse and neglect to determine the level of risk and need for intervention services. In addition, Hotline staff:

- Process and distribute child abuse reports to local and state law enforcement agencies
  - Maintain a countywide index of child abuse reports
  - Provide consultation to mandated reporters concerning reporting responsibilities and mandatory follow-up reports
  - Provide information and referrals to callers for a variety of services such as counseling, temporary shelters, drug and alcohol abuse treatment programs, medical clinics, housing, and parenting resources
  - Provide training for mandated reporters on child abuse and neglect issues and mandated reporting laws
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## Definitions

For purposes of this Policy and Procedure (P&P), the following apply:

**Child Abuse and Neglect Reporting Act (CANRA):** Defines child abuse, establishes procedures to report and investigate child abuse, and imposes an obligation to report child abuse on certain individuals. “The intent and purpose of (CANRA) is to protect children from abuse and neglect” (Penal Code (PEN) Section (§) 11164).

**Collateral Contact:** An individual, other than the Reporting Party (RP), who may have information relevant to the reported child abuse allegation, or who may be able to provide additional information

concerning the reported child and/or family. A collateral contact may have a personal relationship with the child/ family (e.g., relative, friend, neighbor), or a professional relationship with the child/family (e.g., law enforcement, medical provider, mental health provider, teacher, etc.).

**Companion-To-Case (C-To-C) Referral:** Two or more separate referrals assigned together that have a common element that links them such as two families sharing the same residence, blended family situations, or the same alleged perpetrator involving children from different mothers.

**Differential Response (DR):** An alternative response system that enables CFS to respond in a more flexible manner to reports of abuse or neglect. Orange County CFS has three systems, or “paths,” of responses: Path 1 (community response); Path 2 (dual response between CFS and community-based organizations); Path 3 (CFS-only response).

**Emergency Response (ER) Protocol:** Developed from regulations outlined in CDSS Division 31-105, the ER Protocol is used by child welfare agencies receiving a referral of alleged child abuse or neglect to determine whether an in-person investigation is required. The ER Protocol specifies the minimum information that must be gathered to determine if an in-person investigation is required.

**Evaluate Out (E/O) Report:** Report taken when the information provided by the RP meets the legal definition of child abuse or neglect or alleges harm or risk of harm to a child, however, an in-person response by CFS is not warranted. An E/O report may be cross-reported to another agency that has jurisdiction to investigate (e.g., law enforcement or Community Care Licensing). E/O reports are also used to document a report from a reporting party that is a duplicate to a prior report from a different mandated reporter that has already been or is currently being investigated by Orange County.

**Hotline:** Alternate term commonly used for the 24/7 Orange County Child Abuse Hotline.

**Mandated Reporter:** A person who, pursuant to CANRA, is required to report knowledge or reasonable suspicion of child abuse which is obtained while acting in a professional capacity or within the scope of their employment (refer to PEN § 11165.7 for a list of mandated reporters).

**Multi-Disciplinary Consultation Team (MDCT):** A collaboration of representatives from the SSA, Health Care Agency (HCA), Orange County Probation Department, and Orange County Department of Education (OCDE) that work with families of non-dependent children who are experiencing mental health issues, parent/child conflicts including threat of parental abandonment, threats by the child to harm family members, or under utilization of needed community services such as education, Regional Center, or California Children’s Services.

**Non Minor Dependent (NMD):** A current or former dependent child or ward of the Juvenile Court, who is 18 but less than 21 years of age, in a foster care placement under the responsibility of the county SSA, county Probation department, or Indian tribe and participating in a transitional independent living case plan (TILP). NMDs are required to meet specific participation criteria to remain eligible for services.

**Referral:** A report of suspected child abuse or neglect. In CWS/CMS, the referral contains all relevant information including client demographic information, reporter information, collateral information, allegation(s), alerts, and response type. The information contained in the referral is used by the investigating SSW as a baseline document in the investigation of the alleged child abuse or neglect.

**Reporting Party (RP):** The person who contacts the Child Abuse Hotline to report an incident of suspected child abuse or neglect. The RP can be either a mandated or non-mandated reporter.

**Screener Narrative:** A document in CWS/CMS that presents narrative details of a child abuse referral that is provided by the RP and elaborated on by the screener (i.e., Hotline SSW) through any further contacts with collaterals and a review of any current or prior referral or case history.

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## POLICY

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### Taking Reports

Child Abuse Hotline staff will provide initial intake and evaluation of risk screening for children reported to the Hotline as alleged victims of abuse, neglect, or exploitation.

**Note:** If the RP provides information regarding the abuse of an elder or dependent adult, in addition to child abuse and neglect allegations

regarding the same family, Hotline staff will process the Adult Protective Services (APS) report as outlined in CFS P&P [Adult Protective Services \(APS\) Hotline \(A-0209\)](#).

Hotline staff will maintain confidentiality pursuant to WIC §§ 15633–15633.5, and will not reference the APS report:

- On any Hotline documentation (e.g., CWS/CMS screener alert field, Child Abuse Hotline screener narrative, Hotline Daily Statistical Sheet etc.)
- During verbal notification of the child abuse report to CFS staff (e.g., when the case carrying SSW is notified that a report was received)

These guidelines also apply to reports received by the Child Abuse Hotline via the OC mandated Reporter Application (OCMRA), fax, mail, SSA email (AccessOC), or in-person (i.e., “walk-ins”).

Per PEN § 11165.9, the Child Abuse Hotline will accept reports of abuse or neglect from both mandated and non-mandated reporters even if CFS lacks agency or geographical jurisdiction to investigate the reported information.

The Hotline SSW will obtain as much information as needed to confirm the referral falls within jurisdictional parameters of another county or agency. The Hotline SSW will immediately, or as soon as practicably possible, cross-report the referral by telephone, fax, or electronic transmission to the county or agency with proper jurisdiction. For additional information on cross-reporting, see Policy section “Cross-Reporting.”

Per CFS policy, Child Abuse Hotline contacts that are not regarding a report of abuse or neglect and/or not documented into CWS/CMS (i.e., calls, walk-ins, faxes, mail-in reports, and email reports) will be recorded on the *Child Abuse & APS Hotline Calls Not Documented in Systems Log*.

The Hotline SSW will obtain known demographic information from the RP and will complete the Emergency Response Protocol as outlined in MPP Division 31-105. Per ACL 25-38, when a non-mandated reporter is unwilling to provide certain demographic information (e.g., name, telephone number, information that led to the suspicion of child abuse or neglect), the screener will:

- Attempt to determine the basis for the refusal to provide the information.

—And—

- Advise the non-mandated reporter that their information would remain confidential.

**Note: The** Hotline SSW will take a report from a mandated reporter even if the mandated reporter is unable to provide all requested information. Per CFS policy, reports that meet the legal definition of child abuse or neglect or alleges harm or risk of harm to a child, that cannot be investigated due to lack of necessary information will be documented in CWS/CMS as an E/O report. For additional information, see Policy section “Referral Response Options.”

As indicated, the Hotline SSW will utilize the Emergency Response (ER) Protocol (outlined in MPP Division 31-105) to obtain all relevant information and determine:

- If the information provided meets the legal definition for child abuse or neglect
- Whether or not an in-person response by CFS is required
- How quickly a response needs to be made

**Note:** For more detailed information on taking reports specific to sexual abuse allegations, refer to CFS P&P [Sexual Abuse Allegations—Child Abuse Registry \(CAR\) \(A-0205\)](#).

The Hotline SSW will search in the CWS/CMS to locate any current or prior referral or case history for the alleged victim(s), family members, household members, or alleged perpetrator (if not a family or household member). A search will be completed for all reports made to the Child Abuse Hotline, including E/O reports.

As appropriate, the Hotline SSW will create a referral in CWS/CMS for the following types of reports:

- In-person Response
- E/O

**Emergency Response (ER) Protocol**

Per MPP Division 31-105, the Hotline SSW will utilize the ER Protocol process when it is necessary to determine if an in-person investigation is required. The ER Protocol process is not necessary when the Hotline SSW has already determined an in-person investigation is indicated (e.g., Police Response Protocol, obvious immediate danger reports, etc.).

Refer to Attachment 1—Emergency Response Protocol for guidance in utilizing the ER Protocol.

The ER Protocol process is complete when enough information to determine whether or not an in-person investigation is required has been obtained from:

- The RP
- Necessary collateral phone contacts
- Search of child welfare history
- Hotline Supervisor consultation

**Structured  
Decision  
Making (SDM)**

Per CFS policy, the Hotline SSW will utilize:

- *SDM Screening* (i.e., screen-in) tool to determine whether or not a referral meets the statutory threshold for an in-person response as outlined in MPP Division 31-105
- *SDM Response Priority* tools to determine how quickly to respond to an allegation of abuse or neglect

A screen-in and/or response time as determined by SDM may be changed (i.e., “override”) due to forensic, safety, or best practice considerations. When the circumstances of the referral are not captured by any of the decision trees or corresponding overrides, the Hotline SSW will consult with the Hotline SSSS OD or a Hotline SSSS to request a discretionary override.

Per CFS policy, the Hotline SSW will submit the SDM Hotline Tool for supervisory approval.

For additional information on utilizing SDM Hotline Tools, refer to CFS P&P [Structured Decision Making \(D-0311\)](#).

**Decision  
Criteria**

Per MPP Division 31-105, the decision as to whether or not an in-person investigation is necessary will include, but is not limited to, consideration of the following factors:

- Ability to locate the child and/or family
- Existence of an open case or referral and whether the reported allegation is being adequately addressed by the assigned SSW
- Allegation meets one or more of the definitions of child abuse, neglect, or exploitation as defined in MPP Division 31-002(c)(7), 31-002(e)(9), or 31-002(n)(1)
- Alleged perpetrator is a caregiver of the child or the caregiver was negligent in allowing, or unable or unwilling to prevent, the alleged perpetrator’s access to the child

- Allegation includes specific acts and/or behavioral indicators which are suggestive of abuse, neglect, or exploitation
- There is additional information from collateral contacts or records review that invalidates the reported allegation
- There are previously investigated inconclusive or unfounded reports from the same RP with no new allegations or risk factors

The Hotline SSW will use the Screener Narrative to document the decision to take a report as either an in-person investigation or as an E/O, and will include:

- The specific decision outcome
- A description of the alleged child abuse or neglect incident as provided by the RP
- As applicable, Senior Social Services Supervisor (SSSS) or Manager approval

**Referral Response Options**

Upon completion of the ER Protocol process outlined in MPP Division 31-105, and SDM, the Hotline SSW will make a determination to assign the report to one of the following outcome options:

- Accept for investigation by CFS
- E/O with no referral to another community agency
- E/O with referral to an appropriate community agency

A. **Accept for Investigation by CFS**

1. **Immediate (“I”) Responses:** Per MPP Division 31-115, a referral will be assigned as an “I” response based on the following:

- The ER Protocol indicates the existence of a situation in which imminent danger to a child, such as physical pain, injury, disability, severe emotional harm, or death is likely
- A law enforcement agency reports that a child is at immediate risk of abuse, neglect, or exploitation
- The Hotline SSW determines that a child referred by a law enforcement agency is at immediate risk of abuse, neglect, or exploitation

2. **10-Day Responses:** Per MPP Division 31-120, a referral will be assigned as a 10-day response based on the following:

- The ER Protocol indicates that an in-person investigation is appropriate and the Hotline SSW has

determined that the child is not at immediate risk of abuse, neglect, or exploitation

- A law enforcement agency making the report has assessed that the child is not at immediate risk of abuse, neglect, or exploitation, and the Hotline SSW has determined that an in-person immediate response is not indicated

Per CFS policy, the Hotline SSW will enter 10-Day referrals into the CWS/CMS the same day that the report is received.

**B. No Investigation by CFS**

1. Evaluate Out (E/O) Reports: Per MPP Division 31-105, a report will be entered in the CWS/CMS as an E/O based on the following:

- The information provided meets the legal definition for child abuse, neglect, or exploitation.

–OR–

- The information provided alleges harm or risk of harm to a child but does not meet the criteria for in-person investigation by CFS.

–And–

- The ER Protocol decision criteria process indicates:
  - The victim child is unable to be located
  - There is already an open case or referral and the problem described in the allegation is being adequately addressed by the assigned SSW
  - There is additional information from collateral contacts or records review which invalidates the reported allegation (i.e., the allegation was previously investigated and closed, etc.)
  - There are previously investigated inconclusive or unfounded reports from the same RP with no new allegations or risk factors being reported

Per MPP Division 31-110, if the Hotline SSW determines an in-person investigation is not necessary, however, the services of another community agency are appropriate, a referral (i.e., cross-report) will be made to that agency as appropriate. If the family on an E/O referral requires supports, the Hotline SSW may consider referring the family

for Path 1 — Differential Response after consultation with a Hotline SSSS OD or Hotline SSSS.

When a report alleges child abuse by a non-family member who is not responsible for the child's care, the report will be cross-reported to law enforcement.

- a. E/O Does Not Meet Legal Definition for Response  
Per CFS policy, with limited exception, all reports from mandated reporters that do not meet the legal definition for child abuse, neglect, or exploitation will be entered in CWS/CMS as an E/O. The "Emergency Response Referral Document" generated by CWS/CMS will be printed out and submitted for Hotline SSSS approval.

**Note:** Reports that fall into select categories determined pursuant to program protocol will not be entered into CWS/CMS and will instead be maintained for reference purposes in a "Non-CWS/CMS Notebook." Refer to policy section, 'Information and Referral (I&R) Calls' for further information regarding calls that do not fall under CFS Jurisdiction.

In addition, reports from non-mandated reporters that do not meet the legal definition for child abuse, neglect, or exploitation may be entered in CWS/CMS as an E/O if the information provided indicates that a referral to another community agency or CFS program may be appropriate.

Per CFS policy, the Hotline SSW will consult with a Hotline SSSS OD or a Hotline SSSS prior to designating a report as an E/O Path 1—Differential Response.

The Hotline SSW will obtain available information from the reporter as outlined in MPP Division 31-105, prior to determining if the report will be taken as an E/O.

**Note:** Per CFS policy, to assist in confirming that an E/O disposition is appropriate, the Hotline SSW will request a review by an on-site Health Care Agency

(HCA) Public Health Nurse (PHN) when an E/O report involves medical issues for a reported child.

2. Information and Referral (I&R) Calls

When a report is received that does not fall under the jurisdiction of CFS (i.e., it does not indicate any form or risk of abuse or neglect), it is screened and, if appropriate, referred to other agencies for potential services. These calls are classified by CDSS as Information and Referral (I&R) calls and are not required to be assessed for risk.

a. CFS Informational Calls

These are calls related to an existing open case or referral, but which do not include different allegations of abuse or neglect. Information from these calls will be forwarded to the ASW via email.

b. General Informational Calls

These are calls in which the caller is seeking general information and does not express any concerns about a child. In Orange County, these are referred to as General Information Calls. While documentation is not always required, these calls may be recorded on the Child Abuse & APS Hotline Calls Not Documented in Systems Log.

Refer to Attachment 2—Referral Response Options for examples of referral response categories.

**Screener Narrative**

The Hotline SSW will document the following in the screener narrative:

- Pertinent details of a child abuse referral provided by the RP
- Contacts with collaterals
- Review of current and/or prior referrals and case history in CWS/CMS

Per PEN § 11167(d)(1), the identity of the RP is confidential.

To comply with the requirement to protect the identity of the RP, the Screener Narrative will not contain RP's:

- Name
- Relationship to the victim child
- Personal pronouns (i.e., "he" or "she")

**Consultation** The Hotline SSSs provide consultation to Hotline staff when there are questions or uncertainty about the level of response required and/or response time, or as requested by a Hotline SSW. Hotline SSWs may also consider consultation with additional resources that may be helpful in assessing safety and risk factors.

Per CFS policy, the Hotline SSW will document consultations in the designated location on the Screener Narrative.

**Mandated Reporter Follow-Up Report** PEN § 11166(a) requires mandated reporters to prepare and send, fax, or electronically transmit a written follow-up report within 36 hours of receiving the information concerning the child abuse or neglect situation.

**Exception:** Mandated reporters do **not** need to submit a separate written follow-up report when a child abuse report is filed through the Mandated Reporter Application (MRA). The MRA includes an option to provide follow-up report information within the application.

Mandated reporters have three options for filing a follow-up report:

- Mail-in (written)
- Fax (written)
- MRA (within application)

For guidelines on follow-up reports, including accessing the MRA, refer to Attachment 3—Mandated Reporter Written Follow-Up Report: Suggested Guidelines.

**Cross-Reporting** Per PEN § 11166(j), CFS is required to immediately, or as soon as practicably possible, cross-report by telephone, fax, or electronic transmission to the law enforcement agency having jurisdiction over the case, to the agency given the responsibility for investigation of cases under WIC § 300, and to the District Attorney's (DA's) office, every known or suspected instance of child abuse or neglect. CFS is not required to cross-report allegations of General Neglect or Caretaker Absent/Incapacitated to law enforcement or the DA.

To meet the cross-reporting requirement when the referral falls within the jurisdictional parameters of another child welfare agency, Hotline SSWs contact the agency via telephone. The Hotline SSW or designee (e.g., clerical) will transmit the follow-up written referral information via fax or electronic transmission.

To meet the cross-reporting requirement to law enforcement and the DA, Hotline clerical staff:

- Send a CWS/CMS generated report to the appropriate law enforcement agency per established protocols (e.g., fax, e-fax, mail)
- Utilize Secure Communication Management System (SCMS) web-based email system to notify the DA
  - For instructions on utilizing the SCMS system, refer to Attachment 4—SCMS Practice Guide for DA Communications

In addition to cross-reporting to law enforcement and the DA as outlined above, PEN §§ 11166.1 and 11166.2 require CFS to cross-report all reports of abuse and neglect to have occurred by resource parents and day care providers (licensed and non-licensed) which occur at day care facilities to:

- Community Care Licensing (CCL) (for Foster Family Agency [FFA]/STRTPs/Orangewood Children and Family Center [OCFC])
- CFS Foster Care Licensing (FC Licensing) (for Foster Family Homes [FFH])

CFS Differential Response, in accordance with WIC § 830, enables cross-reports to community partners (e.g., Path 1) or community/CFS collaborative programs (e.g., MDCT).

**Staff  
Notifications  
and Special  
Incident  
Reports (SIRs)**

Per CFS policy, the Hotline SSW will promptly notify the assigned SSW and SSSS when a new report of child abuse or neglect (including E/O reports) is received on an open referral or case.

Per SSA policy, notification to designated CFS staff of adverse circumstances involving potential, former, and current clients is completed via the use of a *Special Incident Report (SIR) (F063-03-48)*.

When a report involves individuals and/or facts that may generate media interest (e.g., elected official, County department head, child fatality or near fatality, safely surrendered baby, etc.), the Hotline SSW will notify the assigned SSW, SSSS, Manager, and other designated CFS personnel via the chain of command utilizing the *SIR (F063-03-48)*.

As needed, the Hotline SSW will consult with a Hotline SSSS to assist in determining if the reported information indicates the need for administrative notification via the *SIR (F063-03-48)*.

For additional information on circumstances requiring an *SIR (F063-03-48)*, refer to SSA Administrative P&P [Special Incident Report \(F 13\)](#).

## **Media Inquiries**

Per SSA policy, all requests from the media for any information (e.g., client, staff, agency, etc.) will be referred to the SSA Public Information Officer (PIO). Hotline staff will not respond directly to media inquiries.

All media contacts with any SSA employees will be referred to the SSA PIO per SSA Administrative P&P [External Communications and Media Requests \(D 3\)](#). The Hotline SSW will email the Hotline SSSS OD, Manager, and SSA PIO immediately following the media contact.

For additional information, refer to SSA Administrative P&P [External Communication and Media Requests \(D 3\)](#).

## **Confidentiality**

Per PEN § 11167.5(b), reports of suspected child abuse and neglect (i.e., Screener Narratives) and any associated investigation reports (i.e., Investigation Narratives) are confidential. However, release of these records to certain persons or agencies, excluding the release of the identity or name of the RP, is permitted within specified guidelines.

**Exception:** Per PEN § 11167, cross-reports to CCL may contain the name/identity of the RP. This is permitted, but not required, for a licensing agency when abuse or neglect in out-of-home care is reasonably suspected and/or the licensing agency is investigating the known or suspected case of child abuse or neglect.

Hotline SSWs may provide verbal disclosure of information concerning reports of child abuse and neglect to:

- Agencies receiving or investigating mandated reports of child abuse or neglect (i.e., other county child welfare agencies, law enforcement)
- Coroners and medical examiners when conducting a post mortem examination of a child
- Truancy Court Liaison

Prior to releasing information, the Hotline SSW will verify the requesting party's identification.

Per CFS policy, requests for information concerning child abuse and neglect reports that do not meet the criteria listed above will be transferred to the Child Abuse Hotline Clearance Line.

For additional information and guidelines concerning confidentiality of CFS client records and disclosure of child abuse records, refer to

Attachment 2—Authorized Disclosure of Child Abuse Records in CFS P&P [Confidentiality—CFS Client Records \(F-0105\)](#).

**Sensitive Referrals and Cases**

Staff will process as “sensitive” (Z referrals) all reports that meet the criteria as specified in CFS P&P [Sensitive Referrals and Cases \(F-0107\)](#).

Refer to [Attachment 5—Processing Sensitive Referrals: Suggested Guidelines](#) for assistance with completing Z referrals.

**Reports—Children in Out-of-Home Placement**

Per PEN § 11166.1, reports of abuse or neglect to children in out-of-home placements with a substitute care provider will have a referral created in the CWS/CMS. This includes reports on the following out-of-home placements:

- FFH
- FFA certified home
- Short-Term Residential Therapeutic Placement (STRTP)
- Relative
- Non-Relative Extended Family Member (NREFM)
- Small Family Home

Per CFS policy, to assist in determining program assignment for the referral investigation, the Hotline SSW will search in the “Placement Management Section” in the CWS/CMS to locate the reported child’s current placement. Document the type of placement in the Child Abuse Hotline Screener Narrative.

The Hotline SSW will cross-report referrals and EO/Quality of Care reports involving children in a Resource Home or licensed facility to CCL. This includes:

- FFA homes
- STRTPs
- OCFC
- Small Family Home

The Hotline SSW will cross-report referrals and EO/Quality of Care reports involving children in FFH placements to CFS FC Licensing.

**Note:** A cross-report to CCL or FC Licensing is not required when the report concerns a child placed with a parent, relative, legal guardian, or NREFM.

**Reports—NMDs**

Per WIC § 16504(c), the Hotline will accept reports of NMDs residing in a FFH, FFA, STRTP, Transitional Housing Placement + Foster Care

(THP+FC), or with an approved relative or NREFM, in which the NMD is alleged to be endangered by abuse, neglect, or exploitation by the caregiver or housing provider.

**Note:** If an allegation of abuse or neglect is received regarding a NMD who meets screen-in criteria for investigation by Adult Protective Services (APS), the Hotline SSW will process the report as outlined in CFS P&P [Adult Protective Services \(APS\) Hotline \(A-0209\)](#).

Reports on NMDs will not be entered as a referral into CWS/CMS and will not be assigned for investigation. NMDs are adults and there is no legal requirement to conduct an investigation.

The Hotline SSW will document reports received on NMDs in CWS/CMS per instructions provided in [CWS/CMS Data Entry Standards—Safety Assessment for Non-Minor Dependents \(NMD\) \(L0102\)](#).

Per CFS policy, the Hotline SSW will notify the assigned SSW and SSSS when a NMD Safety Assessment has been created in the NMD's CWS/CMS case.

**Note:** Pursuant to WIC §§ 15633–15633.5, the Hotline SSW will maintain confidentiality regarding a NMD who meets screen-in criteria for APS investigation and will not make any reference to the APS report when completing an entry in the CWS/CMS and providing notifications to the assigned SSW and SSSS.

Per Health and Safety Code (HSC) § 1536.1, the Hotline SSW will cross-report the alleged abuse, neglect, or exploitation of the NMD to the appropriate licensing or approval agency as follows:

- CCL (if the NMD is placed in a FFA home, GH, or THP+FC)
- FC Licensing OD (if the NMD is placed in an FFH)
- Relative Assessment Unit (RAU) (if the NMD is placed with a relative or NREFM)
  - Provide cross report information to RAU via email to the Relative Assessment Unit In-box

As specified in All County Letter (ACL) 11-77, suspected abuse of a NMD by a roommate in a Supervised Independent Living Placement (SILP) will be cross-reported to the appropriate law enforcement agency.

**Note:** The Hotline SSW will create a referral in CWS/CMS for investigation if the information provided indicates there are children

residing in the licensed or approved home with the NMD who have been abused, neglected, or exploited or are at risk of abuse, neglect, or exploitation.

**Youth  
Requesting  
Re-Entry**

Per CFS policy, calls received by the Hotline from former dependents of the Juvenile Court, who request information on re-entering Extended Foster Care (EFC), will be referred to the NMD Re-Entry Liaison or designee. For further information on re-entries, refer to CFS P&P [Re-Entry Into Extended Foster Care \(EFC\) \(J-0105\)](#).

**SSSS Review  
and Approval**

Per CFS policy, the Hotline SSSSs will review referrals to confirm that, as appropriate, the ER Protocol process has been completed, and that the referral disposition is congruent with the information contained in the Screener Narrative and SDM.

Prior to approving or closing a referral, the Hotline SSSS will review documentation in CWS/CMS, and the SDM Hotline Tool for accuracy and thoroughness:

- Confirm that no identifying information about the RP has been disclosed in the Screener Narrative
- Confirm that all required cross-reports (e.g., CCL) and notifications (e.g., assigned SSW, SSSS, Manager) have been completed and documented in the Screener Narrative
- Review required SDM Hotline tool for accuracy and confirm the screen-in and response time decisions are appropriate and congruent based on information contained in the Screener Narrative
- Confirm available supporting documentation (e.g., follow-up written reports, SDM, etc.) is attached with the referral
- Review the Hotline SSW's decision for E/O dispositions
- If the referral is incomplete, requires corrections, or there is a need to modify the report disposition, return the referral to the assigned Hotline SSW for modification. (If the assigned Hotline SSW is unavailable to complete modifications promptly, the SSSS may return the referral to another Hotline SSW to make the necessary corrections)
- Document the date of the review and approval of the SDM Hotline Tool on the Screener Narrative

**Call  
Recording  
System**

Per CFS policy, Hotline staff will utilize a call recording system for quality assurance and monitoring purposes.

**Note:** Callers to the Hotline are advised via a pre-recorded introduction that calls may be monitored or recorded for quality assurance purposes.

Hotline SSWs may utilize the call recording system as needed to review or clarify information provided by a caller in order to accurately reflect the contents of the call as documented on the Screener Narrative.

Child Abuse Hotline SSSSs may utilize the call recording system to:

- Investigate complaints
- Review calls with Hotline SSWs
- Complete monthly and quarterly Child Abuse Hotline call monitoring reviews

**Note:** Per CFS policy, supervisory staff from other CFS programs may listen to Hotline telephone calls via the call recording system for referral or case-related reasons. Hotline SSWs will refer requests for access to the system to a SSSS or to the Manager.

Requests for release of call recording system information from persons or agencies outside of CFS will be submitted through the SSA Custodian of Records as described in Policy section “Release of Child Abuse Records” in CFS P&P [Confidentiality—CFS Client Records \(F-0105\)](#).

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## REFERENCES

### Attachments and CWS/CMS Data Entry Standards

Hyperlinks are provided below to access attachments to this P&P and any CWS/CMS Data Entry Standards that are referenced.

- [Attachment 1—Emergency Response Protocol](#)
- [Attachment 2—Referral Response Options](#)
- [Attachment 3—Mandated Reporter Written Follow-Up: Suggested Guidelines](#)
- [Attachment 4—SCMS Practice Guide for DA Communications](#)
- [Attachment 5—Processing Sensitive Referrals: Suggested Guidelines](#)
- [CWS/CMS Data Entry Standards—Safety Assessment for Non-Minor Dependents \(NMD\) \(L0102\)](#)

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### Hyperlinks

Users accessing this document by computer may create a direct connection to the following references by clicking on them.

- CFS P&P [Adult Protective Services \(APS\) Hotline \(A-0209\)](#)

- CFS P&P [Confidentiality—CFS Client Records \(F-0105\)](#)
- CFS P&P [Re-Entry Into Extended Foster Care \(EFC\) \(J-0105\)](#)
- CFS P&P [Sensitive Referrals and Cases \(F-0107\)](#)
- CFS P&P [Sexual Abuse Allegations—Child Abuse Registry \(CAR\) \(A-0205\)](#)
- CFS P&P [Structured Decision Making \(D-0311\)](#)
- SSA Administrative P&P [External Communications and Media Requests \(D 3\)](#)
- SSA Administrative P&P [Special Incident Report \(F 13\)](#)

**Other Sources** Other printed references include the following:  
None.

## FORMS

**Online Forms** Forms listed below may be printed out and completed, or completed online, and may be accessed by clicking on the link provided.

Form Name	Form Number
<a href="#">Special Incident Report</a>	F063-03-48
<a href="#">Suspected Child Abuse Report</a>	SS 8572

**Hard Copy Forms** Forms listed below must be completed in hard copy (including multi-copy NCR forms). **For reference purposes only**, links are provided to view these hard copy forms, where available.

Form Name	Form Number
None.	

**CWS/CMS Forms** Forms listed below may **only** be obtained in CWS/CMS. **For reference purposes only**, links are provided to view these CWS/CMS forms, where available.

Form Name	Form Number
None.	

**Brochures** Brochures to distribute in conjunction with this procedure include:

None.

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## LEGAL MANDATES

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[Penal Code \(PEN\) Section \(§\) 11164](#) *et seq.*, also known as the Child Abuse and Neglect Reporting Act (CANRA), provides definitions of sexual abuse, sexual assault, sexual exploitation, neglect (including severe neglect and general neglect), willful harming or injuring of a child or the endangering of the person or health of a child, unlawful corporal punishment or injury, and abuse or neglect in out-of-home care; specifies situations that do not meet the definition of child abuse or neglect.

[PEN § 11165.7](#) defines mandated reporters.

[PEN § 11165.9](#) specifies that designated agencies must accept reports of suspected child abuse or neglect offered by mandated and non-mandated reporters, and requires that the designated agency will maintain a record of all reports received.

[PEN § 11166\(a\)](#) describes reporting responsibilities for mandated reporters, including time frames for filing an initial telephone report and subsequent follow-up written report.

[PEN § 11166\(g\)](#) provides that any other person (i.e., non-mandated) with knowledge of or who observes a child whom he or she knows or reasonably suspects has been a victim of child abuse or neglect may report the known or suspected child abuse or neglect; specifies that a mandated reporter who acts in his or her private capacity and not in his or her professional capacity or within the scope of his or her employment falls within the category of “any other person” and not that of a mandated reporter.

[PEN § 11166\(j\)](#) outlines the county welfare department’s responsibility to immediately or as soon as practicably possible cross-report to the appropriate law enforcement agency, the appropriate county welfare agency, and the District Attorney’s (DA’s) office every known or suspected instance of child abuse or neglect.

[PEN § 11166.1](#) mandates a county welfare agency to cross-report to the appropriate licensing agency upon receiving the following types of reports: 1) abuse alleged to have occurred in facilities licensed to care for children by the State Department of Social Services, or 2) child fatalities involving a child who was, at the time of death, living at, enrolled in, or regularly attending a facility licensed to care for children by the State Department of Social Services, unless the circumstances of the child’s death are clearly unrelated to the child’s care at the facility.

[PEN § 11166.2](#) mandates a county welfare agency to cross-report to the appropriate licensing agency every known or suspected instance of child abuse or neglect that occurs while the child is being cared for in a child day care facility, involves a child day

care licensed staff person, or occurs while the child is under the supervision of a community care facility or involves a community care facility licensee or staff person.

[PEN § 11167](#) requires mandated reporters to provide their name, business address, and telephone number when making a child abuse report; specifies all known information that must be included in a child abuse report; provides guidelines for providing information relevant to an incident of child abuse or neglect to a licensing agency investigating a known or suspected case of child abuse or neglect; specifies confidentiality of reporters and provides guidelines for disclosure among agencies receiving or investigating mandated reports; states that non-mandated reporters are not required to provide their names when making a report.

[PEN § 11167.5](#) specifies punishment/fine for violation of confidentiality of child abuse reports and defines persons and agencies to which disclosure is authorized.

[PEN § 11170\(b\)\(2\)](#) requires that mandated reporters be provided with follow-up information after the completion of a child abuse or neglect investigation or after there has been a final disposition in the matter of the report.

[Welfare and Institutions Code \(WIC\) § 830](#) provides for members of a multi-disciplinary team to disclose and exchange confidential case related information with one another when it is for the purpose of the “prevention, identification, management, or treatment of child abuse or neglect.”

[WIC § 15633–15633.5](#) specifies reports of elder or dependent adult abuse will be confidential and provides guidelines for the permissible disclosure of information.

[WIC § 16504\(a\)](#) mandates that any child reported to the county child welfare services department to be endangered by abuse, neglect, or exploitation will be eligible for initial intake and evaluation of risk services; mandates that every county child welfare services department maintain and operate a 24-hour response system; stipulates that consideration be given to providing appropriate social services to maintain children safely in their home; stipulates that an in-person response is not required when an evaluation of risk, which includes collateral contacts, a review of previous referrals, and other relevant information, determines that an in-person response is not appropriate.

[WIC § 16504\(c\)](#) mandates that any non-minor dependent (NMD) reported to the county child welfare services department to be endangered by abuse, neglect, or exploitation by a licensed or approved caregiver while in a foster care placement will be eligible for evaluation of risk services to determine if the placement is safe and appropriate; specifies that a cross-report will be made to the appropriate licensing or approval agency and, as appropriate, to law enforcement.

[WIC § 18951](#) defines “multi-disciplinary personnel” as a team of three or more trained professionals providing services related to child abuse or neglect. It also defines the types of professionals who may be part of a multi-disciplinary team.

[California Department of Social Services \(CDSS\) Manual of Policies and Procedures \(MPP\), Division 31, Chapter 31-101](#) mandates that the county respond to all referrals for service which allege child abuse, neglect, or exploitation; outlines types of responses to referrals (Evaluate Out, Immediate investigation, and 10 calendar day investigation); mandates an in-person investigation of all referrals received from law enforcement unless the referral is a cross-report stating that law enforcement has already conducted an investigation and determined that there is no indication of abuse or neglect by a member of the child's household.

[CDSS MPP, Division 31, Chapter 31-105](#) describes the Emergency Response Protocol used by child welfare services agencies receiving a referral of alleged child abuse or neglect to determine whether an in-person investigation is required; specifies minimum elements that must be obtained in order to determine whether an in-person response is required; provides guidelines for consideration in deciding whether or not an in-person investigation is necessary; provides outcome options (evaluate out with or without a referral to another community agency or accept for in-person investigation); specifies that evaluate out referrals must include the rationale for the evaluate decision and supervisor approval.

[CDSS MPP, Division 31, Chapter 31-110](#) provides guidelines for types of in-person referral responses, including response to reports from law enforcement and for documentation and referral to other community agencies when a determination is made that an in-person response is not necessary.

[CDSS MPP, Division 31, Chapter 31-115](#) provides guidelines for an immediate response to referrals based on the completion of the Emergency Response Protocol that indicates a situation of imminent danger to a child; a report from law enforcement indicating that a child is at immediate risk of abuse, neglect, or exploitation; or the CAR Senior Social Worker's (SSW's) determination that a child referred by law enforcement is at immediate risk of abuse, neglect, or exploitation.

[CDSS MPP, Division 31, Chapter 31-120](#) provides guidelines for a 10 calendar day response to referrals based on the completion of the Emergency Response Protocol that indicates an in-person investigation is appropriate and an immediate investigation is not warranted; or a law enforcement agency making the report does not state that the child is at immediate risk of abuse, neglect, or exploitation and the CAR SSW determines that an immediate investigation is not warranted.

[Health and Safety Code \(HSC\) § 1536.1\(f\)](#) requires notification to the appropriate licensing agency for incidents of abuse, neglect, or exploitation of NMDs in licensed foster care placements by a licensed caregiver, or other incidents that would jeopardize the health or safety of any other residents in the home or facility.

[All County Letter \(ACL\) 05-09](#) and [Errata](#) provides instructions on reporting, assessment, investigation, disposition, documentation and cross-reporting of reports

of suspected child abuse or neglect for children in out-of-home placement, including children placed in the home of a relative or non-relative extended family member (NREFM).

[ACL 11-77](#) addresses a child welfare agency's responsibility to evaluate for an emergency response to an allegation that a NMD is endangered by abuse, neglect, or exploitation by a licensed or approved caregiver in order to determine if the placement is safe and appropriate as stipulated in WIC § 16504(c); specifies that a cross-report be made to the appropriate licensing or approval agency; specifies that suspected abuse of a NMD by a roommate in a Supervised Independent Living Placement (SILP) be cross-reported to local law enforcement.

[ACL 25-38](#) provides guidance related to the requirement that an agency receiving a report of known or suspected child abuse or neglect ask a non-mandated reporter for their name, telephone number, the information that led to the suspicion of child abuse or neglect, and the source or sources of that information. If the non-mandated reporter is unwilling to provide this information, the agency is to make efforts to determine the reasons why the reporter prefers to remain anonymous and advise the reporter that the information will remain confidential.

*Holman vs. County of Butte (2025)* establishes that the county welfare department's duty to cross-report "every known or reasonably suspected instances" of child abuse and neglect is mandatory and not discretionary.

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## REVISION HISTORY

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Since the Effective Date of this P&P, and prior to the Current Revision Date, the following revisions of this P&P were published:

July 29, 2013  
July 9, 2014  
February 5, 2016