PRAESIDIUM

A Review of DFPS Training
Curriculum and Resources

March 20, 2020

Indemnity Statement

Praesidium provides A Review of DFPS Training Curriculum and Resources to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse. This information is not legal advice, either expressed or implied. Consultation with qualified legal counsel is recommended.

When all recommendations are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

Accordingly, PRAESIDIUM MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY, REGARDING THE SUCCESS OR FAILURE OF THE REVIEW OF A DFPS TRAINING CURRICULUM AND RESOURCES IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE.

INTRODUCTION

ABOUT PRAESIDIUM

Since 1991, Praesidium's mission is *"to help you protect those in your care from abuse and to help preserve trust in your organization."* Praesidium works with organizations across the world to prevent the sexual abuse of children and vulnerable adults, to prevent false allegations of abuse against innocent employees and volunteers, and to prevent the loss of reputation and revenue for organizations serving vulnerable populations. For over the past two decades Praesidium has served more than 4,000 clients and offers a full range of risk management and loss control services. Praesidium's clients include higher education institutions, public and private schools, churches, camps, youth development organizations, water parks, long-term care facilities, hospitals, luxury resorts, social service agencies, foster care programs, sports programs, fitness clubs, and childcare centers.

SCOPE OF WORK

By request of Texas Appleseed, Praesidium reviewed a variety of training and resource materials created by the Texas Department of Family Protective Services (DFPS). These trainings materials were developed for child welfare caregivers, providers, and in some instances, DFPS staff to guide understanding of child-to-child sexual abuse prevention.

Praesidium reviewed the following items with focused attention on course development and learner engagement as well as sexual abuse prevention content:

Online Course:

1. Recognizing and Reporting Child Sexual Abuse: A Training for Caregivers (https://www.dfps.state.tx.us/Training/Child_Sexual_Abuse_for_Caregivers/index.html)

Electronic Documents:

2. Child-Sexual-Aggression-Resource-Guide-FINAL.pdf
3. CPS Professional Development Core Competencies Training – Sexual Abuse.docx
4. Categories of Sexual Behavior – Module 1_Storyboard_tg.docx
5. Child with Sexually Aggressive Behavior Entering Conservatorship – Module 2_Storyboard_tg.docx
6. CPS Actions When There is a Residential Child Care Investigation (RCCI) Involving a Child in CPS Conservatorship – Module 3_Storyboard_tg.docx
7. Child Sexual Aggression Discovered in an Investigation of a Kinship Placement – Module 4_Storyboard_tg.docx

This report outlines strengths and areas for improvement towards meeting the goal of equipping caregivers and program administrators with tools for preventing and responding to child-to-child sexualized behavior and abuse.

PRAESIDIUM
Our Passion. Your Protection.

REPORT FINDINGS

Online Course: Recognizing and Reporting Child Sexual Abuse: A Training for Caregivers

A. Course Development and Learner Engagement

This online course was created in 2019 is accessible to any individual through DFPS's designated Training webpage, and it is also mobile accessible. It is available in both English and Spanish. The course is intended to count for one-hour of continuing education credit (per the completion certificate) for caregivers providing foster care services within residential facilities (i.e., foster homes, general residential operations (GRO), and residential treatment facilities (RTC)).

The course is formatted with 42 slides listing narrative paragraphs and written descriptions of child sexual abuse content. Although there is a link to download a copy of the training course in a PDF format located at the ending Summary slide, the online course itself does not have a Table of Contents to reference for navigation purposes. Each slide has a title header indicating overall content, with Previous Page and Next Page buttons located in both top and bottom left and right corners.

According to an online Flesch-Kincaid readability test, the online course reflects an 11th-12th grade readability level, whereas, the average American adult may only read at a 7th-9th grade level. While sexual abuse prevention can be a complex topic to discuss, the content should reflect readability expectations of a larger universal audience, particularly as caregivers will have varying educational backgrounds.

There is a Skip to Content hyperlink in the top right corner of the webpage that does not noticeably change or do anything when clicked. On a mobile device, the Skip to Content link is not present within the training course. Very few graphics and visual cues are utilized, and learner interactivity is not incorporated into the slides. Additionally, the course does not utilize any audio narration or audio cues.

The course does include links to different reference materials, such as downloadable PDFs for a Sexual Behavior Chart and Reporting Basics as well as hyperlinks to relevant Texas Family or Penal Codes; however, when a link is clicked, rather than opening a new browser window or tab for review, the currently opened browser window to the training course itself is forced over to the reference material. As a result, the learner may unknowingly close that tab and consequently lose their progress within the course as it is closed out entirely. A learner could press the browser window's back arrow button to regain place within the training course but there are no prompts to direct the learner to do so.

Learners have the ability to click Next Page continuously throughout the course's numerous slides until they reach the ending Knowledge Check questions. Depending on the speed of one's clicks, a learner could speed through the entire course content in a least 15 seconds. Upon additional completion of the nine Knowledge Check questions, a learner could feasibly complete the course and receive a certificate in less than 10 minutes, undermining the intended course allocation of one hour's worth of continuing education.

Additionally, each Knowledge Check question forces learners to answer correctly before moving on to the next question, so it does not evaluate learner competency and understanding of the material. These nine questions range in basic comprehension type from true/false and multiple choice with some questions having two to four possible answers to choose. For questions in which there are two possible answers, such as true/false, when a learner selects one choice and checks their answer, they may receive feedback that it is "Incorrect! Please try again." Therefore, the learner can quickly click the alternative remaining choice without critical thought to its relevance to the question. There is only one narrative-based question that provides a case example for the learner to identify the appropriate caregiver's response.

Also, the Knowledge Check questions remain the exact same questions in the exact same order regardless of the number of times in which a learner may access or complete the course. Therefore, learners who have taken the course more than once may reflect on memory rather than competency to complete the Knowledge Check in future attempts.

2

PRAESIDIUM
Our Passion. Your Protection.

Once learners complete the Knowledge Check questions, they may enter their name into a field and print a certificate, which states: "Texas DFPS is hereby granted to [NAME] to certify that he/she has completed the one-hour "Recognizing and Reporting Child Sexual Abuse Training for Caregivers" on [DATE MM/DD/YYYY]." The learner is then responsible for printing and saving their completion certificate.

As the course does not request for any additional contact information, such as the learner's email address or respective agency or organization affiliation, there are likely few analytics DFPS can pull to identify trends for course consumption and utilization.

Praesidium provides the following recommendations for strengthening DFPS online course development and learner engagement:

1. Create a Table of Contents menu that can be accessed at any time within the course to facilitate direct access to slide content for review.
2. Evaluate opportunities to improve readability level (such as, shorter sentences, bulleted lists, condensed text) to reflect comprehension and accessibility for wider audience.
3. Remove Skip to Content button on webpage.
4. Utilize animations in slides to catch learner's attention and provide variation for moving throughout course.
5. Utilize more imagery and visuals, such as infographics, tables, bullet point lists, to assist with content delivery, rather than lengthy narrative paragraphs.
6. Incorporate interactive learning activities throughout course, such as clicking to open items for additional content to review, drag and drop content into correct sequence or matching, or completing short-answer questions.
7. Incorporate use of audio narration to provide additional learner accessibility to the course and variation to learning styles.
8. Create a Resources or Reference Material menu for learners to access all downloadable and hyperlinked materials in one centralized place.
9. Open linked reference materials in a new browser window or separate tab to not disturb progress within current browser window of online course.
10. Prevent learner from clicking-through the course without reading and interacting with content by disabling "Next Page" button until learner has met certain conditions, such as a designated timeline for the slide or completed interactivity.
11. Revise Knowledge Check to be a pass/fail test, rather than a forced pass, to better hold learner accountable to understanding course content by requiring a pass for course completion.
12. Revise Knowledge Check to include additional applied learning and scenario-based questions to better evaluate learner competency and application of content.
13. Create a question bank that randomly selects a defined number of questions for each individual's Knowledge Check so the learning experience will be slightly different for each learner each time.
14. Request additional contact information about learner at beginning of course access, such as email address, title/position, agency or organization affiliation, to allow DFPS to identify trends and internal records for course utilization and completion.
15. Consider adding list of course objectives to the completion certificate to demonstrate overall training content that was reviewed.

B. Sexual Abuse Prevention Content

As indicated by the title of the course, the DFPS Caregiver course primarily focuses on the signs and symptoms of child sexual abuse and necessary reporting procedures rather than preventive and safeguarding measures for keeping children safe while in care.

The course introduces definitions and key terms on child sexual abuse, including nonconsensual and consensual sexual activity. However, the course incorrectly defines consensual sexual activity as "sexual activity with consent between an adult and a child," although, a child (anyone under 18 years of age) cannot

give consent to sexual interactions with an adult. It further incorrectly defines that consensual sexual activity may occur "between children with more than 24 months difference in age or when there is a significant difference in their developmental levels," however, this is opposite to an understanding of normal sexual development that may occur between peers of the same age.

The course heavily emphasizes that the most commonly reported cases of sexual abuse involve incest or abuse by family members. While biological, adoptive, and blended families may pose risk for perpetrating against a child, caregivers need to be aware that child sexual abuse is more often perpetrated by another adult figure in the child's life that they love, trust, or respect, including figureheads like a teacher, coach, pastor, tutor, neighbor, or a peer's parent. Additionally, caregivers should understand that sexual abuse can occur between and among children in care as well.

The course includes several slides itemizing sexual slang words children may use to describe body parts and genitalia or sexualized behavior. However, the course does not encourage or empower caregivers to teach and utilize anatomically correct terms, so children have shared language to use in promoting positive body autonomy and caregiver-child communication.

The course outlines five phases of sexual abuse: engagement, sexual interaction, secrecy, disclosure, and suppression. While these phases introduce important content on how adult offenders may groom children, it presents the information in a clinical, regimented format by ascribing these behaviors to specific phases. Caregivers should be equipped with knowledge of how adult offenders operate (utilizing access, privacy, and control) but it is not necessary for them to identify or think through sexual abuse as specific phases. Particularly, when certain phases may not occur, such as the disclosure phase. It is more important for caregivers to understand examples of grooming behaviors and how they may manifest as well as potential barriers that may exist in either children or adults reporting about incidents of inappropriate behavior or sexual abuse.

Child-to-child sexual abuse is not introduced to the learner until midway through the course. It is then defined into three categories: normal sexual development, sexual behavior problems, and sexually aggressive behavior. The course relies heavily on the caregiver to utilize a downloadable Sexual Behavior Chart for making determinations as to which category of behaviors applies based on the child's age range.

The course outlines that sexually aggressive behavior must include at least one of the following components: power differentials, seduction, coercion, or force. It further provides one case study example in which Child A, a 16 year old boy, admits to performing oral sex and anal penetration on Child B, his 5 year old sibling. Based upon additional case factors and reference to the Sexual Behavior Chart, the course identifies this as sexually aggressive behavior. The course does not include any further examples or opportunities for the caregiver to consider whether certain behaviors are appropriate, problematic, or aggressive.

Additionally, the course does not discuss how to prevent or manage sexual activity between children, nor does it identify high-risk circumstances or activities in which children may need to be more carefully monitored or supervised. Although the course provides clear steps for reporting incidents of sexual abuse to the Texas Abuse Hotline by either phone or website, it does not clearly articulate the necessity to report sexual behavior problems or sexually aggressive behaviors. That referenced language in the course is not duplicated in the Reporting Sexual Abuse section which may disrupt associated comprehension of the material.

As caregivers may include licensed foster parents to employed shift workers it is important to equip and educate all adults on their role that prioritizes abuse prevention and provides a safe environment to children in care.

Praesidium provides the following recommendations for strengthening DFPS online course content on sexual abuse prevention and child-to-child sexual abuse:

1. Remove definition of "consensual sexual activity" and reframe instead as normal sexual development that may occur between peers of similar age.

4

PRAESIDIUM
Our Passion. Your Protection.

2. Expand definition and discussion of adult grooming behaviors to include:
    a. The testing and manipulation of a child's physical, psychological, emotional, and behavioral boundaries, with examples for each type of boundary
    b. Grooming behaviors may occur over an extended period of time or may happen rather quickly
    c. Members of the community can also be groomed to ignore or minimize concerning or inappropriate behaviors between an adult and child and may lead to barriers in reporting
    d. How caregivers should respond to and share concerns of grooming behaviors with their caseworker, supervisor, or abuse hotline
3. Revise Sexual Behavior Chart in the following areas:
    a. Under 7-12 (school aged), remove "sexual penetration" and "oral sex" from under Sexual Behavior Problem.
    b. Under 13-17 (teens), remove "sexual contact with animals" from under Sexual Behavior Problems to Sexually Aggressive Behaviors.
    c. Add explanation that both sexual behavior problems and sexually aggressive behaviors may require safety planning and/or therapeutic interventions as well as appropriate documentation of behaviors
4. Revise the Reporting Sexual Abuse section to include clear guidance as to whether and to what extent sexual behavior problems and/or sexually aggressive behaviors should be reported by caregivers to the abuse hotline and shared with CPS caseworkers.
5. Revise content to include focused attention on preventive measures for maintain safety within a child welfare or foster care environment, such as:
    a. The caregiver's role and responsibility in monitoring and supervising children in care, particularly discussing strategies for identifying and supporting those who may be at higher risk to sexually act out and those who may be at higher risk to be abused by peers.
    b. Importance of teaching and utilizing anatomically correct terms with children
    c. Identification of red-flag and potential grooming behaviors an adult may exhibit that may require further exploration and notification to CPS
    d. Identification of high-risk circumstances or activities between children that increase risk for sexual activity and how to proactively manage and supervise those activities
    e. How to respond if and when sexual activity between children occurs
    f. Interventions and strategies for implementing safety plans for children who exhibit sexually acting out behaviors or experience child-to-child sexual abuse (either as aggressor or victim)
    g. Strategies caregivers can utilize to help prevent false allegations against themselves for inappropriate conduct or behavior with children in care
6. Incorporate content from the Child Sexual Aggression Resource Guide's "Immediate Intervention and Response" section (pages 20-25) into the online course.

Electronic Documents

A. Child Sexual Aggression Resource Guide

The Child Sexual Aggression Resource Guide was created in May 2019 to provide program administrators guidance on identifying whether a child presents with appropriate developmental behavior or sexual aggressive behavior. This 28-page PDF document includes a Table of Contents and various sections outlining: the identification and assessment of sexually aggressive behavior; pertinent definitions and terms; Child Protective Services (CPS), Residential Childcare Licensing (RCCL), and child welfare position-based protocols for responding to, investigating, and documenting circumstances in which children in care present, or are victimized by, sexually aggressive behavior; and, interventions and treatment goals for children with sexually aggressive behavior.

PRAESIDIUM
Our Passion. Your Protection.

Based on the provided document alone, Praesidium is not aware as to when and how the Resource Guide is administered or reviewed by the intended target audience; however, a DFPS website mentions (per related policy 6241.11) that "staff members of CPS and of SSCCs providing case management services" shall follow the procedures outlined in the guide.

The Resource Guide mirrors some content presented in the online DFPS Caregiver course, such as the Sexual Behavior Chart and dynamics of a child with sexual aggression. But, it also outlines more specific guidance as to what information program administrators should utilize to determine whether a child's behavior meets the definition of sexually aggressive behavior, such as, age and developmental delays of involved children, date and location of the incident, description of the incident, previously documented history of sexual aggressive behavior, and any child advocacy center forensic interviews of the child in question or alleged child victims.

The Resource Guide primarily provides reporting and documentation protocols for reacting to the following circumstances: the occurrence of child sexual aggression when a child, either aggressor or victim, is entering CPS Conservatorship; the occurrence of child sexual aggression identified in a RCCI of a contracted placement, and the occurrence of child sexual aggression identified in a kinship placement.

One of the strongest aspects of the Resource Guide is the Immediate Intervention and Response section which outlines treatment goals and opportunities to manage sexual aggressive behavior in children, how caregivers and adults can respond to children with sexually aggressive behavior, specific house rules and conversations for caregivers and youth to have in service planning, and questions caregivers might be asked to identify context around sexual behaviors in children.

Praesidium provides the following recommendation for strengthening the Child Sexual Aggression Resource Guide on sexual abuse prevention and child-to-child sexual abuse (in addition to applicable recommendations made above for the DFPS Caregiver course):

1. Consider creating revised Child Sexual Aggression Resource Guides for different target audiences (i.e., DFPS caseworkers, foster care program administrators, direct care staff/caregivers) that provide more relevant role or position-specific information and protocols on preventing, managing, and responding to child-to-child sexual abuse.

B. CPS Professional Development Core Competencies Training – Sexual Abuse

Praesidium was provided a copy of the CPS Professional Development Core Competencies Training Week 1 Day 2 Instructor Guide, last revised in November 2018. Per Texas Appleseed, this training is a part of the standard pre-service training for CPS caseworkers. The instructor guide includes five timed activities totaling to a two-hour training session.

The first section facilitates a Sexual Abuse Desensitization Activity, in which participants must right as many sexual slang words as possible within 90 seconds. This activity is used to prepare caseworkers to hear terminology that might be used in the field by children to describe their body parts and genitalia. Participants are provided a handout which lists several examples of sexual slang words (duplicate of lists shared on three slides in online DFPS Caregiver course). While it is important for caseworkers to overcome feelings of discomfort or embarrassment when discussing sexual abuse, this section does not emphasize the more important aspect of ensuring caseworkers pick up on potential vague disclosures and non-anatomically correct language that children may use when interacting with a caseworker. It also does not educate or reinforce what caseworkers should do upon hearing a child use these sexual slang words in the field, such as asking for clarification or additional information.

The second section discusses Indicators of Sexual Abuse: Defining What It Is, which includes watching a DVD video clip on sexual abuse. Praesidium was not provided the DVD to evaluate content. The instructor guide does include a statistic of child sexual abuse and examples of child sexual abuse, primarily examples

6

PRAESIDIUM
Our Passion. Your Protection.

of an adult perpetrating against a child. This section does not include discussion of child-to-child sexual abuse or sexual aggressive behaviors. This section ends with a review of statutory definitions of sexual abuse, and its location within the CPS Handbook's sub-sections.

The third section facilitates a Myth vs. Fact Activity, in which participants are provided 14 statements and must decide if each statement is a myth or fact about sexual abuse. These statements include information on gender dynamics among offenders as well as victims, barriers to reporting and prosecuting sexual abuse, impact of alcohol or substance use for offenders as well as victims, and prevalence of false allegations (mirrored content from the online DFPS Caregiver course). It does not include myths or facts about child-to-child sexual abuse or sexual aggression. After participants decide whether the statement is a myth or fact, the instructor facilities a discussion as to why certain individuals believe it to be a fact and why others believe it to be a myth. The instructor then provides the correct answer and some explanation as to why it is a myth or fact. Some of these explanations provide statistics whereas as some provide a single sentence response. This activity ends with a video clip from Truth, Lies, and Sex Offenders. Praesidium was not provided the DVD to evaluate content; however, the instructor guide describes the video as an opportunity to hear from sex offenders about their actions and grooming behaviors. While the instructor is intended to ask some follow-up questions after the video (ex. What stood out to everyone while watching the video?), it does not seem as if much time is spent debriefing or discussing specific grooming behaviors or how these grooming behaviors may specifically be exhibited in the child welfare field. There are missed opportunities for contextualizing offender grooming behaviors within the environment in which caseworkers will be visiting and observing families and placements.

The fourth section includes Reviewing a Sexual Abuse Case on IMPACT 2.0 and Activity Debrief. Participants are asked to review two sexual abuse cases within electronic case documentation to become accustomed to navigating through the IMPACT system. As outlined in the instructor guide, one case example is dated from 2008 and discusses a father sexually abusing his daughter; the second case example is dated from 2007 and discusses a stepfather sexually abusing his stepdaughter. Participants are provided a handout to answer questions about the second case example, but these questions require a recall of knowledge presented in the case, as opposed to questions that assess comprehension or application of skills and knowledge.

The last section is a brief wrap up discussion in which any questions or concerns from the information covered in the day's training session could be addressed.

Based off the provided document alone, it is unclear what specific core competencies participants are to have gained in understanding child sexual abuse from this training session. It seems to provide a basic introduction into child sexual abuse, offender grooming behaviors, and how to navigate the IMPACT system to find pertinent case information. But, it does not seem sufficient to prepare caseworkers for assessing circumstances when children may be at higher risk for sexual abuse, what types of questions can help them assess a child's safety within the placement, warning signs or concerning behaviors or observations to pay attention to in the field, or how to address child-to-child sexualized behaviors or sexual aggression.

Praesidium provides the following recommendations for strengthening DFPS core competencies training on sexual abuse prevention and child-to-child sexual abuse:

1. Identify specific core competencies caseworkers should demonstrate in understanding child sexual abuse and administer an evaluation or assessment against those identified competencies for each caseworker prior to them working alone in the field.
2. Ensure prevention and recognition of child-to-child sexual abuse is included within overall discussion of child sexual abuse.
3. Ensure core competencies include guidance as to what caseworkers should do when they hear sexual slang words within vague or explicit disclosures from children.

7

PRAESIDIUM

Our Passion. Your Protection.

4. Ensure core competencies include discussion on essential questions to ask children during placement visits to determine whether anyone in the child's life (adult or child) is trying to engage them in unsafe or grooming behavior.
5. Update case examples to include a variety of instances in which child sexual abuse may occur in the field, including child-to-child sexual aggression.
6. Ensure instructors facilitating the core competencies training have been appropriate trained and equipped to manage questions and comments from caseworker participants.
7. Further flesh out the instructor guide to provide more consistent descriptions and information on child sexual abuse within the child welfare system.

C. DFPS Modules 1-4 Storyboards

Praesidium was provided four Word documents that storyboard online DFPS modules that Texas Appleseed indicated are completed by CPS caseworkers, investigators, supervisors, and program directors. The investigators and CPS supervisors and program directors who complete these four online modules are tasked with making decisions as to whether a child's behavior constitutes child-to-child sexual abuse or sexual aggression.

The first module reviews Categories of Sexual Behavior, primarily utilizing the Sexual Behavior Chart referenced in the DFPS Caregiver course and Child Sexual Aggression Resource Guide, that distinguishes between normal sexual development, sexual behavior problems, and sexually aggressive behaviors for various age groups. The module utilizes the same case example (Child A inappropriately touching Child B) that is referenced in the online DFPS Caregiver course with generic stock photos of a teenage boy and young girl.

The second module reviews steps for documenting the occurrence of child sexual aggression when a child, either aggressor or victim, is entering CPS Conservatorship. This module mirrors the same protocols outlined in the Child Sexual Aggression Resource Guide with stock photo imagery. It also includes the same case example (Child A inappropriately touching Child B) that is referenced in the online DFPS Caregiver course and Module 1.

The third module reviews steps for documenting the occurrence of child sexual aggression identified in a RCCI, and the fourth module reviews steps for documenting the occurrence of child sexual aggression identified in a kinship placement. Both modules mirror the same protocols outlined in the Child Sexual Aggression Resource Guide with stock photo imagery and process mapping.

Though only reviewed in Word document format, it does not appear that any of the four online modules include interactivity for the learner. Additionally, all four modules mention the need to complete a Knowledge Assessment within the DFPS Learning Station, but Praesidium was not provided these assessments to review possible learner comprehension or application of the training material.

Based off the storyboard materials alone, these training modules may not be sufficient for appropriately preparing investigators, CPS supervisors, or program directors to prevent or respond to child-to-child sexualized behaviors. While the Sexual Behavior Chart is a helpful reference tool, these modules do not specifically guide the learner through complex case studies to test a learner's awareness and understanding of sexualized behavior among children to then help these individuals make real-time, informative responses for ensuring ongoing safety.

Praesidium provides the following recommendation for strengthening DFPS online modules on sexual abuse prevention and child-to-child sexual abuse (in addition to applicable recommendations made above for the DFPS Caregiver course and Child Sexual Aggression Resource Guide):

PRAESIDIUM
Our Passion. Your Protection.

1. Utilize several case examples of child-to-child sexual interactions in every module to allow learner to continuously think through multiple scenarios and dynamics for determining whether the behavior is normal development, problematic, or sexually aggressive.

PRAESIDIUM

Our Passion. Your Protection.