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Case Study: Missouri's Efforts To Protect Children Missing From Foster Care

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Why OIG Did This Review

On any given day, thousands of children nationwide are missing from their foster care placements. Children who go missing from foster care often experience adverse outcomes. In 2019, 978 children went missing at some point from foster care in Missouri. That August, OIG agents joined the Department of Justice and local law enforcement in Missouri metropolitan areas to locate children who were missing from foster care. OIG agents shared concerns that prompted this evaluation. The Administration for Children and Families (ACF) provides Federal funding and oversight to States and eligible Tribes to support foster care programs.

How OIG Did This Review

To follow up on OIG agents' concerns, we evaluated whether the Missouri foster care agency followed applicable Federal and State laws, policies, and procedures to protect the 59 children whose cases we included in our review. We determined whether Missouri provided these children with required services before and after their episodes of being missing, and whether the State followed requirements when the children went missing. Additionally, we evaluated whether children were identified as having any characteristics commonly associated with a higher risk of going missing from care. This case study is not projectable to the entire population of children who went missing; however, it uses insights gained from OIG involvement in the joint law enforcement task force that point to high-risk areas for further review.

Case Study: Missouri's Efforts To Protect Children Missing From Foster Care

Key Takeaway

In the cases we reviewed in detail, the Missouri foster care agency rarely attempted to reduce children's risk of going missing. Additionally, it failed to protect children who went missing from foster care and did not effectively use resources to assist in locating them. As a result, these children were exposed to additional risks associated with being missing from care, such as a heightened risk for sex trafficking and poorer outcomes related to health, safety, education, and involvement in the criminal justice system.

What OIG Found

Though the Missouri foster care agency (Missouri) is not required to do so, we note that it does not have policies for identifying children who may be at heightened risk of going missing or interventions to reduce their risk. In the 59 cases we reviewed in detail, Missouri rarely demonstrated attempts to reduce children's risk of going missing. The majority of the children who went missing (49 of the 59 children) had risk factors associated with a higher risk of going missing. Missouri rarely provided these children with services to reduce their risk of going missing from care—only 7 of the 49 case files indicated that children received such services.

During the times in which the children were missing from care, Missouri frequently failed to comply with

requirements that could have aided in locating them. Nearly half of the case files contained no evidence of Missouri reporting the children as missing, as required, to either local law enforcement or the National Center for Missing and Exploited Children. Additionally, for many missing children, there was no evidence that Missouri made the required notifications and contacts to seek information on the children's potential whereabouts.

For one in three of the children whose cases we reviewed, there was no documentation that the child received any required health and safety checks following the child's return to foster care. For these children, there was no evidence that their case managers assessed their safety, determined their experiences while missing, or determined whether they fell victim to sex trafficking while they were missing from care.

In our conversations with Missouri officials, we learned that Missouri cannot rely on its case management system to accurately identify children who are missing from foster care without reviewing individual case files. The current system alone cannot distinguish between children who are missing from their placement and those who are in an unapproved, but known, placement.

What OIG Recommends

To better protect children from the risks associated with being missing from foster care, we recommend that Missouri (1) develop policies to help identify (a) children who have a heightened risk of going missing from care and (b) interventions that could reduce their risk; (2) implement a monitoring mechanism to ensure that case managers comply with requirements and document their compliance when children are identified as missing and when they are located or return to care; and (3) implement improvements to the case management system to enable accurate identification of children who are missing from foster care.

Thousands of children are missing from foster care systems across the Nation, and—given the critical role States must play in protecting these children—States need additional support and guidance from the national level. Therefore, we recommend that ACF (1) develop a forum for States to share experiences and best practices related to reducing children’s risk for going missing from foster care, locating missing children, and addressing their needs after they return to care; and (2) support Missouri as it works to reduce children’s risk for going missing from foster care and improve compliance with Federal and State requirements related to children who go missing.

Missouri did not explicitly concur or nonconcur with our three recommendations to its agency, but it did note actions it has taken in response to our recommendations and agreed to take additional responsive actions. ACF concurred with our two recommendations to its agency.

TABLE OF CONTENTS

BACKGROUND	1
Methodology	6
FINDINGS	8
Missouri does not have policies to identify children who may be at heightened risk of going missing or interventions to reduce their risk	8
Frequently there was no evidence that Missouri took the required actions to locate children who were missing from foster care	9
One in three children whose cases we reviewed did not have evidence in their case files of receiving any required health and safety checks following their return to foster care	11
Missouri’s case management system does not accurately identify children who are missing from foster care	13
CONCLUSION AND RECOMMENDATIONS	14
Recommendations to the Missouri foster care agency:	
Develop policies to help identify (a) children who have a heightened risk of going missing from care and (b) interventions that could reduce their risk	14
Implement a monitoring mechanism to ensure that case managers comply with requirements and document their compliance when children are identified as missing and when they are located or return to care	15
Implement improvements to the case management system to enable accurate identification of children who are missing from care	15
Recommendations to the Administration for Children and Families:	
Develop a forum for States to share experiences and best practices related to the following: reducing children’s risk for going missing from foster care, locating missing children, and addressing their needs after they return to care	16
Support Missouri as it works to reduce children’s risk for going missing from foster care and to improve compliance with Federal and State requirements related to children who go missing	16
STATE AND AGENCY COMMENTS AND OIG RESPONSE	17
DETAILED METHODOLOGY	19
APPENDICES	21
A. Missouri Department of Social Services Comments	21
B. Administration for Children and Families Comments	23

ACKNOWLEDGMENTS AND CONTACT	25
ABOUT THE OFFICE OF INSPECTOR GENERAL	26
ENDNOTES	27

BACKGROUND

Objectives

To follow up on OIG's work to locate missing children, by determining the extent to which—in a limited number of case studies—the Missouri foster care agency:

1. followed Federal and State requirements to develop a visitation plan, aid in locating the missing children, and conduct health and safety checks for children following their return to care; and
 2. provided services after the children's return to care that may address their trauma and/or reduce the risk of that these children may go missing again.
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On any given day, thousands of children are missing from their foster care placements. In 2019, 978 children were missing at some point from Missouri foster care. That August, OIG—along with the Department of Justice (DOJ) and local law enforcement—targeted Missouri metropolitan areas to locate children who were missing from foster care. During the operation, 23 children missing from Missouri foster care were successfully located. OIG agents involved in that operation shared concerns that prompted this evaluation. Similar operations have been carried out in other States; Missouri was the most recent operation at the start of this evaluation. We will continue to review the results of ongoing and future operations and consider whether additional evaluations are warranted.

Children may go missing from foster care for many reasons. One of the primary reasons for which children may go missing from foster care is to gain access to friends, romantic partners, and families of origin.¹ Children may also choose to leave their placements to escape restrictive rules; caregivers or other youth; bullying; boredom; or isolation.² Additionally, they may be coerced or enticed to leave to gain access to drugs, alcohol, or sex.³ Research and literature use both the terms “missing” and “runaway” to describe children who are absent from their foster care placements. For this report, we refer to all children who are missing, have run away, or are otherwise absent as “missing.”

Published research shows that children who go missing from foster care often experience adverse outcomes.⁴ After going missing from foster care, children have a heightened risk of sexual exploitation and being victimized by sex trafficking, as well as poorer outcomes related to health, safety, education, and subsequent involvement in the criminal justice system.⁵

ACF funding and guidance for State foster care programs

Under Title IV-B of the Social Security Act (the Act), the Administration for Children and Families (ACF) provides Federal funding to States and eligible Tribes (which we refer to collectively as States) to support child and family welfare, including programs that provide care and services for children in foster care.⁶ Additionally, ACF administers the Federal foster care program under Title IV-E of the Act, which provides funding to States for the board and care of certain children in foster care who meet eligibility requirements. To receive Federal funding, States must submit to ACF a Child and Family Services Plan every 5 years with Annual Progress and Services Reports, and a Title IV-E Plan as necessary to reflect new Federal requirements or changes within the State.⁷ Child and Family Services Plans and Title IV-E Plans document the official policies and procedures that each State agency will follow to fulfill the funding requirements of the respective programs. ACF reviews and approves Child and Family Services Plans and Title IV-E Plans.

ACF provides technical assistance and guidance to States.⁸ In the guidance that it issued to States in 2014, ACF details characteristics of children who go missing from foster care, based on State-submitted case-level data and broader research.⁹ In other guidance and reports, ACF suggests targeting prevention efforts towards children with multiple foster care placements and those placed in residential care facilities, as they have a higher risk of going missing from care.^{10, 11} ACF cites that when children are placed in residential care facilities, creating a more family-like environment with personalized staff attention may help to reduce the higher rates of children's going missing from residential care. ACF recommends providing appropriate care that is trauma-informed, culturally appropriate, and individualized to address physical and mental health needs of all children in foster care.^{12, 13} Additionally, ACF recommends that foster care agencies work with the Runaway and Homeless Youth Program—a program administered by ACF—to develop coordinated strategies for providing effective services to children who have gone missing from foster care placements.¹⁴

ACF identified characteristics and factors associated with an increased risk of going missing from foster care

In August 2019, ACF issued a report to Congress that summarized research on characteristics associated with an increased risk of going missing from foster care.¹⁵ The report highlighted that a history of multiple foster care placements increases a child's likelihood of going missing from care. Specifically, one study that the report cited found that a history of going missing from foster care is consistently associated with increased risk of going missing again—children who had gone missing at least once were 92 percent more likely to going missing again than children who had never gone missing.¹⁶ Another cited study found that with every additional foster care placement, children experienced a nearly 70-percent increase in risk of going missing.¹⁷ Children who went missing from care had experienced an average of

six prior placements, compared to three prior placements for children who were not missing from care.¹⁸

Research has also shown that the setting of a child's placement can be a risk factor for going missing from care.¹⁹ A large longitudinal study found that children in group and residential care were more than twice as likely, and those in emergency shelter settings were more than nine times as likely, to go missing compared to children placed with a relative.²⁰

The 2019 ACF report to Congress also emphasized the importance of relationships with caring adults, as they can be an especially valuable protective factor for children in foster care.²¹ Further, ACF asserted that strengthening relationships with caring adults is one way in which State agencies can attempt to reduce children's risk of going missing from foster care.²²

Federal requirements related to children missing from foster care

In 2014, Congress passed the Preventing Sex Trafficking and Strengthening Families Act (Strengthening Families Act), which amended the Act to require that as a condition of receiving Federal foster care funding, States must implement protocols for locating any child missing from foster care.²³ State agencies must report information on missing or abducted children immediately—and in no case later than 24 hours after receipt—to law enforcement authorities, so that those authorities can enter that information into the databases of the National Crime Information Center and to the National Center for Missing and Exploited Children.^{24, 25} Additionally, States are required to develop policies and procedures to identify, document, and determine services for children in foster care who are, or are at risk of becoming, victims of sex trafficking.²⁶

Missouri foster care agency policies related to children missing from care

In each Title IV-E State Plan, the State must designate a State agency to administer its foster care program.²⁷ In Missouri, the Department of Social Services' Children's Division (hereinafter referred to as Missouri) is designated to administer child welfare services, including foster care. The Missouri *Child Welfare Manual* documents the policies and procedures of the foster care program.²⁸

Before children go missing

The Missouri policy that requires visitation plans for all children in foster care is particularly important, because visitation with their families can potentially reduce children's risk of going missing from care. This policy aligns with ACF's emphasis on the importance of relationships with caring adults. Missouri policy recommends that

visits between parents, children, and siblings should occur weekly, or as frequently as possible, with a minimum of one time per month.²⁹ Missouri policy states that case managers must develop visitation plans.³⁰ For children in foster care, visitation with their families is meant to “enhance and increase the bond between the parent, child, and siblings.”³¹ No other policies are explicitly intended to reduce children’s risk of going missing from foster care.

When children go missing

As required by the Strengthening Families Act, Missouri implemented policies for locating any child missing from foster care.^{32, 33} According to Missouri policy, children in foster care are considered to be missing as soon as their physical whereabouts are unknown to the Missouri foster care agency.³⁴ The case manager should file a “missing child report” with local law enforcement within the first 24 hours after a child is determined to be missing, as required by both State policy and Federal law.³⁵ Within that same timeframe, the case manager should report the child as missing to the National Center for Missing and Exploited Children. Additionally, Missouri policy states that the case manager should notify several other individuals that the child is missing, including the juvenile officer, court representative, and child’s parent(s).³⁶ Missouri policy instructs the case manager to contact the child’s family members, friends, counselors, school faculty, or others who may have information about the child’s whereabouts.³⁷ The policy states that the case manager should continue to make these contacts a minimum of once per month until the child is located, and that the case manager should record all contact or attempted contact in the case file.

When children return to foster care

Missouri has policies to direct case managers’ actions when children return to foster care after going missing.³⁸ When a child returns or is located, the case manager should immediately assess the child’s safety. Upon the child’s return to care, the case manager should arrange for a medical examination within 24 hours. Additionally, the case manager should schedule a meeting of the child’s Family Support Team within 72 hours of the child’s return. This team is composed of numerous people involved in the care of the child, including the child’s parents, foster parents, legal guardian, juvenile officer, guardian ad litem, court-appointed special advocate, and others.³⁹ The purpose of a Family Support Team meeting after the child returns to care is to assess concerns such as the child’s safety, foster care placement, and preventing future episodes of the child going missing.

As required by Federal law and Missouri policy, the case managers must interview children once the children are located or returned to care to determine the factors that led to the children’s absences and their experiences while missing.⁴⁰ Missouri policy states that in the child’s subsequent placements, case managers should address—to the greatest extent possible—the factors that led to the child’s absence. Further, the case manager should determine the child’s experiences while absent from care, including whether the child became a victim of sex trafficking.⁴¹ Missouri policy

states that it may be appropriate for the case manager to make a referral to a child advocacy center for a forensic interview, especially for children who have frequently gone missing, even if the child made no disclosure or provided no information about involvement in trafficking.⁴²

Case management system

Federal law requires States, including Missouri, to report certain foster care case-level information to ACF.⁴³ Examples of data reported include demographic information on the child, the number of times a child has been removed from their home, and the current placement setting. The Missouri case management system uses the label “RUN” to track when children are missing from their assigned placement.

Related Work

OIG has participated in multiple operations to locate missing children, including children missing from foster care. OIG joined DOJ and local law enforcement for an operation in Kansas in November 2018.⁴⁴ (In such joint operations, OIG, DOJ, and local law enforcement are collectively known as the “task force.”) The task force for this operation identified and located children missing from foster care, including those at high risk for human trafficking. The task force successfully located 18 children. In June 2021, OIG joined the Department of Homeland Security and local law enforcement for an operation to rescue victims of human trafficking and sexual exploitation in Wichita, Kansas; Independence, Missouri; and Kansas City, Missouri.⁴⁵ This operation resulted in the rescue of 31 victims of trafficking and exploitation. Of those rescued, 14 were children who had been missing from foster care, and the youngest of these children was 4 years old.

Additionally, OIG has conducted previous work evaluating the health and safety of children in foster care. In March 2021, OIG found that some States lack oversight systems to ensure that every child victim has a court representative, and found that some States have challenges that impede their ability to appoint a representative to every child victim.⁴⁶ In 2020, OIG found that—contrary to Federal laws and regulations—Kansas did not ensure that all foster care group homes complied with State licensing requirements related to the health and safety of children in those homes.⁴⁷ In 2018, OIG found that in five States, one in three children in foster care who were treated with psychotropic medications did not receive treatment planning or medication monitoring as required by States.⁴⁸ In 2015, OIG found that in four States, nearly a third of children in foster care who were enrolled in Medicaid did not receive at least one required health screening.⁴⁹

OIG has begun work to evaluate—in selected States—the extent to which children in foster care are screened to determine whether the children are, or are at risk of becoming, a victim of sex trafficking.⁵⁰

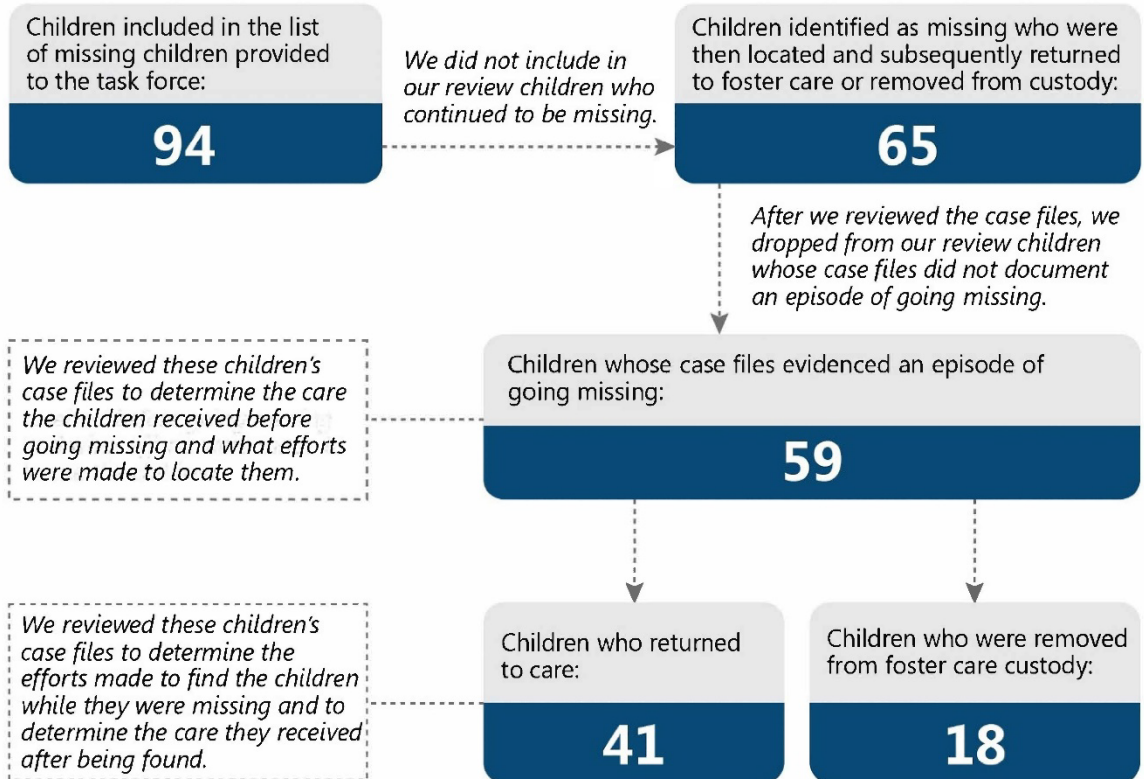
Methodology

This study focused on Missouri's attempts to locate children who were missing from care, and on its provision of services before and after their episodes of going missing. Missouri provided the task force (e.g., OIG, DOJ, and local law enforcement) with a list of 94 children who were missing from care on July 31, 2019 (i.e., children who were categorized as being in "RUN" status).⁵¹ The task force used this list from July 31, 2019, to locate children missing from Missouri foster care. For this case study, we used the same list to identify 65 children who were either located or removed from foster care custody (i.e., Missouri had ended its legal authority and responsibility to care for them) by August 30, 2019.

First, we determined which of the 65 children's case files showed evidence that they had an episode of being missing; the case files for 6 children showed that they had not had such an episode. For the 59 children whom we identified with an episode of being missing, we evaluated whether Missouri followed applicable Federal and State laws, policies, and procedures to protect these children before and during their episodes of being missing. We also evaluated whether Missouri provided services to these children that may reduce the risk of going missing.

We determined that 41 of these 59 children returned to foster care during our review period. For these 41 children, we evaluated whether Missouri followed applicable Federal and State laws, policies, and procedures to provide health and safety checks for these children. The remaining 18 children were removed from foster care custody (i.e., Missouri ended its legal authority and responsibility to care for them). See Exhibit 1 for an illustration of the number of children whom we included at each stage of this evaluation.

Exhibit 1: Flowchart of children in foster care whom our review included



Source: OIG analysis of documentation in foster care case files, 2021.

For additional information on our methodology, see the Detailed Methodology on page 19 of this report.

Limitations

It is possible that some children in our review received services that were not included in the documentation that Missouri submitted; therefore, this study may have underestimated the extent to which these children received required services and supportive services.

Standards

We conducted this study in accordance with the *Quality Standards for Inspection and Evaluation* issued by the Council of the Inspectors General on Integrity and Efficiency.

FINDINGS

Missouri does not have policies to identify children who may be at heightened risk of going missing or interventions to reduce their risk

ACF has identified risk factors associated with an increased risk of going missing from foster care and reported publicly to Congress that prevention efforts should be targeted towards children with these risk factors. However, there is no Federal law or regulation that requires States to develop policies for identifying such children and targeting efforts to reduce their risk, and Missouri does not have such policies.

In our review of case files, we found that before children went missing from Missouri foster care, 83 percent of the children (49 out of 59) had evidence in their case files of at least one of the risk factors that ACF identified as being associated with an increased likelihood of going missing from foster care. However, in only a few of the 49 case files did case managers note this heightened risk. Over half of the children who were missing from Missouri foster care had one or more previous episodes of going missing. More than a third of the children had six or more previous foster care placements. In our findings—which were consistent with research on the subject—the most common placement types from which children went missing were group homes and residential facilities. ACF has reported that prevention efforts should be targeted toward children with these risk factors.

Additionally, the case files for 39 percent of the children whose files we reviewed (23 out of 59) had no evidence of family visitation plans, which would have allowed the children to remain connected to caring adults and are required by Missouri policy.

See Exhibit 2 on the next page for the number of children who had evidence of each risk factor.

Exhibit 2: Most of the children had at least one risk factor associated with increased likelihood of going missing from care.



Source: OIG analysis of documentation in foster care case files, 2021.

Though many children had these risk factors, there was little evidence that Missouri attempted to reduce their risk of going missing. Prior to children's episodes of going missing from foster care, Missouri provided only 7 of the 49 children (14 percent) with services to reduce their risk of going missing. Two case files contained evidence that children had been referred to a child advocacy center. One child had a tracking device placed on the child's phone to help locate the child if the child did go missing from care. The other four children were moved to a placement that could provide a more secure setting to prevent them from going missing. None of the case files contained evidence that case managers had discussed with the children the dangers of their going missing or provided additional services to reduce the potential that the children would go missing.

Frequently there was no evidence that Missouri took the required actions to locate children who were missing from foster care

Federal law requires Missouri to develop policies that require case managers to aid in locating children who have gone missing from foster care. Although Missouri developed these policies, the documentation we reviewed showed that case managers often did not follow them. These policies require case managers to (1) report children as missing to entities who assist in locating missing children and (2) make contact with individuals who may have information about a child's whereabouts.

Nearly half of the children were not reported as missing to either local law enforcement or to the National Center for Missing and Exploited Children, as required by Federal law

For 46 percent of children (27 out of 59) who were missing from foster care, there was no evidence of that their case managers reported them as missing to either local law enforcement or to the National Center for Missing and Exploited Children (NCMEC), as required by Federal law and Missouri policy.⁵² Specifically, the case files of 33 children had no evidence that the children were reported as missing to law enforcement, and the case files for 38 children had no evidence that the children were reported as missing to the NCMEC. Without documentation of such reporting, Missouri cannot be assured that case managers reported children missing as required. When case managers fail to report children as missing to law enforcement or the NCMEC, these entities are not able to provide assistance in locating the missing children.

Law enforcement and the NCMEC both provide avenues for locating and identifying children who are missing from foster care. Notifying law enforcement provides officers with the information they need to identify and return children who are missing from foster care. Notifying the NCMEC provides additional supports to the foster care agency while it searches for a missing child, as the NCMEC coordinates the creation and dissemination of missing-children posters.⁵³ Without these supports, the number of people actively looking for missing children decreases.

Missouri often failed to make State-required notifications and contacts to seek information on children’s whereabouts

For 61 percent of children (36 out of 59), there was no evidence that the case managers notified the adults in the child’s life when the child went missing from care,

One child who was missing from Missouri foster care was identified as having been sex-trafficked—in as many as four States—while missing. There was no evidence that this child had been reported as missing or that any requirements that could have aided in locating this child were complied with.

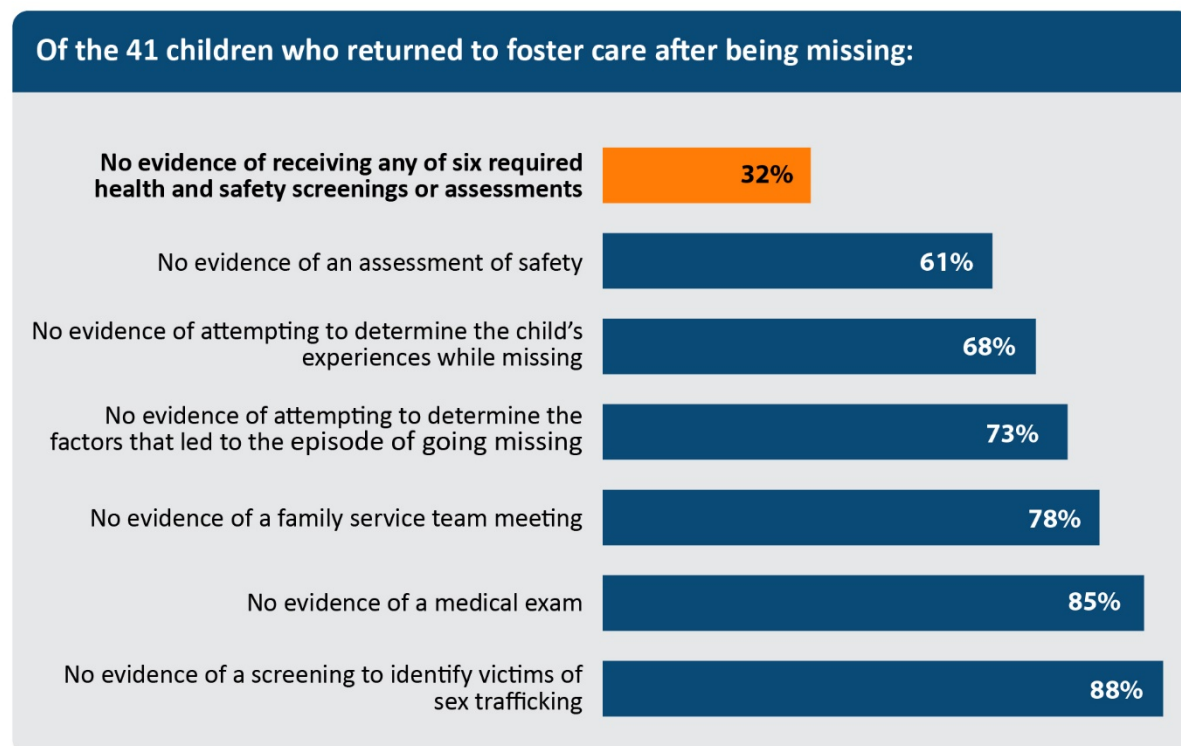
as required by Missouri policy. The adults include the juvenile officer, court representative, and parent(s) of the child. These notifications are important because these adults may have information about a child’s whereabouts, and the child could contact one of these adults while missing. When none of these individuals are contacted, the foster care agency could miss critical information to aid in locating the child.

Additionally, Missouri policy requires the foster care case manager to contact family members, friends, or others who may have information about the child’s whereabouts. The policy requires the case manager to make these contacts at a minimum of once per month until the child is located. For 63 percent of the children (37 out of 59), there was no evidence of any contacts being made within the first month of the child’s being missing.

One in three children whose cases we reviewed did not have evidence in their case files of receiving any required health and safety checks following their return to foster care

Of the 41 children who returned to Missouri foster care after being missing, 32 percent (13 out of the 41 children) had case files that did not have evidence that the children received any required health and safety checks following their return. Missouri policy requires case managers to complete several checks related to children’s health and safety after children return from being missing. The majority of files did not show evidence that children received a screening to identify victims of sex trafficking, a medical exam, a family service team meeting (i.e., a meeting involving a multidisciplinary team to assess concerns such as the child’s safety and foster care placement), or an assessment of their safety. Additionally, the files for many children did not have evidence—contrary to requirements—that a case manager attempted to determine the factors that led to the child’s going missing or the child’s experiences while missing from care. See Exhibit 3 for the numbers of children who did not receive each check.

Exhibit 3. There was no evidence that many children received required health and safety checks following their return to care.



Source: OIG analysis of documentation in foster care case files, 2021.

These health and safety checks are an important first step to understanding the experiences of children who go missing from foster care. Children may encounter dangerous situations, such as sexual exploitation or sex trafficking, and may

experience adverse health outcomes. Our review identified several of these dangerous situations and experiences. For example, several children had experiences living in unsafe environments and using drugs while missing. Additionally, a few of the children became pregnant while missing and one child was trafficked for sex.

If these required checks are not performed, children's trauma may go undetected and children may not receive critical supportive services to help address trauma they experienced while missing from care. A child may benefit from supportive services such as therapy to address the child's mental health needs, or a change in placement to reduce the child's risk of going missing in the future.

One child who returned to foster care after having been missing had no evidence in her case file of receiving any required health and safety checks. The day this child returned to care, she told her case manager that she had met a man online and asked the case manager to drive her across the State to live with him. When the case manager refused to drive the child, the child attempted to hitchhike there.

It is possible that this child was being recruited for sex trafficking, or that she had already been trafficked while she was missing from care. But without her having been properly screened, it is difficult to know for sure. Because the case manager had not ensured that any of the required health and safety checks were conducted, the case manager could not know what traumas this child had experienced and therefore could not know which services might be needed.

In our review, there was no evidence that 63 percent of children (26 out of 41) received any supportive services following their return. Of the children who received supportive services, some children were placed with family or friends, as preferred by the child, while others were placed in residential or therapeutic homes⁵⁴ to attempt to prevent additional episodes of their going missing. Some children were referred for therapy or counseling, and a few children were placed in the home of a supportive, trusted adult. Additionally, three children were referred to a child advocacy center for further screenings and services.

Missouri's case management system does not accurately identify children who are missing from foster care

In our interviews with officials from Missouri's foster care agency, we learned that the agency's case management system does not distinguish between children who are missing from their placement but whose whereabouts are unknown from those who are in an unapproved—but known—placement. Both types of children appear in Missouri's system with the status "RUN." This lack of distinction between the two types makes it difficult to determine if a child is truly missing.

The "RUN" status encompasses many scenarios, such as a child's location being known but unapproved; a child's whereabouts being unknown; and a child's location being unknown but the child's having occasional contact with the case manager. Some children leave their assigned placements to live in a location not assigned by their case manager—for example, with a friend or family member who is not approved by the foster care agency. They are then described as being in "unapproved placements," but the case managers often know where the children are and continue to provide required visits and other services to these children. Nearly 1 in 5 children selected for our review (12 of 65) were not missing from foster care at the time they were included on the list of missing children that was provided to the task force. Instead, these children were in unapproved placements.

This limitation within Missouri's case management system creates challenges for case managers and those conducting oversight. For the cases we reviewed, the case managers knew the true status of the children in their caseloads (as evidenced by their notes and documentation in the case files). However, if a case manager does not sufficiently document a child's status and the child's whereabouts, a new case manager who takes over the child's case may not know where the child is located. Further, the ambiguity of the "RUN" status may impede the ability of supervisors—and others who oversee case managers—to determine whether case managers completed every required action that was applicable to the child's situation. Additionally, this data limitation makes it extremely difficult to know the true number of missing children, and to coordinate with law enforcement and others who should be attempting to locate these missing children.

CONCLUSION AND RECOMMENDATIONS

The Missouri foster care agency (Missouri) missed opportunities to identify and mitigate children’s risk for going missing from foster care. Additionally, there is no evidence that once children went missing, Missouri complied with State and Federal requirements or effectively used all resources available to assist in locating the children. Further, once the children were located, Missouri appeared to do little to ensure that they would not go missing again, or to ensure that they received supportive services to address trauma they experienced while missing from care.

These findings raise concerns about Missouri’s ability to protect vulnerable children from the risks associated with being missing from foster care.

In response to engagement with OIG during this evaluation, Missouri has taken steps to improve in some of these areas of concern. With regard to human trafficking, Missouri developed a policy, training, and assessment tools. Missouri also developed and implemented a checklist of procedures for case managers to complete when a child is identified as missing from care and when the child is located. In addition, Missouri informed OIG that it had requested a change to its case management system to add additional status labels to distinguish between children who are missing from their placement and those who are in an unapproved placement. However, as of August 2021, this change had yet to be implemented because of budget constraints.

Thousands of children are missing from foster care systems across the nation. These findings in Missouri provide potential insight into systemwide challenges and deficiencies that other State foster care agencies may share. These findings suggest that other States may benefit from engaging with ACF about potential deficiencies in their States. Such deficiencies may include problems with fulfilling requirements when children go missing from and return to foster care, as well as challenges in identifying and attempting to reduce risk factors for children’s going missing.

We recommend that the Missouri foster care agency:

Develop policies to help identify (a) children who have a heightened risk of going missing from care and (b) interventions that could reduce their risk

The Missouri foster care agency should use risk factors—such as those that ACF has identified—to identify children who are at greater risk of going missing from care and target interventions and resources that could reduce that risk. Some of the risk factors that ACF identified include having a history of going missing; having had multiple previous foster care placements; being placed in a group home or

a residential facility; and lacking relationships with caring adults. Missouri should use these risk factors to develop policies that assist case managers in identifying children who have a heightened risk of going missing. Additionally, Missouri should develop policies to instruct case managers on ways to reduce this risk. Missouri should increase use of existing resources—such as child advocacy centers—to reduce children’s risk of going missing, and it should evaluate the development of additional interventions.

Implement a monitoring mechanism to ensure that case managers comply with requirements and document their compliance when children are identified as missing and when they are located or return to care

Missouri should ensure that case managers are consistently complying with and documenting each requirement within the specified timeframes in which children are identified as missing and when they are located or return to care. To do this, Missouri could monitor the use of the checklist it developed. Further, to facilitate this oversight, Missouri could consider integrating the checklist into a data system, including fields for case managers to add the date each requirement is completed. Additionally, Missouri could consider providing additional training to case managers on how to complete and document these requirements effectively. For example, Missouri could provide a standard screening tool to identify victims of sex trafficking and could provide standard questions to determine children’s experiences while missing and factors that led to their going missing.

Implement improvements to the case management system to enable accurate identification of children who are missing from care

We recommend that Missouri implement—after seeking the necessary funding—a case management system change that would allow for the accurate identification of the status of each child in Missouri’s foster care program. Missouri should be able to accurately and easily identify the status of each child in its foster care program, such as “location known but unapproved,” “whereabouts unknown,” and “location unknown but in occasional contact with the case manager.”

We also recommend that ACF:

Develop a forum for States to share experiences and best practices related to the following: reducing children’s risk for going missing from foster care, locating missing children, and addressing their needs after they return to care

ACF offers many opportunities for States to share ideas and experiences with each other. ACF should develop a new forum or use an existing forum for States to share how they are working to reduce children’s risk for going missing from foster care and how they attempt to locate and return children to care after they have gone missing. The forum should also discuss best practices related to addressing the needs of children after they return to care.

Support Missouri as it works to reduce children’s risk for going missing from foster care and to improve compliance with Federal and State requirements related to children who go missing

ACF should support Missouri in its efforts to reduce children’s risk for going missing from foster care and to improve compliance with Federal and State requirements related to children who have gone missing. For example, Missouri may need assistance in ensuring that case managers comply with State and Federal requirements when a child is identified as missing or located after being missing, or assistance in improving its case management system to accurately identify children who are missing from care. Other States may also need the same kind of support that ACF provides to Missouri.

STATE AND AGENCY COMMENTS AND OIG RESPONSE

The Missouri Department of Social Services (Missouri) did not explicitly concur or nonconcur with our three recommendations to its agency, but it did note actions it has taken in response to our recommendations and agreed to take additional responsive actions. ACF concurred with our two recommendations to its agency.

Missouri agreed with our recommendation to develop policies to identify children who have a heightened risk of going missing from foster care and interventions that could reduce their risk. Missouri stated that it developed and implemented policy, training, practice alerts, and assessment tools related to human trafficking while this review was being completed. Additionally, Missouri is collaborating with community partners to provide services for children who have been trafficked or are at heightened risk for trafficking.

Missouri did not explicitly agree or concur with our second recommendation—to implement a monitoring mechanism to ensure that case managers comply with and document required actions that are taken when children are identified as missing and when they are located. However, Missouri did state that it developed policies and procedures, effective September 2020, to ensure that its staff document compliance with requirements to notify law enforcement and others when children go missing from foster care.

Missouri agreed with our recommendation to implement improvements to the case management system to enable accurate identification of children who are missing from care. Missouri stated that it is evaluating potential system and document management changes to address this recommendation.

ACF concurred with both of our recommendations. With regard to our first recommendation to ACF—to develop a forum for States to share experience and best practices related to reducing children’s risk for going missing from foster care, locating children, and addressing their needs after they return to care—ACF stated that it will work in fiscal year 2022 to develop new, or build upon existing, forums for States to share strategies for these issues. With regard to our second recommendation to ACF—to support Missouri as it works to reduce children’s risk for going missing from foster care and to improve compliance with Federal and State requirements related to children who go missing—ACF stated that its Regional Office will work with Missouri to provide a forum to discuss this topic and to provide Missouri with information for requirements and best practices for prevention and addressing the children and family’s needs when the children are located after being missing.

We appreciate Missouri's and ACF's steps to address these important issues. OIG urges both Missouri and ACF to continue their work in this area to ensure that children in foster care are protected from the dangers of going missing from care.

For the full text of Missouri's comments, see Appendix A. For the full text of ACF's comments, see Appendix B.

DETAILED METHODOLOGY

Data Collection

We collected information from Missouri. We received confirmation from Missouri that (1) we correctly interpreted its policies, which are publicly available; (2) our list of its policies was comprehensive; and (3) these policies were all applicable during the relevant time period. We received the foster care case files for the 65 children we selected from the list—provided to the task force—of missing children who were located or released from Missouri foster care custody. The list of missing children included a date on which each child went missing. For each child, we received documentation from 6 months prior to the date the child went missing through 6 months following the date the child returned to care or was removed from Missouri foster care custody.

Data Analysis

We determined whether documentation indicated that the selected children received services according to Missouri foster care policy.

We reviewed the foster care case files for evidence that the children were provided the required services. Specifically, we reviewed the documentation for evidence that Missouri followed (1) the requirement to develop a visitation plan with family members, (2) the requirements for when children went missing, and (3) the requirements to conduct health and safety checks for children following their return to care. Further, we reviewed the documentation to determine which, if any, supportive services Missouri provided after the children were located. We asked Missouri officials clarifying questions to ensure accurate interpretation of the material that we found in the case files. Additionally, we shared our preliminary results with Missouri and provided an opportunity for it to submit additional case file documentation.

In addition to reviewing the documentation of services that the children received, we determined whether the children had any characteristics associated with a higher risk of going missing from care. We determined whether Missouri identified these children as having any of these characteristics, and whether it attempted to address these characteristics to reduce the risk of the children's going missing. We accepted any evidence indicating that a case manager attempted to reduce a child's risk of going missing. Some examples of specific things we looked for include the following: evidence of conversations between the case manager and child discussing the dangers of going missing or strategies for the child to remain in the child's placement; changes in placement settings; referrals to child advocacy centers; and any

other services or strategies that could potentially reduce a child's risk of going missing from care.

During our review, we found that 12 of the 65 children were not missing from care at the time the list of missing children was provided, July 31, 2019. Rather, the case managers knew these children's whereabouts, but the children were in unapproved placements. We did not consider these instances of unapproved placements when we evaluated whether requirements were fulfilled, as these requirements were not applicable to these children's situations. However, six of these children had been missing from care just prior to their unapproved placements. In our evaluation of whether requirements were fulfilled, we included these 6 children's episodes of being missing, resulting in a review of 59 children's episodes of being missing.



MICHAEL L. PARSON, GOVERNOR • JENNIFER TIDBALL, ACTING DIRECTOR

P.O. BOX 1527 • BROADWAY STATE OFFICE BUILDING, JEFFERSON CITY, MISSOURI 64576
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September 21, 2021

Suzanne Murrin
Deputy Inspector General
for Evaluation and Inspections
U.S. Department of Health and Human Services
330 Independence Avenue, SW.
Washington, DC 20201

Sent via e-mail to OIG.OEIRports@oig.hhs.gov.

RE: Office of Evaluation and Inspections (OEI) Case Study Draft Report: “Missouri Efforts to Protect Children Missing from Foster Care”

Dear Ms. Murrin:

Please find below the Missouri Department of Social Services’ response to the draft report entitled, *Case Study: Missouri Efforts to Protect Children Missing From Foster Care*. Our response to each recommendation is below:

(1) OEI recommends CD develop policies to identify children at a heightened risk of going missing from care and interventions that could reduce such risk.

- Although such policies are not specifically required by federal or state law, CD agrees with OEI on the importance of policies and procedures for identifying youth at heightened risk of going missing. CD also concurs with OEI that human trafficking policy and assessment and tools will provide critical improvements to CD practice. Accordingly, CD has developed human trafficking policy, training, practice alerts, and assessment tools while OEI conducted its review, including:
 - Human Trafficking Assessment Tool (CD-288), building on similar assessment tools from New York and Florida.
 - CD Memoranda: Human Trafficking Policy & Training.
 - CD Human Trafficking Policy (July 9, 2021) (for the Child Welfare Manual).
 - PA21-IA-03 Child Sex Trafficking Recovery Services Team (RST) (CD Practice Alert) (June 10, 2021).
 - Human Trafficking Training and Advanced Human Trafficking employee training and learning modules.
- Moreover, CD has expanded collaborations with community partners such as Crisis Aid’s Children’s Anti-exploitation Partnership Program (CAPP) to provide or identify services for children who have been trafficked or are at heightened risk for trafficking.

AUXILIARY AIDS AND SERVICES ARE AVAILABLE UPON REQUEST TO INDIVIDUALS WITH DISABILITIES
TDD / TTY: 800-735-2966
RELAY MISSOURI: 711

Missouri Department of Social Services is an Equal Opportunity Employer Program.

(2) OEI recommends CD implement a monitoring mechanism to ensure case managers complete and document requirements when children are identified as missing and when they are located or return to care.

- OEI found CD frequently lacked documentation to prove case managers took adequate actions to locate children missing from care and contacted all appropriate individuals within specified timeframes.
- CD has developed policies and procedures to prevent future failures to document notifications and contacts of law enforcement, family support team members, and family members.
 - Historically, CD staff has had trouble convincing some local law enforcement agencies to accept reports that children and youth in care were missing, particularly for children and youth seventeen years and older.
CD developed alternative protocols with the Missouri State Highway Patrol (MSHP) to implement procedures for reporting children and youth in care as missing when local law enforcement agencies refuse to accept reports. Although CD's new protocols should rectify this issue in the future, CD's historic inability to convince some law enforcement agencies to accept reports on missing children and youth may have discouraged CD staff from providing appropriate notice or appropriately documenting such notices in the past.
 - CD has also implemented additional policies and procedures to ensure staff properly document and preserve required notifications, contacts, and the provision of health and safety checks and supportive services in CD's document and case management systems, including by developing a compliance checklist for staff and supervisors, adding regional and central office oversight to monitor compliance, and implementing additional procedures for the uploading of documentation.
 - See, for example, Child Welfare Manual Section 4, Chapter 4, Subsection 9 (Missing Person Report Procedure) (eff. Sept. 11, 2020); Regional Checklist - Youth on Run Status – Report; Steps When a Youth Goes Missing Checklist.

(3) OEI recommends CD adopt case management system improvements to enable accurate identification of children who are missing from foster care.

- OEI found CD's case management system lacks the capacity to distinguish between children identified as missing whose whereabouts are unknown and children identified as missing who are residing in unapproved — but known — placements, making case management, federal and state oversight, and appropriate documentation more difficult.
- CD agrees with OEI that its case-management categorization of children on run status would be improved by distinguishing between the types of run statuses. CD is currently evaluating potential system and document management changes that would improve CD practice and be consonant with OEI's recommended changes.

Thank you for the opportunity to provide comments to this draft report and to work with OEI. Please feel free to contact Joan Rogers, Interim Children's Division Director at 573-751-8962 or Joan.Rogers@dss.mo.gov with any questions. We appreciate the feedback provided.

Sincerely,



Jennifer R. Tidball
Acting Director

JRT:bsb

Appendix B

Administration for Children and Families Comments



ADMINISTRATION FOR CHILDREN & FAMILIES

Office of the Assistant Secretary | 330 C Street, S.W., Suite 4034
Washington, D.C. 20201 | www.acf.hhs.gov

September 14, 2021

Suzanne Murrin
Deputy Inspector General
for Evaluation and Inspections
U.S. Department of Health and Human Services
330 Independence Avenue, SW.
Washington, DC 20201

Dear Ms. Murrin:

I am writing to you concerning the Administration for Children and Families' (ACF) response to the recommendations for ACF found in the draft report entitled, *Case Study: Missouri Efforts to Protect Children Missing From Foster Care*. ACF appreciates the work that the Office of Inspector General (OIG) performed in this area. Further, ACF concurs with the two recommendations made in the report. Our response to each recommendation is below.

OIG Recommendation #1: Develop a forum for States to share experiences and best practices related to reducing children's risk for going missing from foster care, locating children, and addressing their needs after they return to care.

ACF Response: ACF concurs with this recommendation. The Children's Bureau (CB) provides training and technical assistance to states designed to facilitate the sharing of experiences and best practices. We will continue to work with our technical assistance providers in fiscal year (FY) 2022 to develop new or build upon existing forums for states to share strategies for reducing children's risk for going missing from foster care, locating children, and addressing their needs after they return to care. The Capacity Building Center for States (CBCS) currently leads peer groups that support discussions and provide a forum for sharing strategies around these topics. For example, the *State Foster Care Managers* peer group is specifically for state-level foster care managers to share ideas and strategies. CBCS also maintains two listservs associated with the *Preventing and Addressing Sex Trafficking* peer group. One listserv is comprised of multidisciplinary teams engaged in preventing and addressing sex trafficking, and the other is specific to child welfare agency personnel focused on this work. CB and CBCS will identify a peer-to-peer meeting and/or create a space on the CBCS-hosted Microsoft Teams channel for the Foster Care Managers peer group to address this topic in FY22.

OIG Recommendation #2: Support Missouri as it works to reduce children's risk for going missing from foster care and improve compliance with Federal and State requirements related to children who go missing.

ACF Response: ACF concurs with this recommendation. The CB Region 7 Office (RO) provides training and technical assistance to states designed to facilitate the sharing of experiences and best practices. The RO will continue this effort to support Missouri in reducing

children’s risk for going missing from foster care and improve compliance with federal and state requirements related to children who go missing. The RO will utilize an established agency Child Welfare Director’s call to provide a forum to discuss this topic as well as provide information for requirements and best practices for prevention and addressing the children and family’s needs when the children are located from runaway/missing status. Additionally, the RO gathered and reviewed Missouri’s current related policies and will continue discussions with the state agency surrounding the effectiveness of their training, practices, and policies related to this work effort.

ACF appreciates the opportunity to provide comments on the draft report and welcomes any further questions that the OIG may have regarding these issues. Please direct any follow-up inquiries to our Office of Legislative Affairs and Budget OIG liaison, Scott Logan, at (202) 401-4529.

Sincerely,

A handwritten signature in black ink, appearing to read 'JooYeun Chang', written in a cursive style.

JooYeun Chang
Acting Assistant Secretary
for Children and Families

ACKNOWLEDGMENTS AND CONTACT

Acknowledgments

Abbi Warmker, a Deputy Regional Inspector General for Evaluation and Inspections in the Kansas City regional office, served as the team leader for this study. Haley Lubeck and Andrea Staples served as analysts. Office of Evaluation and Inspections headquarters staff who provided support include Althea Hosein, Kevin Manley, and Christine Moritz.

We would also like to acknowledge the contributions of other Office of Inspector General staff, including Jessica Swanstrom.

This report was prepared under the direction of Brian Whitley, Regional Inspector General for Evaluation and Inspections in the Kansas City regional office, and Dana Squires, Deputy Regional Inspector General.

Contact

To obtain additional information concerning this report, contact the Office of Public Affairs at Public.Affairs@oig.hhs.gov. OIG reports and other information can be found on the OIG website at oig.hhs.gov.

Office of Inspector General
U.S. Department of Health and Human Services
330 Independence Avenue, SW
Washington, DC 20201

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ENDNOTES

¹ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. This report was mandated by Section 105 of the Preventing Sex Trafficking and Strengthening Families Act of 2014 and addressed (1) children who run away from foster care and their risk of trafficking victimization; (2) State efforts to serve children who are sex trafficking victims; and (3) State efforts to support long-term connections to caring adults for children in foster care.

² ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

³ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

⁴ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

⁵ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

⁶ See §§ 428 and 432(b)(2) of the Act for Title IV-B eligibility requirements for Tribes, and § 479B of the Act for Title IV-E eligibility requirements for Tribes. “Tribes” refers to Indian Tribes and Tribal organizations as defined in 25 U.S.C. 450(b).

⁷ 45 CFR §§ 1357.15(b) and 1356.20(c)(2).

⁸ ACF, “Capacity Building Services.” Accessed at <https://www.acf.hhs.gov/cb/capacity> on April 27, 2020.

⁹ ACF, Information Memorandum ACYF-CB/FYSB-IM-14-1, 2014. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/fysb_im1401.pdf on April 26, 2021.

¹⁰ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*, September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

¹¹ Residential care facilities are a type of live-in, out-of-home care placement in which staff are trained to work with children whose specific needs are best addressed in a highly structured environment. ACF, “Group and Residential Care.” Accessed at <https://www.childwelfare.gov/topics/outofhome/group-residential-care/> on February 4, 2020.

¹² ACF, “The Importance of a Trauma-Informed Child Welfare System.” May 2020. Accessed at https://www.childwelfare.gov/pubPDFs/trauma_informed.pdf on September 27, 2021.

¹³ ACF, “Guidance to States and Services on Addressing Human Trafficking of Children and Youth in the United States.” September 2013. Accessed at <https://www.acf.hhs.gov/cb/resource/human-trafficking-guidance> on April 24, 2019.

¹⁴ ACF, “Guidance to States and Services on Addressing Human Trafficking of Children and Youth in the United States.” September 2013. Accessed at <https://www.acf.hhs.gov/cb/resource/human-trafficking-guidance> on April 24, 2019.

¹⁵ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

¹⁶ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

¹⁷ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

¹⁸ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

¹⁹ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

²⁰ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

²¹ ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

²² ACF, *Report to Congress: The Child Welfare System Response to Sex Trafficking of Children*. September 2019. Accessed at https://www.acf.hhs.gov/sites/default/files/documents/cb/report_congress_child_trafficking.pdf on April 26, 2021. (See also note in endnote 1.)

²³ P.L. No. 113-183 (Sept. 29, 2014), § 101(a)(3)(C)(i), incorporated at § 471(a)(35)(A)(i) of the Act.

²⁴ The Act § 471(a)(35)(B).

²⁵ The National Center for Missing and Exploited Children is a private nonprofit organization whose mission is to help find missing children, reduce child sexual exploitation, and prevent child victimization. National Center for Missing and Exploited Children, "About Us." Accessed at <https://www.missingkids.org/footer/about> on September 17, 2021.

²⁶ The Act § 471(a)(9)(C)(i).

²⁷ The Act § 471(a)(2).

²⁸ This report evaluates Missouri's compliance with policies from the *Child Welfare Manual* effective during the scope of this review. The *Child Welfare Manual* has subsequently been updated and policies may be located in different chapter subsections; however, the policies remain unchanged. The current manual is online at <https://dssmanuals.mo.gov/child-welfare-manual/child-welfare-manual-2019-update/>.

²⁹ Missouri Department of Social Services (DSS), *Child Welfare Manual* (see note in endnote 28), § 4 ch. 10.3. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-10-case-management-activities-subsection-3-visitation-between-parents-children-and-siblings/> on January 21, 2020.

³⁰ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 10.3. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-10-case-management-activities-subsection-3-visitation-between-parents-children-and-siblings/> on January 21, 2020.

³¹ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 10.3. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-10-case-management-activities-subsection-3-visitation-between-parents-children-and-siblings/> on January 21, 2020.

³² P.L. No. 113-183 (Sept. 29, 2014), § 101(a)(3)(C)(i), incorporated at § 471(a)(35)(A)(i) of the Act.

³³ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020.

³⁴ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020.

³⁵ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.1. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. Missouri DSS has since updated this policy.

³⁶ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.1. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. The Missouri DSS has since updated this policy.

³⁷ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.1. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. The Missouri DSS has since updated this policy.

³⁸ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.4. (eff. date 5/1/19). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. The Missouri DSS has since updated this policy.

³⁹ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 7.2. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-7-family-support-teams-subsection-2-composition-of-family-support-teams/> on January 21, 2020.

⁴⁰ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.4. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. The Missouri DSS has since updated this policy.

⁴¹ Missouri DSS, *Child Welfare Manual* (see note in endnote 28), § 4 ch. 4.9.4. (eff. date 5/1/2019). Accessed at <https://dssmanuals.mo.gov/child-welfare-manual/section-4-chapter-4-working-with-children-subsection-9-missing-person-report-procedure/> on January 21, 2020. The Missouri DSS has since updated this policy.

⁴² Child advocacy centers are community-based, child-friendly, multidisciplinary services for children and families affected by sexual abuse or severe physical abuse. These centers bring together—often in one location—child protective services investigators, law enforcement, prosecutors, and medical and mental health professionals to provide a coordinated, comprehensive response to victims and their caregivers. ACF, “Child Advocacy Centers.” Accessed at <https://www.childwelfare.gov/topics/responding/ia/investigation/multidisciplinary/advocacy/> on July 6, 2021.

⁴³ 45 CFR § 1355.40.

⁴⁴ ACF, "OTIP Partners with HHS Office of Investigations to Locate Missing Kansas Foster Children." January 2019. Accessed at <https://www.acf.hhs.gov/otip/news/projecthope> on October 24, 2019.

⁴⁵ U.S. Immigration and Customs Enforcement, "HSI operation nets 82 arrests and 31 rescued from human trafficking operation." June 29, 2021. Accessed at <https://www.ice.gov/news/releases/hsi-operation-nets-82-arrests-and-31-rescued-human-trafficking-operation> on July 7, 2021.

⁴⁶ OIG, *ACF Cannot Ensure That All Child Victims of Abuse and Neglect Have Court Representation*, March 2021. Accessed at <https://oig.hhs.gov/oei/reports/OEI-12-16-00120.pdf> on July 7, 2021.

⁴⁷ OIG, *Kansas Did Not Ensure That Group Homes for Children in Foster Care Complied With All State Health and Safety Requirements*, July 2020. Accessed at <https://oig.hhs.gov/oas/reports/region7/71906087.pdf> on September 8, 2021.

⁴⁸ OIG, *Treatment Planning and Medication Monitoring Were Lacking for Children in Foster Care Receiving Psychotropic Medication*, September 2018. Accessed at <https://oig.hhs.gov/oei/reports/OEI-07-15-00380.pdf> on July 7, 2021.

⁴⁹ OIG, *Not All Children in Foster Care Who Were Enrolled in Medicaid Received Required Health Screenings*, March 2015. Accessed at <https://oig.hhs.gov/oei/reports/OEI-07-13-00460.pdf> on July 7, 2021.

⁵⁰ OIG Work Plan. Accessed at <https://oig.hhs.gov/reports-and-publications/workplan/summary/wp-summary-0000396.asp> on July 7, 2021.

⁵¹ During our review, we found that not all children included on the list were missing from care on July 31, 2019. Twelve children were in unapproved placements, and six children had been located or released from custody days or weeks prior.

⁵² Missouri officials reported that case workers had challenges in convincing local law enforcement to accept reports that children in care were missing, particularly for children who were 17 years old or older. Officials stated that this challenge may have discouraged case workers from continuing to report children as missing to law enforcement, as required. Since our review, Missouri has developed alternative protocols with the Missouri State Highway Patrol to implement procedures for reporting children in care as missing when local law enforcement failed to accept reports.

⁵³ National Center for Missing and Exploited Children, "Endangered Runaways." Accessed at <https://www.missingkids.org/theissues/runaways> on April 1, 2021.

⁵⁴ Therapeutic foster care is designed to provide safe and nurturing care to a child or youth in a more structured home environment than typical foster care, and it can be a cost-effective alternative to residential treatment. ACF, "What Is Treatment Foster Care?" Accessed at <https://www.childwelfare.gov/topics/outofhome/foster-care/treat-foster/what-treat/> on September 22, 2021. (See also endnote 11.)