

**DSS ADMINISTRATIVE LETTER
CHILD WELFARE SERVICES CWS-AL-04-11**

TO: COUNTY DIRECTORS OF SOCIAL SERVICES

**ATTENTION: CHILDREN'S SERVICES PROGRAM ADMINISTRATORS & MANAGERS
CHILD WELFARE SUPERVISORS, CHILDREN'S SERVICES SOCIAL WORKERS
DATA ENTRY SUPERVISORS**

DATE: June 16, 2011

SUBJECT: COMPLETION OF THE [DSS-5104](#) WHEN THE IDENTITY OF THE PERPETRATOR IS UNKNOWN

EFFECTIVE DATE: IMMEDIATELY

I. INTENT

This Administrative Letter is intended to inform county data entry workers and county CPS Assessment social workers of a procedural change to the Central Registry and completion of the [DSS-5104](#) when the identity of the perpetrator of child abuse and/or neglect is not able to be determined.

II. BACKGROUND

Policy and user instructions for the completion of a [DSS-5104](#) Report to Central Registry/CPS Application are located in [Section 1426a](#) of the Family Services Manual; Volume 1 Children's Services; Chapter 8.

There are instances when at the completion of a CPS Assessment the identity of the perpetrator of child abuse and/or neglect cannot be determined. For instance, the assessment may involve an abused child and the assessment is not able to determine if the abuse occurred when the child was at a childcare facility, the parents' home or with grandparents. The child is clearly abused but there is no way to determine who the perpetrator is. It is required that the child's status as abused be entered into the central registry; however, the system currently requires that the name of a perpetrator also be entered. In this rare circumstance, practice has been to use "unknown" for the first and last name and an estimated date of birth.

The accurate reporting of data is an on-going partnership between county departments of social services and the Division; therefore, the Division recognizes that reporting a name as "unable to determine" is more accurate than "unknown". The Division has worked with the Division of Information and Resource Management (DIRM) to allow for the completion of a [DSS-5104](#) when there is a maltreatment finding but the perpetrator has not been identified.

This scenario should be a rare occurrence. Counties are encouraged to consider if there are additional case activities that would help to identify a perpetrator before using this option.

III. INSTRUCTIONS

On the [DSS-5104](#) this change will impact Fields 23, 31 and 33 through 40.

Field 23 - Perpetrator Relationship Code. The instructions for this field will have an additional instruction which reads: This field may be left blank if the finding reason code in Field 31 is "05".

Field 31 Findings Reason - Code "05" definition will reflect "at the time of case decision, protection of child from the perpetrator was not an issue OR the identity of the perpetrator was not able to be determined."

Field 33 - Perpetrator Name. This field will now be able to be left blank only if the code in Field 31 is "05".

Fields 34 through 40 will not require an entry if the code in Field 31 is "05".

These changes will be updated in the on-line manual at the next scheduled update. Should you have further questions regarding these changes please contact your Children's Program Representative (CPR), the Policy Team at (919) 733-4622 or Performance Management at (919) 733-8938.

Sincerely,



Kevin Kelley, Interim Chief
Child Welfare Services

cc: Sherry S. Bradsher
Jack Rogers
Kathy Sommese
Child Welfare Services Team Leaders
Children's Services Program Representatives
Local Business Liaisons