

CF OPERATING PROCEDURE
NO. 175-67

STATE OF FLORIDA
DEPARTMENT OF
CHILDREN AND FAMILIES
TALLAHASSEE, August 1, 1998

Family Safety and Preservation

FINALIZED ADOPTION CASES AND AUTOMATED SYSTEM CLIENT IDENTIFIERS

1. Purpose. This operating procedure provides instructions for separating pre- and post-adoption finalization Family Safety and Preservation records in the Client Information System (CIS), and in the Interim Child Welfare Services Information System (ICWSIS), under two different client identification numbers (CIDs) in order to prevent the child's birth name and birth parent information from being retrievable with the child's post-adoption client identification number.
2. Scope. This operating procedure is applicable to all districts and to all Family Safety and Preservation personnel.
3. Authority. Sections 63.162 and 409.146, Florida Statutes (F.S.).
4. General Requirements.
 - a. The Family Safety and Preservation caseworker is responsible for coordinating the changes to records with all other involved programs, in order that those programs may take the necessary steps to maintain statutory confidentiality of records. The caseworker will provide written notification of the statutory requirements regarding confidentiality of records to appropriate programs/providers. The caseworker must also follow-up with verbal communication with all providers to assess their understanding and encourage their cooperation. The caseworker will assist the other involved programs to determine how their records can be handled so that confidentiality is maintained within their system(s) and so that no post-adoption service records are added to the pre-adoption Client Information System client record, and no pre-adoption identifiers are entered into the post-adoption service records. The record split shall be made at finalization of the adoption and all subsequently entered records shall be made into the post-adoptive client record.
 - b. Social Security Administration policies may result in the child keeping the same Social Security Number (SSN) after adoption or receiving a new SSN after adoption. To avoid variations in practice for handling the problem, one of the two following alternatives shall be used, as appropriate:
 - (1) Retain Old SSN. If the child will retain the same SSN after adoption, the client demographic record associated with pre-adoption finalization Family Safety and Preservation records in the Client Information System (e.g., protective investigation, protective supervision, foster care, pre-finalization adoptive home supervision), and in the Interim Child Welfare Services Information System (ICWSIS), will have the client identification number changed to a pseudo identification number (initials of child's birth name and date of birth). The child's birth name will remain in this demographic record. Any services which are provided and recorded in CIS (e.g., ongoing Children's Medical Services, subsequent Family Safety and Preservation services), and/or in ICWSIS, after adoption finalization will be associated with a new demographic record with the SSN as the client identification number, and the child's adoptive name.
 - (2) Receive New SSN. If the child will receive a new SSN after adoption, the old SSN will be left in the Client Information System (and the Interim Child Welfare Services Information System) pre-adoption finalization demographic record with the child's birth name. Any post-adoption finalization

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Client Information System (or Interim Child Welfare Services Information System) services will be recorded under a new demographic record with the new SSN and the child's adoptive name. (A pseudo client identification number may be used for post-adoption finalization records during the period while the new SSN is being obtained, and updated to the new SSN as soon as it is received.)

c. All districts shall implement modifications to ICWSIS as it relates to how children are recorded in the system as soon as the modifications are provided to them by District 6. These changes will allow for the appropriate handling of the child's name and identification number during the period of adoption placement before finalization. ICWSIS will allow for the entry of the child's adoptive name and/or new SSN or pseudo identification number to the pre-adoption finalization record for purposes of subsidy payments. Once entered, these fields will be subject to a very high level of security and programmed into the system.

d. Since no system modifications are necessary to the Client Information System, districts shall implement the procedures contained in this operating procedure immediately.

e. At the time of adoption finalization, it is the responsibility of the Family Safety and Preservation caseworker to coordinate with the adoptive parents to determine whether a new SSN has been or is being obtained, and to coordinate with all other programs serving the child. With assistance from district management systems as needed, the Family Safety and Preservation caseworker must determine other programs with service records on the Client Information System for that child and assist them as required by paragraph 4f below.

f. If other programs continue serving the child, the Family Safety and Preservation caseworker must assist them in recording post-adoption services under the child's new identity by notifying them verbally and in writing of the statutory requirement for confidentiality of records of adopted children and by helping them determine how their records can best be handled. This can be done either by closing previous records under the old client identification number and opening new records under the new client identification number, or recreating the service history under the new client identification number. In no case shall pre-adoption identifiers be added to the new identity. If the child is receiving public assistance or Medicaid, the Family Safety and Preservation caseworker must also coordinate with the Economic Self-Sufficiency or Medicaid worker.

BY DIRECTION OF THE SECRETARY:

(Signed original copy on file)

SAMARA NAVARRO, D.B.A.
Deputy Secretary