



CASA

Court Appointed Special Advocates

FOR CHILDREN

**Child Advocates of Montgomery County
Advocate & Volunteer Policies**

Board Approved 9.15.22

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PLEDGE OF COMPLIANCE

Advocate Policies and Procedures

First and Last Name (print)

Relationship to CASA:
(Circle Applicable)

Advocate

Helping Heart

Employee

I, _____, acknowledge by my signature on this page that I have received and fully understand CASA Child Advocates of Montgomery County (CASA) policies that govern Advocates. Further, I agree to execute my duties in strict accordance with these policies. It is my clear understanding that, if I violate CASA's policies, I am subject to immediate termination of my relationship with this organization.

Signature: _____ Date: _____

ADVOCATE POLICIES

Mission:

Our mission is to provide quality court appointed volunteer advocacy so that every abused and neglected child can have the opportunity to thrive in a safe, nurturing permanent family.

Goal:

Our goal is to provide a Court-appointed Advocate to serve as Guardian ad Litem for every child who needs us and break the cycle of abuse in our community, one child at a time.

CASA Advocates:

CASA Advocates are the heart of our organization. Through the dedicated efforts of our Advocates, CASA is able to service abused and neglected children in our community. Having Advocate policies demonstrates to our community that:

- Respects and protects the children we serve
- Values the time, skills, and commitment of our Advocates
- Maintains policies and procedures for accountability and effective management
- Works to continually evaluate and improve the CASA Program

The policies in this CASA Advocate manual are intended to provide overall guidance and direction for our Advocates so that they can effectively advocate in the best interest for the abused, neglected and/or dependent children of CASA.

CASA volunteers advocate for the best interests of children and youth who are before the court because of abuse or neglect as the subject of a Suit Affecting the Parent Child Relationship living at home or in out of home care.

CASA Advocates are welcome to direct questions about these policies to the CASA program staff at any time.

The program maintains a confidential record for each volunteer that contains:

- Volunteer application
- Emergency and identifying contact information
- Volunteer job description
- References documentation
- Documentation of all record checks
- Pre-service training and continuing education records
- Performance evaluations and any other applicable documentation related to performance

- Documentation of volunteer status
- Copy of volunteer's current driver's license, motor vehicles records check and verification of automobile insurance (if transporting is applied to the case)
- Documentation of personal interview
- Name of each child assigned
- Date of each assignment
- Date of release from each assignment

Section 1 - General Policies

1.1 Requirements to Become a Child Advocate

- a) Minimum age of 21
- b) Complete a minimum of 30 hours of pre-service training using the Texas CASA blended curriculum, including at least 15 hours of in-person training for the staff to evaluate the applicant's suitability to serve as a volunteer, as well as 8 hours of immersive e-learning courses, in addition to the required 8 hours of prework.
- c) Observe three hours of Child Protective Services (CPS) court
- d) Complete a written/online application
- e) Complete an in-person interview with the Recruiting Manager and another member of the program management team
- f) Pass National criminal, National sex offender and Child Abuse and Neglect Central Registry background checks. Specifically, these include: a Texas criminal record check (obtained from the Texas Crime Information Center maintained by the Texas Department of Public Safety); a national criminal background check (obtained from the National Crime Information Center (NCIC) maintained by the Federal Bureau of Investigation) that includes a fingerprint check; Social Security number verification; Texas Public Sex Offender Registry check maintained by the Texas Department of Public Safety; National Sex Offender Registry check maintained by the United States Department of Justice; The Child Abuse and Neglect Central Registry maintained by the Texas Department of Family and Protective Services including other counties and states where the potential volunteer has lived in the previous 7 years. (Refusal to sign the release of info or to do the background check will disqualify a potential volunteer.) The required record checks will be repeated for each active volunteer at least every two years.
- g) Provide 3 or more satisfactory unrelated personal references prior to pre-service training
- h) Take an oath of confidentiality
- i) Be sworn in by a judge upon completion of the training before appointment to a case
- j) Complete 12 hours of continuing education training annually (pro-rated based on the volunteer's date of swear in). Continuing education hours should be related to the work of best interest advocacy and can be completed through a variety of sources and delivery methods such as education events hosted by the local program or state organization, program-approved externally provided opportunities (in person or online), National CASA webinars, program approved books and videos. To encourage a diverse learning experience, no more than four (4) hours of continuing education should be completed by reading books/articles.

- k) Advocate should be able to speak and write English
- l) Advocates should have access to a computer and be computer literate
- m) Advocates must have a valid Driver's license or state issued ID
- n) Verbally take an oath in court when during swear-in by the Judge:
 - "I, (your name) / do solemnly swear / that to the best of my skill and ability / I will perform the duties assigned to me / by statute as Guardian ad Litem / I will abide by the Orders of the Court / and ensure that orders are properly executed / I will respect the confidentiality / of all information or reports revealed to me / Unless entitled by law / or authorized by Court Order / I will not communicate to any person / anything I learn or obtain / from any report or record maintained / I will faithfully protect and promote / the best interest of each child I represent / until formally relieved / of this responsibility by the Court".

A qualified CASA volunteer who transfers to CASA Child Advocates of Montgomery County from another program must complete the full application and screening process. They must complete the full pre-service training for this county. It is important for all volunteers to understand the background and needs of children served by the local program, local court, laws, program policies, investigation and report writing.

If a volunteer has been inactive for more than one year, the volunteer will need to complete the pre-service training again before being assigned to another case. For this document, inactive means the advocate has not been assigned to a case in the last year.

CASA does not accept or retain Advocates if they or an immediate family member have been convicted or have prior charges or have charges pending for a felony or misdemeanor involved in a sex offense, violent act, child abuse or neglect, or related acts that would pose risks to children or to the CASA program's credibility. Advocates must immediately notify CASA of any charges of Class B misdemeanor or higher and of any criminal conviction.

Advocates are prohibited from having direct or indirect financial interest in the assets, leases, business transactions or professional services of the program.

Advocates shall not serve as foster parent for any child whose conservatorship is through CPS unless the Advocate is related to the child.

Advocates shall not be related to any parties or litigants involved in the case or are employed in a position and/or agency that might result in a conflict of interest.

Advocates shall not serve as CPS mediators.

Advocates should never engage in anything that could decrease the perception of their objectivity in their case.

Each volunteer will sign an Acknowledgement that they have read and understand the Advocate Policies and Procedures, and they will receive a copy of the Advocate Policies and Procedures. This acknowledgement is retained by the program in the volunteer's record.

1.2 Child Abuse, Non-Violent Verbal/Non-Verbal Disciplinary Methods

Rarely will an Advocate be faced with a situation where it is appropriate to discipline a child. However, it is reasonable to assume this situation may occur. Therefore, CASA takes the following position regarding disciplinary methods.

It is expected that CASA Advocates will comply with all laws regarding child abuse as specified in the Texas Family and Criminal Codes. Furthermore, CASA does not endorse or condone any form of violent disciplinary methods toward children. Physical discipline may not be used by anyone representing CASA under any circumstance. Using language or mode of speech that is degrading or embarrassing (i.e., abusive verbal communication) is not an acceptable means of discipline. Discipline must be constructive and educational in nature. Correction must be fair, reasonable, consistent, and related to the specific misbehavior. Discipline should be individualized and age appropriate. Discipline will never involve any physical or mechanical restraints.

Any incident of unacceptable verbal/non-verbal discipline (as described/defined above) of a child that occurs while conducting CASA business will be considered child abuse and appropriately reported to the Texas Department of Family and Protective Services. Any staff or Advocate who is alleged to have engaged in any form of child abuse will be reported to the Texas Department of Family and Protective Services and immediately placed on administrative leave for the duration of the investigation. If child abuse allegations are substantiated, the Advocate involved will be subject to immediate termination.

If an Advocate has reason to believe a child has been mistreated, that person has an obligation to comply with the Texas Family Code 261.101 regarding the requirement to report any incident of child abuse or neglect, or any situation in which the CASA volunteer has reason to believe that a child is in imminent danger. Child abuse can be reported to TDFPS at 1-800-252-5400. The Advocate shall also report these concerns to their CASA supervisor.

1.3 Identification

- a) The CASA program staff will provide all CASA Advocates with a copy of the Court Order of Protection assigning CASA Child Advocates of Montgomery County to the case and the Certificate of Acceptance to the case. The CASA Advocate should have these items in their possession when executing any of their roles and responsibilities as a CASA Advocate. All CASA Advocates will be given an identification badge upon completion of the training. All Advocates should show this badge to interested parties to validate the Advocate's involvement in the case and should always wear this badge when on CASA business.
- b) CASA Advocates should not use their personal physical address in any communication or correspondence related to the execution of their duties as a CASA Advocate. If the CASA Advocate is asked to provide his or her contact information, the Advocate should give the CASA office contact information. Should an individual request further information, the Advocate should refer him/her to the CASA program staff.
- c) Each CASA Advocate will be provided with an email address to be used for CASA business.

1.4 Public Access Statement

CASA will not allow public access to the information in the custody of CASA that relates to an Advocate's home address, home telephone number, social security number, or any information about their family members without written consent from the Advocate.

1.5 Conflict of Interest

A CASA Advocate should not be related to or otherwise acquainted with any party involved in his/her case or be employed in a position and/or agency that might result in a conflict of interest. A CASA Advocate should not enter into a business, service, or professional agreement with any party to the case to which he/she is currently assigned. This includes, but is not limited to, client families and attorneys.

1.6 Sexual Harassment and Discrimination

CASA will seek to maintain an environment within the program which is free from intimidation, discrimination, coercion, or harassment. Discrimination against a child or caregiver based on age, race, religion, national origin, ethnicity, color, sexual orientation, gender identity or gender expression, disability or physical challenge will not be tolerated. Discrimination against an Advocate based on age, race, religion, national origin, ethnicity, color, marital status, sexual orientation, gender identity or gender expression, disability or physical challenge will not be tolerated. In the event of a question, complaint or allegation regarding harassment or discrimination of any kind, the Advocate should speak with the CASA Supervisor. If the allegation involves the CASA Supervisor, the Advocate should speak with the CASA Program Director. If

the allegation involves the Program Director, the Advocate should speak with the CASA President/CEO. If the allegation involves the CASA President/CEO, then the Advocate should speak with the Chairperson of the CASA Board of Directors. Contact information is available in the CASA office. The matter will be investigated in a discreet and confidential manner and after consideration of the facts, appropriate action will be taken in the best interests of the Advocate and the program. Such action may include recommendation for counseling, disciplinary warnings, and termination.

1.7 Weapons

Advocates are prohibited from possessing firearms, weapons, ammunition, or explosives on the property of Child Advocates of Montgomery County, or while engaged in the duties or functions as employee, volunteer, or Board member of Child Advocates of Montgomery County. Currently active law enforcement agents are exempt from this policy.

1.8 Substance Abuse

Advocates are prohibited from being under the influence of, using, possessing, selling, or otherwise being involved with illegal drugs or alcohol while engaging in their role as a CASA Advocate. CASA reserves the right to randomly drug test any Advocate who is believed to be under the influence of a substance while performing his/her role as a CASA Advocate. The cost of this testing is paid for by CASA and the results are confidential.

1.9 Training

All CASA Advocates are required to complete 12 hours of continuing education training annually (pro-rated the first year based on the volunteer's date of swearing in). No more than four (4) hours shall be completed by reading books/articles.

CASA records training hours for a program year (9/1 - 8/31). In-service training opportunities may include, but are not limited to, cultural competency on an annual basis, disproportionality, disparity in outcome training, and recognizing abuse.

1.10 Speaking on Behalf of the Agency

Advocates are encouraged to speak about the program, in general, throughout the community. However, the Recruiting Manager must be informed of any speaking engagements the Advocates may wish to arrange on behalf of CASA, so the staff may assist with written materials or go with the volunteer to help with the presentation.

Advocates are prohibited from speaking about details of any case within the CASA program. Advocates are prohibited from speaking to the media about CASA, unless granted permission to do so from the CASA President/CEO. Failure to follow this policy can result in dismissal.

1.11 Immunity

CASA adheres to Texas Family Code 107.009 which states: (a) A guardian ad litem, attorney ad litem, or an amicus attorney appointed under the chapter is not liable for civil damages arising from an action taken, a recommendation made, or an opinion given in the capacity of guardian ad litem, attorney ad litem, or amicus attorney. (b) Subsection (a) does not apply to an action taken, a recommendation made, or an opinion given: (1) with conscious indifference or reckless disregard to the safety of another; (2) in bad faith or with malice; or (3) that is grossly negligent or willfully wrongful.

1.12 Access to Legal Counsel

CASA does not and will not appoint an attorney for an Advocate's personal use. CASA does not and will not provide legal consultation for an Advocate's personal use. CASA does not and will not participate in any legal activities in which a current, former and/or prospective Advocate is involved, unless subpoenaed by the court. CASA will monitor any legal case pertaining to a current, former and/or prospective Advocate, in the interest of preventing a risk to the credibility of CASA.

CASA does not provide access to legal counsel with relevant legal expertise to clarify the meaning of laws or regulations governing its program or operations.

1.13 Religion

Advocates will respect the beliefs of the child and/or family for whom they are advocating.

Advocates may not attempt to persuade a child or family regarding any religious belief or moral conviction.

1.14 Exception to Policies

On occasion, certain exceptions may be made to any of these policies at the discretion of the President/CEO.

1.15 Program Review

At least once in a two-year period, the CASA/GAL program conducts a review which includes assessment of the program goals, objectives, and outcomes as well as alignment with those of National CASA and Texas CASA that pertain to local CASA/GAL programs: Degree to which the program identifies and meets the advocacy needs of the children it serves, as assessed through surveys of volunteers, judges, and other key stakeholders.

Section 2 - Program Policies

The Program Policies specify the role and responsibilities of the CASA volunteer and are developed to align with the Texas Family Code 107.002 and align with the National CASA Association Core Model and Standards for Local CASA Programs.

CASA Child Advocates of Montgomery County integrates the following guiding principles into all aspects of program practices, policies, and procedures:

1. Recognize the importance of family preservation and/or reunification:
 - a. It is in a child's best interests to remain with their family of origin when safely possible.
 - b. The program acknowledges that children experience trauma when separated from their family of origin.
 - c. If a child is removed from their family of origin, it is in the child's best interests to be reunified with their family of origin as soon as safely possible.
 - d. If a child is removed from their family of origin, the child should be placed with a relative whenever safely possible and in the child's best interests.
 - e. Strengthening families, through recommendations for services, support, visitation, and communications, is in the child's best interests to achieve stability and/or reunification.
 - f. The program requires and demonstrates respect for the parents and all parties associated with the case.
 - g. The program ensures that information regarding the family's strengths is incorporated into reports to the court.
 - h. The program ensures that information regarding the child's wishes is incorporated into reports to the court.
 - i. When a court determines a child cannot be safely reunified with their family of origin consistent with legal mandates, another permanent placement is in a child's best interests.

2. Recognize the importance of diversity, equity, and inclusion:
 - a. All children regardless of age, race, ethnicity, national origin (ancestry), color, religion (creed), gender, gender expression, sexual orientation, disability or physical challenge, or socioeconomic status should be safe, have a permanent home and an opportunity to thrive.
 - b. The program acknowledges the existence of implicit bias and takes steps to minimize and/or eliminate implicit bias.
 - c. The program demonstrates an understanding of disproportionality impacting children who have experienced abuse or neglect.

2.1 Advocate-Child Relationship

The Advocate is responsible for establishing a relationship with the child that promotes the child's wellbeing and enhances the Advocate's objectivity while serving as the Guardian ad Litem. To establish such a relationship, the Advocate is prohibited from the following:

- a) Introducing or identifying the child as a CASA child to anyone not professionally related to the child's case
- b) Involving the child with anyone who is not related to the child's case
- c) Taking the child to the Advocate's home or to the home of the Advocate's personal friends or family
- d) Taking the child to any location that is not pre-approved by the child's legal guardian, custodial agency and CASA program supervisor or director.
- e) Purchasing expensive gifts or providing significant material support to the child, family, or caregiver
- f) Accepting expensive gifts or significant material support from the child or family
- g) Giving legal advice or therapeutic counseling
- h) Making placement arrangements for the child
- i) Taking the child on an overnight outing
- j) Causing dependency for services that other agencies provide
- k) Transporting the child in the Advocate's car or on any public transportation, unless approved in advance, and in accordance with our current Transportation Policy. (It is not expected that all Advocates will transport children: if you are interested in this, see the attached Transportation Policy.)
- l) No CASA staff or volunteer shall provide housing or lodging for children in the physical custody of CPS, bathing facilities for children in the physical custody of CPS or provide supervision of a child overnight or for any shift while a child is in the physical custody of CPS.
- m) The CASA volunteer does not engage in the following activities: Any activities which are likely to result in a conflict of interest or expose the program or volunteer to criminal or civil liability.

2.2 Direct Services

Advocates shall not become inappropriately involved in a case by providing direct service delivery to any parties that could (a) lead to a conflict of interest or liability problems; or (b) engage in activities which are likely to result in conflict of interest or expose the program or Advocate to criminal or civil liability; or cause a child or family to become dependent on the Advocate for services that shall be provided by other agencies or organizations. Such activities may jeopardize the safety of the child, the integrity of the program, or the objectivity of the volunteer.

2.3 Length of Commitment

CASA Advocates are asked to commit to the CASA program for a minimum of twelve (12) months or until the case to which they are assigned is closed by the Child Protection Court.

2.4 Supervision

- a) CASA Advocates are assigned a CASA Case Supervisor.
- b) Supervisors provide timely and thorough guidance to volunteers through contact at least once per month by video conference, telephone or in person meeting. The supervisor will review the issues or progress of the case and the needs of the children in these meetings.
- c) The Supervisor conducts a review of the case and the volunteer's performance as a CASA volunteer on an ongoing basis and as a component of case closure.
- d) Each CASA Advocate is responsible for submitting information to their supervisor monthly and upon request.
- e) Each CASA Advocate is responsible for submitting a court report to the Case Supervisor two weeks before the court date. The supervisor will not change or alter the court report without the knowledge and documented agreement of the Advocate.
- f) CASA Advocate shall discuss any recommendations to the court with the supervisor prior to court. Failure to adhere to this policy can result in the dismissal of an Advocate.

2.5 Professional Conduct

CASA Advocates are expected to always conduct themselves in a professional manner. Personal and Professional conduct should uphold the credibility and positive reputation of CASA in the courtroom and community. CASA Advocates should dress appropriately for court and other meetings the CASA Advocate needs to attend.

2.6 Advocate Minimum Expectations

In a timely manner after appointment, the advocate will obtain firsthand a clear understanding of the needs and situation of the child by reviewing all relevant documents and records, including medical, psychological, and school records, and interviewing the child, parents, social workers, educators, child welfare service providers, Attorney ad Litem, any foster parent, and other persons to determine the facts and circumstances of the child's life situation.

1. The Advocate will identify and advocate for the best interest of the child, considering the child's expressed objectives without being bound by those objectives, by conducting an ongoing review of all the relevant documents and records and through monthly contact or documented attempts with the parents (as available and permissible), caregivers, case managers, and program staff.

2. The Advocate will maintain confidentiality of all issues and records of the case, returning all case files to the CASA program after the case is closed and deleting all electronic records related to the case. The Advocate will follow secure transmission policies in all email correspondence that contains confidential information throughout the working of the case.
3. Communicate with DFPS caseworker after appointment and at least once per month for the duration of the case.
4. Communicate with the Attorney ad Litem at least quarterly for the duration of the case.
5. Have regular and sufficient in-person contact with the child where they live to ensure in-depth knowledge of the case and make fact-based recommendations to the court.
6. The CASA volunteer shall visit with the child at least one time per month at a minimum. If the child is placed 60 miles or less from the Advocate's home, these visits must be face-to-face in person visits each month. If the child is placed 61 or more miles away, visits in certain months can include virtual visits as outlined below.
 - 6a. 50% of these visits each year must be where the child lives.
7. If the child is placed between 61 and 120 miles away, then CASA will meet face-to-face in person with the child at a minimum every other month and have a virtual visit in each month when the child is not visited in person.
 - 7a. 50% of these visits each year must be where the child lives.
 - 7b. For a visit to count as a "virtual visit" an Advocate must be able to see the child; options include but are not limited to, the use of Facetime, Microsoft Teams, Zoom, Google Duo, WhatsApp and any other medium where the Advocate and child and see each other through technology.
8. If the child is placed between 121 and 300 miles away, then CASA will meet face-to-face in person with the child at least once every three months and have a virtual visit in each month when the child is not visited in person.
 - 8a. 50% of these visits each year must be where the child lives.
 - 8b. For a visit to count as a "virtual visit" an Advocate must be able to see the child; options include, but are not limited to, the use of Facetime, Microsoft Teams, Zoom. Google Duo, WhatsApp and any other medium where the Advocate and child can see each other through technology.
9. If the child is placed 301 miles or more away, then CASA will meet face-to-face in person with the child at least once every 6 months and have a virtual

visit in every other month when the child is not visited in person.

9a. 50% of these visits each year must be where the child lives.

9b. For a visit to count as a “virtual visit” an Advocate must be able to see the child; options include, but are not limited to, the use of Facetime, Microsoft Teams, Zoom, Google Duo, WhatsApp and any other medium where the Advocate and child can see each other through technology.

10. Note: If the child is placed over 120 miles away, Courtesy CASA can be utilized for 50% of the quarterly or bi-annual face-to-face in person visits. If Courtesy CASA is requested, or utilized, it is highly encouraged that they call the Advocate or CASA staff when on their visit to facilitate a virtual call between all parties.
11. In addition, for any child not seen by an Advocate within the prescribed time, without an approved exception, program staff are required to see the child within 10 days.
12. Visit requirements are minimum expectations but Advocates are encouraged (not required) to have additional contacts with children they serve to promote connection. Acceptable types of additional contacts may include video calls, writing letters, sending cards or emails.
13. Meet in-person with the child's primary placement provider in a timely manner after placement occurs and communicate with the placement provider at least once a month thereafter for the duration of the assignment of the child's case.
14. Advocate for the child's best interest in the community by quarterly interfacing with mental health, medical, legal, educational, and other community systems, subject to confidentiality limitations, including the medical care provided to the child and eliciting, as appropriate, the child's opinion on the medical care provided to assure the child's needs in these areas are met. *i.e., psychologist, psychiatrist, doctor/nurse, educators, daycare providers, attorneys.* Determine the child(ren)'s permanent plan, access the educational portfolio and health passport and make recommendations regarding permanency, and education and medical services, as appropriate.
15. Seek information about whether a permanency plan has been created for the child and make recommendations concerning permanency that encourage the permanent placement of children with their families, relatives, or through timely placement with adoptive families.

16. Participate in all scheduled case related meetings. *i.e., ARD, FGC, PC, COS, informal conferences, mediations.* Participate in all scheduled case reviews with program supervisory staff.
17. Seek cooperative solutions by acting as a facilitator among parties maintaining communication with the child's parents, family members, attorney ad litem, teachers, and other service providers as applicable. Collaborate and coordinate with legal, child welfare, and other partners to ensure service provision that is in the child's best interests, following all applicable confidentiality requirements.
18. Appear at all court hearings to advocate for the child's best interest and permanency. Provide factual information through court report and testimony when necessary, making recommendations about the child's needs and best interests and for specific appropriate services for the child and, when appropriate, the child's family including referrals to existing community services. Provide written court report for all required hearings. *i.e., Court reports: status, initial permanency, permanency, permanency after final order; Recommendations: permanency/concurrent plans, services, visitation*
19. On each case assigned CASA Supervisor and CASA volunteer will communicate at least once per month to update records, contact logs, and participate together in scheduled case conferences as well as to review the issues or progress of the case and the needs of the children.
20. Inform the court promptly of important developments in the case through appropriate means as determined by the court rules and statute.
21. Monitor the child to ensure the child's safety and to advocate against unnecessary relocations of the child to multiple temporary placements.
22. Monitor implementation of service plans and court orders to assure court-ordered services are implemented in a timely manner and that review hearings are held in accordance with the law.
23. For a child at least 16 years of age, ascertain whether the child has received the following documents: a certified copy of the child's birth certificate, a social security card or replacement card, a driver's license or personal identification certificate, and any other personal document Department of Family and Protective Services determines appropriate.
24. Seek to elicit in a developmentally appropriate manner the name of any adult, particularly an adult residing in the child's community, who could be a relative or designated caregiver and/or connection for the child and

immediately provide the names of those individuals to the Department of Family and Protective Services.

25. Participate in a minimum of twelve (12) hours of ongoing training per year that is relevant to being a CASA volunteer (pro-rated the first year based on the Advocate's date of swear in).
26. Refrain from introducing or involving the Advocate's family members or friends not appointed to the case with the child or any other persons involved in the case.
27. Document in Optima all visits and contacts with associated parties in the case (CPS Caseworker, attorneys, caregivers, and supervisor). Enter all casework time and mileage and training hours in Optima in the month they occurred.
28. The criteria listed above are from the Texas CASA minimum expectations requirements and CASA Child Advocates of Montgomery County policies. Should these standards change, we reserve the right to change the minimum expectations for volunteer service.

2.7 Case Conflict

It is rare for an Advocate and Supervisor to be in conflict regarding their positions on a case; however, at times this situation arises. When an Advocate and Supervisor have a conflict regarding the handling of a case, reporting of information or the recommendations being made to the court that cannot be resolved among themselves, the Program Director will act as a mediator to resolve the conflict. The Program Director will make the final decision after consulting with the Assistant Program Director.

2.8 Case Closure

The role of a Court Appointed Special Advocate is by nature a transitory one. An effective Advocate recognizes that abused and neglected children face many unpredictable transitions in their lives. To lessen the negative impact of such transitions, an Advocate is responsible for providing a healthy transition for the child/children when CASA is dismissed from the case. It is CASA's expectation that each Advocate will carefully plan and execute their final contact with their CASA child/children, and that their exit from the case is not abrupt. CASA expects Advocates to cease contact with the child/children after their case is closed, unless the family of final placement or an aged-out youth requests continued contact. An Advocate's Case Supervisor can provide resources to assist in smooth transitions for children. Advocates shall return any physical case related documents to the CASA office immediately upon closure of the case and delete any electronic records. The Case Supervisor

will conduct a review of the case, and an evaluation of the volunteer's work at case closure. The Advocate will enter all final case related contacts in Optima in a timely manner after case closure.

2.9 Grounds for Immediate dismissal from a case:

- a) Taking action that endangers the child or is outside the role or authority of the CASA program.
- b) Engaging in ex-parte communication with the court
- c) Violating a program policy, court rule or law
- d) Failing to complete required pre-service training or 12 hours of continuing education training each year.
- e) Failing to effectively carry out assigned duties which may include not following program direction or guidance.
- f) Falsifying the application or misrepresenting facts during the screening process
- g) Existence of child abuse/ neglect allegations
- h) Existence of a conflict of interest which cannot be resolved

All concerns in this area will be brought by the Supervisor to either the Program Director or Assistant Program Director and after verifying the concerns, the Advocate will be dismissed.

A volunteer, employee or board member who has abused or neglected any position of trust or violated the policies governing ethical conduct or otherwise created a negative image for the CASA may be dismissed immediately.

2.10 Assignment of Cases

- Cases are accepted and assigned without discrimination based on age, race, ethnicity, national origin, color, religion, gender, gender expression, sexual orientation, disability, or physical challenge.
- Advocates are assigned to children with consideration to the experience, knowledge, skills, and prior performance as a CASA volunteer, the nature and difficulty of current assignments, and the availability of the volunteer. Advocates shall not be assigned to more than two cases at a time unless they have exception documentation and will not be assigned more than five cases under any circumstances.

2.11 Maintain Complete Records

- Advocates must maintain complete records about the case they are assigned to, including appointments, interviews and information gathered about the child and the child's life circumstances. Case files in Optima must include complete documentation that minimum expectations of service have been met.

- Minimum expectations require each Supervisor to maintain verbal contact with all assigned CASA volunteers at least once per month **in person, by phone or virtual**. Should an Advocate not respond with the required documentation on their case within that month, the Supervisor must document their efforts to communicate with the Advocate in Optima in the contact log and set up a face-to-face meeting.
- During that face-to-face meeting a plan is established between the Supervisor and Advocate as to how this will be corrected and how the Advocate will submit their documentation going forward. The goal is to assist the Advocate in being successful in their advocacy and maintain the connection for the child as well as meet minimum expectations as set by Texas CASA.
- Should an Advocate fail to submit any documentation in the second month, the Advocate will be removed, and a new Advocate will be assigned to the case.
- If an exception is made to this, it must be approved by either the President/CEO or the Program Director.

2.12 Pictures/Photos

Photos of children in open cases are only allowed when requested or required by the court to be included with the court report or when written permission is obtained from the legal guardian or the young adult, if 18 years of age or older.

- All pictures must be uploaded and stored in Optima. Pictures must be destroyed after uploading into Optima and removed from any personal devices.
- The use of children's photos in active cases is prohibited in social media, marketing, or for personal use. Photos can only be used when the case is closed and with written permission from the legal guardian or the young adult, if 18 years of age or older.

2.13 Crime Victim's Compensation Claim (VOCA) Procedures

In providing CVC benefit claims, the following procedures have been established:

- *In cases where CASA has been appointed, the file will be reviewed to determine if criminally injurious conduct has occurred and if the wrongful acts have been reported to law enforcement. CASA will work with CPS to obtain a copy of the filed police report.*
- *CASA will check with the individual caseworker, as agreed with CPS, to determine if the CVC claims application/packet has been completed.*
- *CASA will explain to the permanent caregiver or family that the child is eligible and ensure the application is filled out and submitted to The Office of the Attorney General – Crime Victims' Compensation Program.*
- *Prior to permanent placement and case closure, CASA will follow-up with family or permanent caregiver to ensure that they have been provided with*

the necessary CVC documentation. Referral to the District Attorney's Victim Assistance Coordinator will also be provided.

- *CASA staff and Advocates will receive training from OVAG as to changes in the law regarding eligibility, and/or the proper claim procedures.*

2.14 Volunteer Safety

CASA Advocates should not put themselves in personal jeopardy while performing their volunteer role and carrying out their responsibilities. If a CASA Advocate is uneasy about entering a neighborhood or a particular building, or about meeting with a particular party, the Advocate should discuss these concerns with his/her Case Supervisor to make other arrangements. The CASA Case Supervisor may attend the meeting with the Advocate, to help relieve such apprehension.

We recommend that Advocates give the CASA office phone number for contact and only give their personal number at their discretion.

2.15 Confidentiality

CASA Advocates often work with confidential, proprietary information and materials. Confidential information (and all documentation and information relating thereto) will be kept strictly confidential by Advocates as per their oath. All printed confidential documents should be marked "*Confidential*." It will be the recipients' responsibility to control and return the documents.

Confidential Information:

It is important that each Advocate can identify what information is considered confidential. Listed below are items which must be kept confidential:

- Case files
- Donor, Advocate, board member, staff personnel records
- Any information related to the cases assigned to CASA and any information to the families and children served by CASA Advocates. This includes but is not limited to the following: medical and psychological reports or information regarding the child and/or their family members.
- Any CASA documentation such as staffing, or discussions related to information that may be included in a case file
- Attorney's offices, staff/Advocate generated court reports and communications with attorneys
- Any documents from CPS, law enforcement, the District Attorney's offices, the County. This includes but is not limited to the following: the name and identifying information of the individual who initially reported abuse and neglect to CPS.
- Any printed document (hard copy or electronic media) shall be marked "Confidential"

Precautions for Individuals Working with Confidential Information:

Maintaining Confidentiality:

- Keep all confidential documents out of view and/or locked away in your desk
- Close all doors when confidential discussions occur
- Confidential information on your personal computer should be password protected and never left open when you step away. Confidential documents should not be stored on your personal hard drive.
- CASA central case file records are not allowed to leave the CASA office. The Advocate must maintain the security of all confidential records when in their personal possession and must maintain the security of those records when they are not in the person's possession, such as when they must be temporarily left at home or in a vehicle. Case records and notes shall be secured and kept private and inaccessible to unauthorized persons.

Maintaining Confidentiality when Printing, Copying and/or Disposing:

- Monitor the printer when printing confidential documents. Do not leave such print jobs unattended.
- Remove all confidential documents from the copy machine. In the event of a jam, make sure all confidential papers are removed.
- Shred confidential documents at the CASA office.

Maintaining Confidentiality on the Telephone:

- Close doors when confidential conversations are being made on the phone.
- All conference calls where confidential information may be discussed should be conducted behind closed doors.
- Individuals should be careful what they say when leaving voice mail messages that may contain confidential information.
- Be discreet in communications with others to ensure that unauthorized disclosures do not occur.

Maintaining Confidentiality when Mailing:

- Confidential mail sent by regular mail or courier should be sent in sealed envelopes and marked "Confidential."
- Mark all confidential information mailed from the CASA office as "Confidential."

Maintaining Confidentiality When Emailing:

- Before sending any confidential information via email, individuals should make sure the intended recipient is the sole user of the address.
- Discretion should be used when sharing confidential information by email.

- CASA programs are required to employ encryption to keep confidential information secure during electronic transmission.
- Optima: Court reports should be uploaded by the Volunteer Supervisor or Volunteer into Optima for reviewing, amending, or approving purposes. Optima is a secure database that is user-specific password protected. Therefore, it meets the definition of secure transmission.
- The Advocate will follow the secure transmission standards as set forth by Texas CASA in all email correspondence. All emails shall have the following confidentiality notice located at the bottom of each email.

CONFIDENTIALITY NOTICE: The content of this email is confidential and intended for the recipient specified in this message only. It is forbidden to share any part of this message with any third party without the written consent of the sender. If you have received this message in error, please reply to this message and follow with its deletion so we can make sure such a mistake does not occur in the future. Unauthorized interception of this email is a violation of the Electronic Communications Privacy Act, 18 U.S.C. §2510-2521.”

Maintaining Confidentiality in Optima and other electronic information sources

- Case data may not be put on a thumb drive (which can be easily misplaced)
- All records from Optima should be deleted from your personal device after viewing.

Maintaining Confidentiality When Faxing:

- When using a fax machine to transmit confidential information, plan for the recipient to be available to monitor the fax machine to retrieve the document.
- Verify all fax numbers prior to sending information by facsimile and include the notice of confidentiality with all faxes:

“CONFIDENTIALITY NOTICE: This communication and any attachments may contain confidential and privileged information for the use of the designated recipients named above. This transmission is strictly confidential. If you are not the intended recipient of this message, you may not disclose, print, copy or disseminate this information. If you have received this in error, please contact us immediately upon receipt.”

Maintaining Confidentiality with Social Media:

- No pictures of CASA child, no identifying information about a CASA child/case/court hearing will be placed on social media – Facebook, Instagram, Twitter, etc.
- Advocates will not discuss frustration with CPS, foster parent, kinship, child, CASA, the court, or the “system” on social media.

Maintaining Confidentiality with Texting:

- No identifying information may be included in text messages
- Children may only be identified by initials
- All text messages must be deleted at the conclusion of the case

Section 3 - Transportation Policies

It is solely the CASA Advocate responsibility that all documents required to transport are in place and on file at the office in Conroe, Texas. This Program may be halted at any time by the President and CEO or Board of Directors.

It is recognized by Child Advocates of Montgomery County that a limited subset of youth in the Foster Care system and regularly seen by their Advocates may benefit from extra time and attention given by their volunteers and therefore, may grant those volunteers permission to transport children under limited conditions and certain guidelines.

Transportation of children is not mandatory. It is recognized that many children will be ineligible to be transported by CASA and that some Advocates will not be comfortable with assuming the liability involved. It is expected that transporting children will be an exception rather than the rule and will be a very small part of CASA's work.

It is recognized that the roles of Children's Protective Services (CPS) and CASA are different. This should be respected and never confused or blurred. CPS works with all foster care children, under many conditions and transports children for many reasons. CASA's role in transporting ideally would be limited to the Goals and Conditions described below, but at the Program Directors' discretion CASA Advocates may transport for other reasons if CPS and CASA agree on the need and conditions and sign off accordingly.

3.1 Goal of Transporting

The goals of transporting children are:

- To develop and enhance the trust and bond between the Advocate and the child.
- To foster open and more effective communication; and
- To give the child a sense of a "normal life" experience.

It is not the goal of CASA to provide routine transportation for which CPS or the caretaker should be responsible.

Common sense and good judgement must be used in every situation and the child's welfare and safety must always be paramount.

3.2 Qualifying to Transport

- An Advocate may qualify to transport for a specific child. Permission for each child will be assessed separately.
 - No child under 6 will be transported. Children between 6-12 years of age should be harnessed in the backseat of the vehicle. Children 6–7-year-old must ride in an approved car seat.
 - No DFPS Intense level child will be transported by CASA.
- The Advocate must complete CASA's Transporting Children training.
- The Advocate must provide:
 - A copy of the current driver's license for the CASA office.
 - A current copy of their driving record from the Texas DMV. A copy will be kept on file in the CASA office. The driver also must not have had more than two moving violations or accidents within the past three years and may never have been convicted of a DWI or driving under the influence.
 - Proof of current automobile liability insurance of at least \$100,000 Bodily Injury, each person and \$300,000 Bodily Injury, each occurrence and \$100,000 Property Damage, each occurrence; including a copy of the coverage, the declarations page and agent information in the automobile. Copies will be kept on file in the CASA office and must be updated every six months. This is the Advocate's responsibility.
 - Proof that car(s) used for transport will be in compliance with Texas vehicle inspection requirements. The vehicle used shall have an up-to-date safety inspection from the State of Texas prior to transport and possess airbags and safety harnesses.
- The Advocate must sign the Volunteer Transportation Contract/Request Form, indicating agreement and compliance with the policy.
- The Advocate must have been on the case for at least 90 days.

3.3 Approvals and Notifications

- The Advocate (together with Case Supervisor) must gain written approval from the CASA Case Supervisor, the CASA Program Director, the child's legal guardian or custodial agency, and CPS Supervisor to transport a specific child.
- The Advocate must have written approval in advance from the CPS Case Supervisor for each specific instance of transport.
- The Advocate will notify CPS and the Residential Treatment Center (RTC), Foster Parent or Primary Caregiver that an individual in their facility or home will be driven to an identified location and returned after the event or outing. If this is done by phone rather than in writing, the Advocate will make that note for the records.
- The Advocate will keep a log of all CASA transports and enter that information in Optima under the contact logs.

- A signed copy of the Volunteer Transportation Contract/Request Form should be taken with the Advocate while performing the visit.

3.4 Specific Instance of Transporting

- Transporting must support the child's plan of service.
- All destinations must be public places. A child may never be taken to any private residence other than the child's current placement, including the Advocate's home.
- There will be no overnight transporting.
- There must be two adults in the car with the child at all times. A non-Advocate must have completed Helping Hearts training and a background check (See 1.1) and must sign a confidentiality agreement for the specific case.
- No non-approved individuals will be in the vehicle with the children.
- The child may never be transported by motorcycle or scooter.
- Every occupant of the vehicle must always wear seatbelts and shoulder harnesses while the vehicle is moving.
- The driver may not text or talk on a cell phone while the vehicle is moving.
- No smoking is allowed at any time while the child is in the automobile.
- Advocates or other individuals in the vehicle are prohibited from carrying weapons, including knives, firearms, or ammunition of any kind while transporting. This is in concordance with Texas CASA Standard 10.F.6.
- Automobile safety is a priority, and the volunteer will report immediately to the President and CEO if there is an accident or moving violation of any kind.
- The volunteer will obey all traffic rules including seat belt and child car seat laws and posted speed limits.

It is the CASA Advocate's responsibility that all documents required to transport are in place and on file at the CASA office. The CASA Program Director, Assistant Program Director, and Case Supervisors will make transport decisions based on each individual case and may for any reason rescind or deny approval to transport a child. Any willful breach of this policy and procedure will be taken very seriously by the CASA leadership and may result in the volunteer transporter being removed from the CASA program.

Prior to any transport, it is recognized that the CASA Advocate transporting any child has read this document and understands the risks and limitations of this policy and procedure, does this in a voluntary capacity, and is knowledgeable of the potential personal risk and accepts all personal and legal liability.

Section 4. – Social Media Policy

CASA Child Advocates of Montgomery County (CASA) recognizes the importance of the Internet in shaping public thinking about our organization. We also recognize the importance of our employees, volunteers and donors joining in and helping shape industry conversation and direction through interaction on social media. CASA is committed to supporting honest, transparent, and knowledgeable dialogue on the Internet through social media.

As with anything, we need to take some precautions when using social media tools connected with CASA Child Advocates.

4.1 Social Media Roles: Who Does What?

Establishing a CASA presence on a public social network (Facebook, Twitter, YouTube, LinkedIn, etc.) must be authorized beforehand by the President & CEO. We will only establish presence on an additional site when we have:

- a) The resources to consistently maintain a dialog appropriate for that site;
- b) A plan for the site's use, which will be held in our Social Media Plan;
- c) The chosen social media site aligns with our mission; and
- d) The outreach will increase engagement with a specified, desired audience.

CASA will maintain only one CASA Child Advocates of Montgomery County on any social media site used. Event pages and groups may be added as subsets of the primary site with approval of the Marketing and Communications Director.

As an exception, and on a project-by-project basis with specific, advance approval of the President & CEO, it may be possible to establish an additional site for a specific purpose. This will be a rare exception to the general policy of CASA having only one site on each media.

All official social media accounts are managed by the staff Marketing and Communications Director, including upkeep of accounts and managing ongoing updates. One additional staff member will have administrator rights to monitor accounts and in case of emergency situations. The Marketing and Communications Director, in discussion with the President & CEO, may grant and/or revoke access to other members of staff to administer groups on the platforms and to post content. We reserve the right to block, filter, or restrict by any means any user's access to a social media site without notice for any reason.

Any paid or in-kind social media advertising must be approved by the Marketing and Communications Director.

Any content related to fundraising, recruitment, or programming will be approved by the appropriate Director before going public.

4.2 What Should You Say Online?

These guidelines apply to all posting on CASA sites, including both those posting officially as “CASA Child Advocates of Montgomery County”, and those posting on the sites as staff, friends, volunteers, donors and visitors.

Think of CNN, your mother and your boss. Do not say anything online that you would not be comfortable seeing quoted on CNN, being asked about by your mother or having to justify to your boss.

Respect confidentiality. Be very careful not to discuss information that is internal confidential, and/or sensitive, including organizational finances, volunteer information, etc. If in doubt - ask the Marketing and Communications Director or the owner of the information you want to share

Give credit when you are influenced by another writer, or when you use someone else’s photos or art. Properly cite sources. Provide a link to the original content and use the author’s/artist’s name whenever possible. Use only photos you have taken yourself or have permission to use.

Share your opinion appropriately. Be interesting and authentic. Use normal language that you would be fine in a public forum like school meeting.

Disagreements are central to growing ideas, but don’t attack anyone personally. Don’t spread gossip, hearsay or assumptions. Keep it clean.

Be safe. Don’t publicly post anything you wouldn’t tell a stranger on the street. Opinions and ideas belong in a public forum, your last name, passwords or phone numbers do not!

Make it look good. Post *pictures* with comments whenever appropriate and relevant, in order to keep the sites *looking* good.

4.3 Monitoring

The Marketing and Communications Director or his/her delegate will be responsible for monitoring social media channels daily and will quickly address inappropriate messages or misuse. Inappropriate content includes spam, advertising, offensive statements, inaccurate information, foul language, or unconstructive criticism.

4.4 Responding to Negative Comments

We are not overly concerned about negative conversations. We will delete negative comments only if they are vulgar, offensive, threatening, or violate confidentiality.

We will respond to negative or inaccurate posts if response is warranted. We will correct misinformation, but not engage in heated arguments.

Media inquiries coming through social media should be referred to the President & CEO or Marketing and Communications Director for an appropriate response.

When disagreeing with others' opinions, remain appropriate and polite. If you find yourself in a situation online that looks as if it's becoming antagonistic, do not get overly defensive and do not disengage from the conversation abruptly. Ask our Marketing and Communications Director for advice on how to disengage from the dialogue in a polite manner that reflects well on the CASA.

If the community steps in to correct inaccuracies or defend the institution, there may be no need for an additional official response.

4.5 Responding to Positive and Neutral Comments

We want our social media sites to be a source of ongoing dialog. We will respond to any comments (on both the CASA site and other sites where CASA is mentioned) if, by responding, we can support an interesting and relevant dialog.

4.6 Privacy and Permissions

Employees should respect the privacy rights of their co-workers and will not disclose information about work-related events involving other employees of the CASA, its volunteers, donors and friends without obtaining their permission. Employees will not post photographs or images of co-workers, volunteers, donors or friends on any social media site without having their express permission to do so. We will protect our constituency by being responsible in how we collect, store, and use data from social media platforms, in compliance with CAN-SPAM laws, privacy policies of social media platform, CASA Confidentiality Policy, and CASA Communications Guidelines.

Stories which are posted on one of our social media sites may be used without additional permission in other formats, including but not limited to:

- The CASA website
- Thank you letters
- Social networking or social media platforms
- Presentations to supporters
- Brochures, direct mail, publications, etc.
- Video footage featuring our care for children

4.7 Personal vs. Professional

When staff communicates through social media, unless authorized to speak on behalf of CASA, they are representing themselves ... use a disclaimer. If you write anything *related to your work at CASA* on a blog or some other online space, make it clear that what you say there is representative of your views and opinions, and you are not presenting yourself as a spokesperson for CASA. Share these views under your name and not a pseudonym or fake account. Use a disclaimer such as: "I am an employee of CASA Child Advocates of Montgomery County; however, this is my personal opinion." or something to that effect.

Be mindful that using the statement above does not recuse you from any negative outcomes or consequences of your behavior on social media sites. Also, retweeting/sharing can easily be seen as a sign of approval of what you are relaying. Your personal opinions can be linked to/perceived to be linked to CASA.

Tips for sharing/endorsing:

- Share judiciously
- Customize your privacy settings
- Use quotes for what is said by others
- Make an introductory statement, such as "Hey, saw this interesting thing today"

Remember that what is said on social media platforms (including messaging, emails, and chats) is never truly private. No matter how restricted, anything on a screen can be captured and redirected to a wider audience.

Employees should not engage in any online conduct which:

- Creates a conflict of interest between them and CASA
- Creates a conflict with one of the CASA's program participants, or
- Otherwise harms the interests of the CASA.

If a minor program participant (any program participant under the age of 18) finds a staff member's personal social networking profile and requests to be linked as a friend, the employee must respectfully deny the request and block them from further contact. Employees or volunteers will contact their supervisor if a minor program participant attempts to contact them through the Internet, other than through an email address set up specifically for CASA email.

Section 5: Data Security Policy

5.1 Purpose

CASA Child Advocates of Montgomery County's Data Security Policy refers to our commitment to treat information of children, families, volunteers, donors, board members, employees, and other stakeholders and interested parties with the utmost care and confidentiality. With this policy, we ensure that we access, create, maintain, receive, use, disclose, transmit or destroy confidential information in a secure fashion that protects against any reasonably anticipated threats or hazards to the security or integrity of such information or unauthorized uses.

5.2 Scope

This Data Security Policy applies to all child, case, volunteer, donor, board member and employee data. Therefore, it applies to every server, database, and I.T. system that handles such data, including any device that is regularly used for email, web access, or other work-related tasks. Employees of CASA Child Advocates of Montgomery County must follow this policy. Contractors, consultants, partners, and other external entities are also covered. Generally, this policy refers to anyone we collaborate with or who acts on our behalf and may need occasional access to data.

5.3 Policy

a. General

- CASA Child Advocates of Montgomery County will provide all employees, volunteers, and contracted third parties with access to the information they need to carry out their responsibilities as effectively and efficiently as possible.
- Each user shall be identified by a unique user ID so that individuals can be held accountable for their actions.
- The use of shared identities is permitted only where they are suitable, such as training accounts or service accounts.
- Each user shall read this Data Security Policy and sign a statement that they understand and agree to abide by its provisions.

- Records of user access may be used to provide evidence for security incident investigations.
 - Access shall be granted based on the principle of least privilege, which means that each program and user will be granted the fewest privileges necessary to complete their tasks.
- b. Access Control Authorization
- Access to company I.T. resources and services will be given through the provision of a unique user account and password.
 - Passwords are managed by through Microsoft 365. Requirements for password length, complexity, and expiration are as follows:
 - i. Length: 8 characters minimum and 16 characters maximum
 - ii. Strong passwords only, requires three out of four of the following: lowercase characters, uppercase characters, numbers (0-9), symbols
 - iii. Expiration: Passwords are required to be changed every 90 days
 - Role-based access control will be used to secure access to all file-based resources.
- c. Network Access
- All employees and contractors shall be given network access in accordance with business access control procedures and the least-privilege principle.
 - Staff and volunteers will be assigned a CASA email address. This will allow the volunteer access to Microsoft 365 and maintain confidentiality needed for emailing confidential information.
 - CASA Child Advocates of Montgomery County will maintain an updated, complete, accurate list of Authorized Users.
 - i. Terminated employees or those no longer authorized to handle Texas HHS confidential information will be removed from the list of Authorized Users.
 - CASA Child Advocates of Montgomery County does not allow remote access to company networks.
 - Segregation of networks shall be implemented as recommended by I.T. Support. Network administrators shall group together information services, users, and information systems as appropriate to achieve required segregation.
 - Network routing controls shall be implemented to support the access control policy.
- d. User Responsibilities
- All users must lock their screens whenever they leave their desks to reduce the risk of unauthorized access.
 - Passwords will be locked after ten (10) failed attempts
 - All computing devices that access or store confidential information will lock after 15 minutes of inactivity.

- All users must keep their workplace clear of any sensitive or confidential information when they leave.
 - All users must keep their passwords confidential and not share them.
 - Before sending any confidential information via electronic mail, individuals must make sure the intended recipient is the sole user of the address.
 - Discretion must be used when sharing confidential information by electronic mail since it can be accessed fairly easily by experienced users or forwarded.
- e. Application and Information Access
- CASA Child Advocates of Montgomery County workforce and contractors shall be granted access to the data and applications required for their job roles.
 - CASA Child Advocates of Montgomery County workforce and contractors shall access sensitive data and systems only if there is a business need to do so.
 - CASA Child Advocates of Montgomery County Leadership Team will grant permission or deny individual rights of access for the workforce.
 - Only authorized users with up-to-date privacy and security training, and with a reasonable and demonstrable need to use, disclose, create, receive, maintain, access, or transmit the Texas HHS confidential information are permitted to carry out an obligation under the Data Use Agreement for an authorized purpose, unless otherwise approved in writing by a Texas HHS agency.
 - Sensitive systems shall be physically or logically isolated to restrict access to authorized personnel only. This is protected with CASA Child Advocates of Montgomery County's Microsoft 365 membership.
- f. Access to Confidential or Restricted Information
- Access to data classified as "confidential" or "restricted" shall be limited to authorized persons whose job responsibilities require it, as determined by this Data Security Policy or by CASA Child Advocates of Montgomery County Leadership Team.
 - The responsibility to implement access restrictions lies with CASA Child Advocates of Montgomery County Leadership Team and I.T. Support.
 - Disclosure of confidential information is limited to the minimum that is necessary to fulfill the authorized purposes.
 - CASA Child Advocates of Montgomery County and its workforce will comply with the applicable provisions of HIPAA and other laws referenced in the DUA relating to creation, receipt, maintenance,

use, disclosure, access, or transmission of Texas HHS confidential information on behalf of a Texas HHS agency.

- Disclosure of CASA Child Advocates of Montgomery County's work product done on behalf of Texas HHS, or publishing Texas HHS confidential information without express prior approval of the Texas HHS agency is prohibited.
- Attempts to re-identify or further identify de-identified Texas HHS confidential information or attempt to contact any individuals whose records are contained in the Texas HHS confidential information, except for an authorized purpose, without express written authorization from a Texas HHS agency is not permitted.

g. Training

- CASA Child Advocates of Montgomery County will provide training to its workforce who will handle confidential information.
 - i. Training will be annually, and within 30 days of a new hire date.
 - ii. Training must be completed prior to access being given to confidential information.

h. Destruction

- Confidential information will be destroyed or disposed of in one of the following, secure methods: shredding, burning, degaussing, hard drive overwriting, and/or physical destruction, such that the confidential information cannot be retrieved.

5.4 Technical Guidelines

The technical guidelines specify all requirements for technical controls used to grant access to data.

a. Access control methods to be used shall include:

- Auditing of attempts to log on to any device on the company network
- Windows NTFS permissions to files and folders
- Role-based access model
- Server access rights
- Firewall permissions
- Network zone and VLAN ACLs
- Web authentication rights
- Database access rights and ACLs
- Encryption at rest and in flight
- Deidentification of confidential information in accordance with HIPAA de-identification standards is deemed secure
- Network segregation

Access control applies to all networks, servers, workstations, laptops, mobile devices, web applications and websites, cloud storages, and services.

5.5 Reporting Requirements

This section describes the requirements for reporting incidents that happen.

- a. Monthly reports detailing all incidents shall be produced by I.T. Support and sent to CASA Child Advocates of Montgomery County Leadership.
- b. High-priority incidents discovered by I.T. Support shall be immediately escalated.
- c. Any actual or suspected incident, security event, or breach will be reported to the appropriate agency officials and/or authorities, including:
 - The Board of Directors and Texas CASA will be notified in writing no later than 5:00 p.m. on the second business day following discovery.
 - Immediate breach notification to Texas HHS agency, regulatory authorities, and other required individuals or authorities.
 - Following the documented breach response plan outlined in CASA Child Advocates of Montgomery County's Internal Confidentiality Policy, in accordance with applicable law.
 - Notifying individuals and reporting authorities whose Texas HHS confidential information has been breached, as directed by the Texas HHS agency.
- d. Any actual or suspected data security policy violation should be reported immediately to a LASO or TAC (President and CEO, Program Director, or Marketing and Communications Director).

5.6 Ownership and Responsibilities

This section describes who owns what and who is responsible for which actions and controls.

- a. The President and CEO, the Program Director, and the Marketing and Communications Director may all serve as the Privacy Official and Information Security Official, each of whom is authorized to act on behalf of CASA Child Advocates of Montgomery County and is responsible for the development and implementation of the privacy and security requirements.
- b. The President and CEO, the Program Director and the Marketing and Communications Director may all serve as the Local Agency Security Officer (LASO).
- c. The President and CEO, the Program Director and the Marketing and Communications Director may all serve as the Terminal Agency Coordinator (TAC).
- d. Users and workforce include everyone who has access to information resources such as employees, volunteers, contractors, consultants, and temporary employees.
- e. The Incident Response Team shall be chaired by the President and CEO and include the Marketing & Communications Director, the Program Director, other employees as necessary, and I.T. Support.
- f. CASA Child Advocates of Montgomery County will require updates to policies, procedures, and plans following major changes with use or

disclosure of Texas HHS confidential information within 60 days of identification of a need for update.

5.7 Enforcement

Any user found in violation of this policy is subject to disciplinary action, up to and including termination of employment. Any third-party partner or contractor found in violation of may have their network connection terminated.

CASA Child Advocates of Montgomery County requires cooperation with Texas HHS agencies or federal regulatory inspections, audits, or investigations related to compliance.

5.8 Definitions

a. Confidential Information: any communication or record (whether oral, written, electronically stored, or transmitted, or in any other form) provided to or made available to CASA Child Advocates of Montgomery County or that CASA Child Advocates of Montgomery County may create, receive, maintain, use, disclose or have access to on behalf of HHS that consists of or includes any or all of the following:

- Education records as defined in the Family Educational Rights and Privacy Act, 20 U.S.C. §1232g; 34 C.F.R. Part 99
- Federal Tax Information as defined in Internal Revenue Code §6103 and Internal Revenue Service Publication 1075;
- Personal Identifying Information (PII) as defined in Texas Business and Commerce Code, Chapter 521;
- Protected Health Information (PHI) in any form including without limitation, Electronic Protected Health Information or Unsecured Protected Health Information as defined in 45 C.F.R. §160.103;
- Sensitive Personal Information (SPI) as defined in Texas Business and Commerce Code, Chapter 521;
- Social Security Administration Data, including, without limitation, Medicaid information means disclosures of information made by the Social Security Administration or the Centers for Medicare and Medicaid Services from a federal system of records for administration of federally funded benefit programs under the Social Security Act, 42 U.S.C., Chapter 7;
- All privileged work product;
- All information designated as confidential under the constitution and laws of the State of Texas and of the United States, including the Texas Health & Safety Code and the Texas Public Information Act, Texas Government Code, Chapter 552.

b. Authorized User means a person:

- Who is authorized to create, receive, maintain, have access to, process, view, handle, examine, interpret, or analyze Confidential Information;

- For whom CASA Child Advocates of Montgomery County warrants and represents has a demonstrable need to create, receive, maintain, use, disclose or have access to the Confidential Information; and
- Who has agreed in writing to be bound by the disclosure and use limitations pertaining to the Confidential Information
- Authorized Purpose: the specific purpose or purposes described in the Texas HHS Contract for CASA Child Advocates of Montgomery County to fulfill its obligations under the Texas HHS Contract, or any other purpose expressly authorized by HHS in writing in advance.
- Workforce: employees, volunteers, trainees, or other persons whose performance of work is under the direct control of a party, whether or not they are paid by that party.
- Texas Health and Human Services (HHS): Texas Health and Human Services System, which includes the Texas Health and Human Services Commission and the Department of State Health Services.
- Health Insurance Portability and Accountability Act (HIPAA): The Health Insurance Portability and Accountability Act of 1996 is a federal law that required the creation of national standards to protect sensitive patient health information from being disclosed without the patient's consent or knowledge. The US Department of Health and Human Services (HHS) issued the HIPAA Privacy Rule to implement the requirements of HIPAA. The HIPAA Security Rule protects a subset of information covered by the Privacy Rule.
- Criminal Justice Information (CJI): data provided by FBI CJIS necessary for law enforcement and civil agencies to perform their mission.
- Criminal History Record Information (CHRI): a subset of CJI consisting of notations written and electronic evidence of an arrest, detention, complaint, indictment, information, or other formal criminal charge relating to an identifiable person. CHRI includes identifying information pertaining to the individual as well as the disposition arising from sentencing, correctional supervision, and release of any charges.
- Local Agency Security Officer (LASO): The primary Information Security contact between a local law enforcement agency and the CJIS Systems Agency under which this agency interfaces with the FBI CJIS Division. The LASO actively represents their agency in all matters pertaining to Information Security, disseminates Information Security alerts and other material to their constituents, maintains Information Security documentation (including system configuration data), assists with Information Security audits of hardware and procedures, and keeps the CSA informed as to any Information Security needs and problems.

- Terminal Agency Coordinator (TAC): Serves as the point-of-contact at the local agency for matters relating to CJIS information access. A TAC administers CJIS systems programs within the local agency and oversees the agency's compliance with CJIS systems policies.
- Access control list (ACL): A list of access control entries (ACEs) or rules. Each ACE in an ACL identifies a trustee and specifies the access rights allowed, denied, or audited for that trustee.
- Database: An organized collection of data, generally stored and accessed electronically from a computer system.
- Encryption: The process of encoding a message or other information so that only authorized parties can access it.
- Firewall: A technology used for isolating one network from another. Firewalls can be standalone systems or can be included in other devices, such as routers or servers.
- Network segregation: The separation of the network into logical or functional units called zones. For example, you might have a zone for sales, a zone for technical support and another zone for research, because each group has different technical needs.
- Role-based access control (RBAC): A policy-neutral access-control mechanism defined around roles and privileges.
- Server: A computer program or a device that provides functionality for other programs or devices, called clients.
- Virtual private network (VPN): A secure private network connection across a public network.
- VLAN (virtual LAN): A logical grouping of devices in the same broadcast domain
- Breach: an impermissible use or disclosure of electronic or non-electronic sensitive personal information by an unauthorized person or for an unauthorized purpose that compromises the security or privacy of Confidential Information such that the use or disclosure poses a risk of reputational harm, theft of financial information, identity theft, or medical identity theft.

5.9 I.T. Support

CASA Child Advocates of Montgomery County contracts with GTIN Managed IT, to maintain and oversee the configurations of all computing systems and devices.

Texas Booster Seat laws.

Texas requires that child safety seats are used based on manufacturer recommendations. NHTSA recommends that booster seats be used in the back seat from ages 4-8 and when the child weighs over 40 pounds unless the child is 4'9" or taller. Texas requires that child safety seats are used based on manufacturer recommendations. NHTSA recommends that booster seats be used in the back seat from ages 4-8 and when the child weighs over 40 pounds unless the child is 4'9" or taller.

TYPES OF BOOSTER SEATS YOU CAN USE

1



HIGH-BACK BELT-POSITIONING BOOSTER SEATS

Two types of high-back belt-positioning booster seats are available. Both types "boost" your child up so the vehicle safety belt fits better.

- 1 One type provides head and neck support for your child if your vehicle seat back does not have a head rest. It must be used with the vehicle's lap/shoulder belt, never with the lap belt only.
- 2 The other, a combination seat, converts from a forward-facing toddler seat to a booster seat and comes equipped with a harness. This type can be used as a forward-facing toddler seat when your child is age 1 and at least 20 pounds to about age 4 and 40 pounds. When your child outgrows the toddler seat, remove the harness and use the seat as a booster seat with the vehicle's lap/shoulder belt.

2



3



NO-BACK BELT-POSITIONING BOOSTER SEAT

- 3 This type also "boosts" your child up so the vehicle safety belt fits better. This booster seat is used with a lap/shoulder belt. It should only be used in vehicles with built-in head rests.

All booster seats are required by law to comply with the same safety standards as child safety seats. Your booster seat must have a label stating that it meets Federal motor vehicle safety standards.

SOURCE: NHTSA