



Risk Prevention and Management (PA-RPM)

2026 Updates for Public Agencies

Purpose

Proactive, comprehensive, and systematic risk prevention and management practices sustain the agency's ability to positively impact the communities and people it serves by reducing its risk, loss, and liability exposure.

Introduction

COA's Risk Prevention and Management standards require that agencies take a proactive approach to risk by continually improving systems and practices for identifying and mitigating potential risks and learning from adverse events and challenges when they occur. Proactive, systemic risk prevention and management requires a holistic approach that involves staff throughout the agency and considers all areas of potential risk including, but not limited to, legal compliance, liability exposure, health and safety, human resources, contracting, technology, security of information, client rights and confidentiality, and finances. Such practices contribute to mission fulfillment by protecting the agency's long-term sustainability.

Note: Please see [PA-RPM Reference List](#) for the research that informed the development of these standards.

Note: ~~For information about changes made in the 2020 Edition, please see [RPM Crosswalk](#).~~

PA-RPM 1: Legal and Regulatory Compliance

The agency annually reviews compliance with applicable federal, state, and local laws, codes, and regulations including those related to:

- a. licensure;
- b. facilities;
- c. accessibility;
- d. health and safety;
- e. finances; **and**
- f. human resources;

g. contracting; and

f.h. technology.

NA State-administered regional office

Interpretation: Regarding element (b), agencies that rent facilities should obtain relevant documentation from their landlord. If the agency cannot obtain access to the required documentation from their landlord or from relevant public or private health and safety authorities, the agency may also solicit a recognized expert to verify compliance with applicable laws and safety codes.

Interpretation: When necessary, the agency should consult legal counsel to obtain comprehensive guidance regarding legal and regulatory compliance.

Examples: Regarding element (b), examples of relevant regulations and codes can include certification of occupancy requirements; zoning and building codes; occupational safety and health administration codes; health, sanitation, and fire codes; and elevator inspections.

Regarding element (d), relevant requirements can include: universal precautions for minimizing exposure to contagious and infectious disease; and storage, cleaning, and disposal of medical waste.

Regarding element (e), relevant requirements can include those related to assuming fiduciary responsibility for the funds of persons served.

Regarding element (f), it is recommended practice to conduct an annual review of human resource practices to verify compliance with applicable employment and labor laws, civil service rules and regulations, and union contracts. The human resource management field refers to this annual review as an annual "audit." Examples of human resource laws and regulations include those pertaining to: use of independent contractors; use of contingent workers such as temporary employees, volunteers, and leased workers; ~~laws governing~~ fair employment practices, including non-discrimination and harassment; compensation and benefits; maintenance of personnel records; retention of hiring records; background checks; and collective bargaining.

Regarding element (h), applicable laws, codes, and regulations pertaining to the adoption and use of technology can include those related to:

a. cybersecurity;

b. electronic health records and HIPAA compliance;

c. data security;

d. intellectual property protections;

e. electronic communications and social media regulations;

f. AI adoption and use, including prohibited uses or what decisions can or cannot be aided by AI; and

g. any agency functions in which AI or other technology has been embedded such as hiring or performance management (e.g., laws governing fair employment practices).

Table of Evidence		
Standard Code	Evidence Type	Description
PA-RPM 1	On-Site Activities	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> Interviews may include: <ol style="list-style-type: none"> Agency leadership In-house counsel <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> Evaluated at the Central Office only
PA-RPM 1	On-Site Evidence	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> Reports from licensing/regulatory review, as applicable <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> Evaluated at the Central Office only
PA-RPM 1	Self-Study	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> A letter signed by the agency head: <ol style="list-style-type: none"> Certifying the agency is presently in compliance with applicable laws, codes, and regulations Summarizing the agency's current status/progress towards compliance with consent decrees, <u>if applicable</u> Progress reports or other evidence of the work being done to comply with consent decrees, <u>if applicable</u>

		<p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Evaluated at the Central Office only
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Rating Indicators	
Rating	
1	<p>Full Implementation, Outstanding Performance A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity. All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.</p>
2	<p>Substantial Implementation, Good Performance A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; <u>e.g.</u></p> <ul style="list-style-type: none"> • <u>The agency conducts compliance reviews across the required areas, but some elements could be more fully addressed. For example, the agency may not always ensure timely follow-up for minor findings.</u> <p>The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.</p> <p>Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.</p>
3	<p>Partial Implementation, Concerning Performance A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; <u>e.g.</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not reviewed annually; or</u> • <u>Some documentation is lacking.</u> <p>The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.</p> <p>Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.</p> <p>Service quality or agency functioning may be compromised.</p> <p>Capacity is at a basic level.</p>

Rating Indicators	
Rating	
4	<p>Unsatisfactory Implementation or Performance</p> <p>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</p> <p>The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.</p>

PA-RPM 2: Risk Prevention

The agency identifies and reduces potential loss and liability by:

- a. Conducting prevention and risk reduction activities; and
- b. monitoring and evaluating risk prevention and management effectiveness.

Table of Evidence		
Standard Code	Evidence Type	Description
PA-RPM 2	On-Site Activities	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Interviews may include: <ol style="list-style-type: none"> 1. Agency leadership 2. In-house counsel 3. Risk management personnel <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Interviews may include: <ol style="list-style-type: none"> 1. Regional Director
PA-RPM 2	On-Site Evidence	<p>All Agencies</p> <ul style="list-style-type: none"> • Management meeting minutes at which risk and risk prevention performance was last reviewed and improvement action steps were discussed and implemented, as applicable

		<ul style="list-style-type: none"> • Most recent quarterly and annual risk management reports, including analyses and improvement action plans, as applicable • Results of independent investigations of critical incidents
PA-RPM 2	Self-Study	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Risk management plan including: <ol style="list-style-type: none"> 1. Procedures for conducting annual assessment of potential agency risks 2. Procedures for quarterly review of immediate and ongoing risks 3. Procedures for investigation and review of critical incidents <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Regional risk management procedures, as applicable

Rating Indicators	
Rating	
1	<p>Full Implementation, Outstanding Performance A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity <u>as indicated by full implementation of the practices outlined in the PA-RPM 2 Practice standards.</u></p> <p>All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions: exceptions do not impact service quality or agency performance.</p>
2	<p>Substantial Implementation, Good Performance A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement, <u>as noted in the ratings for the PA-RPM 2 Practice standards.</u></p>

Rating Indicators	
Rating	
	<p>The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.</p> <p>Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.</p>
3	<p>Partial Implementation, Concerning Performance</p> <p>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement, <u>as noted in the ratings for the PA-RPM 2 Practice standards.</u></p> <p>The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.—</p> <p>Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.—</p> <p>Service quality or agency functioning may be compromised.—</p> <p>Capacity is at a basic level.</p>
4	<p>Unsatisfactory Implementation or Performance</p> <p>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all, <u>as noted in the ratings for the PA-RPM Practice standards.</u></p> <p>The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.</p>

PA-RPM 2.01

A written risk management plan operationalizes the agency's risk management activities and:

- a. articulates the agency's overall approach to risk management;
- b. describes the risk management structure and activities;
- c. defines staff roles and outlines training and competency expectations by job position or category; and
- d. includes measurable goals for reducing potential risks.

Interpretation: *Element (b) for statewide agencies, or agencies that cover multiple regions/communities, must ~~delineate~~include:*

- a. *the specific responsibilities of the central, regional, and local offices in carrying out risk management activities;*
- b. *how risk management information will be communicated among the various offices; and*
- c. *what role each office will play in implementing and tracking corrective action.*

Additionally, ~~in regards to element (b),~~ risk management activities should include contract monitoring activities that align with the standards in PA-~~PQI~~7CON 2.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>A plan is in place but one of the standard's elements is not fully implemented.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP PA-RPM 2.02

The agency annually assesses areas of potential risk including:

- a. compliance with legal requirements;
- b. disruption of operations due to a public health emergency;
- c. technology and information management;
- d. liability exposure;
- e. the health and safety of personnel and persons served including the prevalence of work-related stress and the impact of trauma;

- f. human resources practices and other workforce-related issues;
- g. contracting practices and compliance;
- h. client rights and confidentiality issues;
- i. financial risks;
- j. public relations, branding, and reputation; and
- k. conflicts of interest.

Interpretation: *Although the agency should assess all areas of potential risk at least annually and compare related areas, the assessments do not need to be conducted together at one time. For example, in agencies where certain assessments are conducted by external entities or centralized departments (e.g., information technology, human resources, or risk management offices), the agency should ensure it has access to and reviews the findings of those assessments annually. The agency remains responsible for integrating relevant results into its own risk profile and using them to inform strategic and annual planning and decision-making. When risk is conducted at various times of year or by different partners, the agency may submit one consolidated risk report or summary of findings as evidence of standard implementation.*

Interpretation: *Regarding element (c), annual assessments should include a review of systems in place to protect physical and electronic data and information, databases, files, computers and mobile devices, networks, and programs from unauthorized access, use, modification, disruption, destruction, and/or attack. Reviews should also consider the secure and ethical use of emerging technologies, such as artificial intelligence.*

Interpretation: *Regarding element (d), annual assessments of liability exposure should include a review of the agency’s use of agency- and privately-owned vehicles in the course of daily operations including, but not limited to, transporting clients, running errands, attending home visits, traveling between sites, attending meetings, etc.*

Interpretation: *Regarding element (f), in addition to risks associated with human resource practices and compliance with applicable laws and regulations, annual assessments should also include an evaluation of risks associated with workforce issues such as high turnover, work-related stress, and worker safety.*

Interpretation: *Regarding element (i), annual assessments should include an evaluation of financial risks in relation to the agency’s financial capacities and the resources needed to provide services.*

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>

Rating Indicators	
Rating	
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>Two of the standard's elements are not fully implemented; or</u> <u>One of the standard's elements is not addressed at all.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>Two of the standard's elements are not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP PA-RPM 2.03

The agency conducts a quarterly review of immediate and ongoing risks that includes a review of incidents, accidents, and grievances related to the following, as appropriate to each program or service:

- a. facility safety issues;
- b. serious illnesses, injuries, and deaths;
- c. situations where a person was determined to be a danger to himself/herself or others;
- d. client rights and confidentiality violations;
- e. technology use, including artificial intelligence (AI);
- d.f. service modalities or therapeutic interventions; and
- g. the use of restrictive behavior management interventions, such as seclusion and restraint.

EAP Interpretation: *In employee assistance programs, only elements (a)-(ee) could potentially apply.*

Examples: *Regarding element (b), serious illnesses can include those illnesses that pose a significant, widespread risk to public health or the health of the agency's staff and persons served.*

Example: The agency can ~~disaggregate~~ ~~examine~~ critical incident data ~~that disaggregates incidents by race and ethnicity~~ to identify trends ~~in service equity~~, such as disproportionate use of restrictive interventions with specific populations.

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Reviews are conducted at least quarterly but one of the standard's elements is not fully implemented.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>The agency conducts reviews less than quarterly; or</u> • <u>Two of the standard's elements are not fully implemented; or</u> • <u>One of the standard's elements is not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP PA-RPM 2.04

The agency conducts an independent review of each incident and accident that involves the threat of or actual harm, serious injury, and death; and review procedures:

- a. establish timeframes for review including requiring the investigation be initiated within 24 hours of the incident and/or accident being reported;
- b. require solicitation of statements from all involved individuals;
- c. ensure an independent review;
- d. require timely implementation and documentation of all actions taken;

- e. address ongoing monitoring if actions are required ~~to~~ determine their effectiveness; and
- f. address applicable reporting requirements.

Note: For child and family services agencies, please see PA-RPM 3.03 for more information on conducting internal administrative reviews following a child fatality or near fatality.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Reviews are occurring consistently and cover the elements of the standard, but documentation could be improved; or</u> • <u>One of the standard's elements is not fully implemented.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not addressed at all; or</u> • <u>While reviews are generally conducted, documentation is consistently missing; or</u> • <u>There is evidence that at least one serious incident was not reviewed.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 3: Child Fatality and Near Fatality Review

The agency is accountable to the public and manages risk associated with child maltreatment and fatalities.

NA The agency does not provide child and family services and is not assigned the Child and Family Services (PA-CFS) standards.

Table of Evidence		
Standard Code	Evidence Type	Description
PA-RPM 3	On-Site Activities	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Interviews may include: <ol style="list-style-type: none"> 1. Agency leadership 2. In-house counsel 3. Risk management personnel <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Interviews may include: <ol style="list-style-type: none"> 1. Regional Director
PA-RPM 3	On-Site Evidence	<p>All Agencies</p> <ul style="list-style-type: none"> • Reports for the previous year from: <ol style="list-style-type: none"> 1. Child fatality/near fatality review team 2. Administrative reviews following child fatalities/near fatalities • Child fatality/near fatality review team meeting minutes for the previous six months • Documentation of improvement/prevention activities related to any child fatalities or near fatalities in the current long-term planning period
PA-RPM 3	Self-Study	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Procedures for participation on and coordination with child fatality/near fatality review team • Public disclosure law/policy regarding child fatalities and near fatalities <p>State Administered Agency (Regional Office)</p>

		<ul style="list-style-type: none"> Procedures for participation on and coordination with the local child fatality/near fatality review team, as applicable
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Rating Indicators	
Rating	
1	<p>Full Implementation, Outstanding Performance A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity, <u>as indicated by full implementation of the practices outlined in the PA-RPM 3 Practice standards.</u></p> <p>All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.</p>
2	<p>Substantial Implementation, Good Performance A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement, <u>as noted in the ratings for the PA-AM 3 Practice standards.</u></p> <p>The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.</p> <p>Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.</p>
3	<p>Partial Implementation, Concerning Performance A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement, <u>as noted in the ratings for the PA-AM 3 Practice standards.</u></p> <p>The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.</p> <p>Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.</p> <p>Service quality or agency functioning may be compromised.</p> <p>Capacity is at a basic level.</p>

Rating Indicators	
Rating	
4	<p>Unsatisfactory Implementation or Performance</p> <p>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all, <u>as noted in the ratings for the PA-AM 3 Practice standards.</u></p> <p>The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.</p>

FP PA-RPM 3.01

The agency increases accountability to the public, promotes safety, and manages risk by:

- a. aggregating information on fatalities and near fatalities from multiple data sources;
- b. actively participating on a multi-disciplinary child fatality and near fatality review team;
- c. participating in investigations of child fatalities and near fatalities, as appropriate, including assessing the safety of surviving children in the home; and
- d. ensuring adherence to the public disclosure policy, which reflects federal statute.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u></p> <p><u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u></p> <p><u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>While accountability practices are in place, one of the standard's elements is not fully implemented (e.g., only one or two data sources are used, or the agency's representative has missed several review team meetings.)</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u></p> <p><u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p>

Rating Indicators	
Rating	
	<ul style="list-style-type: none"> • <u>One of the standard's elements is not addressed at all.</u>
4	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP PA-RPM 3.02

The agency incorporates recommendations from the child fatality and near fatality review team into its risk prevention, quality improvement, and long-term planning activities by:

- a. developing a customized improvement plan to implement recommendations;
- b. tracking progress toward plan implementation; and
- c. monitoring and periodically reporting back to the review team on the status of planned improvements.

Rating Indicators	
Rating	
1	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
2	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not fully implemented (e.g., some progress has not been tracked.)</u>
3	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not addressed at all.</u>

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP PA-RPM 3.03

The agency conducts internal administrative reviews following a fatality or near fatality of any child known to the agency to:

- a. assess the agency’s internal operations including adherence to policies and procedures; and
- b. identify and respond to the social and emotional support needs of staff.

Interpretation: *Conducting administrative reviews of fatalities or near fatalities of “any child known to the agency” means an open case is not required to pursue an internal investigation. Agencies should follow state definitions regarding what it means to be “known to the agency” (e.g. how long-ago contact was last made, the type of contact, etc.).*

Note: *The agency should also conduct aggregate reviews of child fatalities or near fatalities to identify trends or patterns of concern as part of the quarterly review process in PA-RPM 2.03. See PA-RPM 2.04 for additional incident review requirements, including requirements for corrective action.*

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard’s elements is not fully implemented (e.g., the protocol for identifying and responding to the social and emotional needs of staff could be clarified.</u>

Rating Indicators	
Rating	
3	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>One of the standard's elements is not addressed at all; or</u> <u>The agency only conducts internal administrative reviews following a fatality or near fatality of a child with an open case.</u>
4	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 4: Technology and Information Management

The agency's technology and information systems have sufficient capability to support operations, service delivery, strategic planning, and quality improvement activities.

NA State-administered agency regional office

Interpretation: *The standards in this section address the management of all types of paper and electronic information maintained by the agency including:*

- case records and other information of persons served;*
- administrative, financial, and risk management records and reports;*
- personnel files and other human resources records or data;*
- performance and quality improvement data and reports; and*
- contract monitoring data and reports.*

Interpretation: Public agencies may operate within governance structures where some or all technology and information management functions are centralized or externally managed. In such cases, the agency's role may be limited to monitoring use of these systems and communicating operational needs rather than direct management of those functions. Standards should be interpreted within this context, and agencies should clearly document which technology and information management functions or systems are subject to external control.

Table of Evidence		
Standard Code	Evidence Type	Description

PA-RPM 4	On-Site Activities	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Interviews may include: <ol style="list-style-type: none"> 1. Finance personnel 2. PQI personnel 3. Information systems manager 4. Direct service personnel • Observe information systems <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Evaluated at Central Office only
PA-RPM 4	On-Site Evidence	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • <u>Documentation of annual review of AI acceptable use policy</u> • Agreements with third parties (e.g., <u>information technology or information management</u> vendors, business associates, etc.), when applicable <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> • Evaluated at Central Office only
PA-RPM 4	Self-Study	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> • Most recent technology and information management assessment • <u>Information management procedures/guidelines</u> • <u>AI acceptable use policy</u> • For state-administered child welfare systems, most recent SACWIS Assessment and Improvement Plan <p>State Administered Agency (Regional Office)</p>

		<ul style="list-style-type: none"> • Evaluated at Central Office only
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Rating Indicators	
Rating	
1	<p>Full Implementation, Outstanding Performance A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity, <u>as indicated by full implementation of the practices outlined in the PA-RPM 4 Practice standards.</u></p> <p>All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.</p>
2	<p>Substantial Implementation, Good Performance A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement, <u>as noted in the ratings for the PA-RPM 4 Practice standards.</u></p> <p>The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.</p> <p>Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.</p>
3	<p>Partial Implementation, Concerning Performance A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; <u>as noted in the ratings for the PA-RPM 4 Practice standards.</u></p> <p>The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.</p> <p>Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.</p> <p>Service quality or agency functioning may be compromised.</p> <p>Capacity is at a basic level.</p>
4	<p>Unsatisfactory Implementation or Performance A rating of (4) indicates that implementation of the standard is minimal or there is no</p>

Rating Indicators	
Rating	
	<p>evidence of implementation at all, <u>as noted in the ratings for the PA-RPM 4 Practice standards.</u></p> <p>The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.</p>

PA-RPM 4.01

The agency assesses its technology and information management needs based on feedback from direct service staff and supervisors including ~~and~~ a review of:

- a. current technology and information systems in use by the agency;
- b. short- and long-term goals for utilizing technology; and
- c. current technical skills of staff and need for training.

Interpretation: The technology assessment should include artificial intelligence (AI) regardless of whether the agency is currently using it. This ensures preparedness for potential adoption and helps mitigate risks that may arise if staff are using AI without clear policies or guidance. See PA-RPM 4.04 and PA-RPM 6 for more information on ethical and responsible AI use.

Examples: *Involving direct service staff and supervisors in the needs assessment of current technology and information systems can help produce information systems that are needs-driven, flexible, and user-friendly.*

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u></p> <p><u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u></p> <p><u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not fully implemented.</u>

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>The assessment is very basic and provides minimal guidance; or</u> <u>One of the standard's elements is not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 4.02

The agency has an information management system that:

- gives personnel consistent, timely, and appropriate access to paper and electronic records; and
- supports continuity and integration of care across settings and services by giving timely access to information about persons served to practitioners across the agency, as appropriate.

Interpretation: *Agencies moving to electronic systems may need to develop procedures for maintaining both electronic and paper records including procedures for maintaining consistency between the two file types and ensuring the electronic record is comprehensive and complete. If there are components of paper records that cannot be accommodated electronically, the agency should consider how it will retain and document the existence of supplemental, paper-based portions of records.*

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>

Rating Indicators	
Rating	
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>A formal system is in place but is not fully implemented, so locating records may sometimes be time-consuming or difficult.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>The system is informal and disorganized; or</u> <u>Records are occasionally misplaced.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all; e.g.,</u></p> <ul style="list-style-type: none"> <u>There is no system in place; or</u> <u>Records are frequently misplaced.</u>

PA-RPM 4.03

The agency's electronic information systems are appropriate to its size and complexity and permit:

- a. information sharing between the public agency and its contracted providers, when applicable;
- b. capturing, tracking, and reporting financial, compliance, and other business information;
- c. access to real-time data to inform decision making at the worker, program, region/community, agency, and system level;
- d. longitudinal reporting and comparison of performance over time; and
- e. useful, clear, and consistent data reporting.

NA Another entity is responsible for selecting or designing the electronic information system state-wide.

Interpretation: "Electronic information systems" are used for collecting, storing, analyzing, and disseminating information electronically. An electronic information system may consist of a

single desktop or larger network of computers, laptops, and/or devices. Agencies must have systems that can effectively support their administrative operations and service delivery.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>One of the standard's elements is not fully implemented.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>The system is basic and does not fully support the agency's data needs; or</u> • <u>One of the standard's elements is not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

FP-PA-RPM 4.04

The agency maintains an AI acceptable use policy that prioritizes the needs of people and communities and:

- a. provides clear guidance on whether AI use is permitted, which applications are approved, their intended purpose, and guidelines for their responsible use;
- b. reflects the agency's data security and confidentiality policies and procedures;
- c. aligns with the agency's mission, values, and strategic plan; and
- d. is reviewed and updated annually.

Interpretation: To avoid the need for frequent updates, the AI acceptable use policy can state that only AI applications that have been reviewed and approved may be used and then refer to a separate list of approved tools that is maintained by the AI oversight group for more information.

Examples: Regarding element b, AI data security measures can include: (a) prohibiting personal information (e.g., personally identifiable information, financial information, and personal health information) about persons served, staff, volunteers, or contractors from being entered into unsecured AI tools; (b) limiting the collection and storage of data to only what is necessary for the AI's specific purpose; (c) requiring personal data be anonymized, whenever possible, before being entered into secured AI systems; (d) permitting the inclusion of confidential or sensitive information in AI outputs only when necessary for service delivery; and (e) protecting AI outputs that contain confidential or sensitive information from intentional or unintentional theft, unauthorized use or disclosure, damage, or destruction as outlined in PA-RPM 5.

Examples: Regarding element c, the agency can demonstrate that its AI acceptable use policy is aligned with its mission and values by, (a) referencing its mission statement in the policy and outlining how AI use is intended to support the delivery of human-centered, high-quality services; (b) defining acceptable and prohibited uses of AI within the context of the agency's vision and values, prohibiting uses of AI that directly conflict with these; and (c) tailoring the language in the AI policy to reflect the agency's stated mission and values rather than relying solely on technological jargon or generic language.

Note: Agencies may fully incorporate their AI acceptable use policy into their existing data security and confidentiality policies and procedures. When that is the case, evidence of implementation for this standard will overlap with evidence provided in PA-RPM 5 and PA-CR 2.

Rating Indicators	
Rating	
1	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
2	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>An AI acceptable use policy is in place, but some aspect of the policy needs further development.</u>
3	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>The policy is very basic and provides minimal guidance to staff; or</u> • <u>The policy is not well-understood by staff or is frequently not being followed;</u> <u>or</u>

Rating Indicators

Rating	
	<ul style="list-style-type: none"> <u>A policy is still under development.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 5: Security of Information

Electronic and printed information is protected against intentional and unintentional destruction or modification and unauthorized disclosure or use.

Interpretation: *The standards in this section address security of all types of paper and electronic information maintained by the agency/organization, unless otherwise noted, including:*

- a. *case records and other information of persons served;*
- b. *administrative, financial, and risk management records and reports;*
- c. *personnel files and other human resource records or data; and*
- d. *performance and quality improvement data and reports.*

Table of Evidence

Standard Code	Evidence Type	Description
PA-RPM 5	On-Site Activities	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> Interviews may include: <ol style="list-style-type: none"> 1. Finance personnel 2. PQI personnel 3. Information systems manager 4. Direct service personnel

		<ul style="list-style-type: none"> Observe case record room/files and information systems <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> Interviews may include: <ol style="list-style-type: none"> Regional Director Agency leadership Direct service personnel Observe case record room/files and information systems
PA-RPM 5	On-Site Evidence	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> Agreements with third parties (e.g., information technology vendors, business associates, etc.), when applicable Results of HIPAA compliance reviews <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> Agreements with third parties (e.g., information technology vendors, business associates, etc.), when applicable Results of HIPAA compliance reviews Regional communications with staff regarding case record security policy and office-specific secure location expectations (memos, orientation schedule, etc.)
PA-RPM 5	Self-Study	<p>County/Municipality Administered Agency, State Administered Agency (Central Office), or other Public Entity</p> <ul style="list-style-type: none"> Policies and/or procedures for: <ol style="list-style-type: none"> Data security, including HIPAA compliance as applicable Use of social media, electronic communications, and mobile devices

		<p>3. Managing data interruptions and resuming operations</p> <p>State Administered Agency (Regional Office)</p> <ul style="list-style-type: none"> <i>No Self-Study Evidence</i>
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Rating Indicators	
Rating	
1	<p>Full Implementation, Outstanding Performance A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity, <u>as indicated by full implementation of the practices outlined in the PA-RPM 5 Practice standards.</u></p> <p>All elements or requirements outlined in the standard are evident in practice, with rare or no exceptions; exceptions do not impact service quality or agency performance.</p>
2	<p>Substantial Implementation, Good Performance A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement, <u>as noted in the ratings for the PA-RPM 5 Practice standards.</u></p> <p>The majority of the standards requirements have been met and the basic framework required by the standard has been implemented.</p> <p>Minor inconsistencies and not yet fully developed practices are noted; however, these do not significantly impact service quality or agency performance.</p>
3	<p>Partial Implementation, Concerning Performance A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement, <u>as noted in the ratings for the PA-RPM 5 Practice standards.</u> -</p> <p>The agency has not implemented the basic framework of the standard but instead has in place only part of this framework.</p> <p>Omissions or exceptions to the practices outlined in the standard occur regularly, or practices are implemented in a cursory or haphazard manner.</p> <p>Service quality or agency functioning may be compromised.</p> <p>Capacity is at a basic level.</p>

Rating Indicators	
Rating	
4	<p>Unsatisfactory Implementation or Performance</p> <p>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all, <u>as noted in the ratings for the PA-RPM 5 Practice standards</u>.</p> <p>The agency's observed administration and management infrastructure and practices are weak or non-existent; or show signs of neglect, stagnation, or deterioration.</p>

PA-RPM 5.01

The agency protects confidential and other sensitive information from theft, unauthorized use or disclosure, damage, or destruction both on and off site by:

- a. limiting access to authorized personnel on a need-to-know basis;
- b. using firewalls, encryption and/or secured networks, anti-virus and related software, and other appropriate safeguards;
- c. monitoring security measures on an ongoing basis;
- d. having the ability to remotely wipe or disable mobile devices, if applicable; and
- e. maintaining paper records in a secure location, when applicable.

Note: Please see the Facility Observation Checklist for additional guidance on this standard.

Examples: Regarding element (a), the agency may limit access to authorized personnel by:

a. limiting access based on staff role within the agency;

a.b. using encryption;

b.c. ensuring the electronic information systems require strong passwords/passcodes for access to confidential information, require passwords/passcodes to be regularly changed, lock the user out of the system for incorrect login attempts, and automatically time out after a period of inactivity prompting re-authentication;

e.d. disabling the equipment, passwords, and access of former employees; and

d.e. ensuring the information systems ~~are capable of tracking~~ can track who accesses confidential information in the system and ~~recording record~~ when information is altered or deleted, also known as audit logs.

Regarding element (e), secure storage of paper records can include:

- a. locked file cabinets;

- b. a locked file room with limited access or a gatekeeper system whereby one person or a few people can unlock the file storage area or access the files themselves; or
- c. a system using a keypad or keys where only authorized individuals are given the keypad code or copies of the keys.

Other important considerations can include information taken off-site by staff.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Some aspects of the agency's data security procedures needs strengthening; or</u> • <u>With few exceptions, procedures are understood by staff and are being used.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>There is a major deficiency in one of the listed elements resulting in risk to the agency; or</u> • <u>There has been at least one instance of unauthorized access to confidential or sensitive information; or</u> • <u>Procedures are not well-understood or used appropriately.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all; e.g.,</u></p> <ul style="list-style-type: none"> • <u>The agency does not have procedures to protect confidential and other sensitive information; or</u> • <u>There is a major deficiency in more than one of the listed elements; or</u>

Rating Indicators	
Rating	
	<ul style="list-style-type: none"> • <u>There have been multiple instances of unauthorized access to confidential or sensitive information.</u>

PA-RPM 5.02

Proper safeguards protect ~~C~~confidential information, when transmitted electronically ~~transmitted, is protected by safeguards in compliance with applicable legal requirements.~~

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement.</u></p>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement.</u></p>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 5.03

The agency has policies and procedures~~guidelines~~ addressing the use and monitoring of:

- a. social media;
- b. electronic communications; and
- c. mobile devices, including staff-owned devices, if applicable.

Examples: ~~"Social media and electronic communications" include a variety of applications and websites used to create and share content, for example:-~~

~~the agency's own website;-~~

~~external websites;~~

~~email;~~

~~texting;-~~

~~blogs;~~

~~social networking and bookmarking sites such as Pinterest, Instagram, Twitter, and Facebook;~~

~~wikis; and~~

~~discussion forums.~~

Risks associated with the use of social media and electronic communications may include:

- a. *unauthorized or prohibited contact between staff and persons served;*
- b. *unauthorized or inappropriate use of agency logos or trademarks;*
- c. *personal comments or opinions that can be misconstrued as representing the views of the agency, or misrepresent the agency;*
- d. *inadvertent or deliberate disclosure of confidential or proprietary business information;*
and
- e. *inadvertent or deliberate disclosure of confidential or protected information about persons served.*

Examples: *A social media policy could address:*

- a. *the agency's definition of "social media";*
- b. *responsible parties (e.g., individuals responsible for setting up accounts, contributing content, monitoring content, etc.);*
- c. *prohibited forms of communication;*
- d. *the appropriate use of social media including confidentiality and privacy considerations;*
and/or
- e. *consequences for failure to follow the policy and/or related guidelines.*

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Policies and procedures are in place, but some aspects need further development.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Procedures are very basic and provide minimal guidance to staff; or</u> • <u>Procedures are not well-understood by staff or are not frequently followed; or</u> • <u>Procedures are still under development and have only been partially implemented.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 5.04

The agency is prepared for planned and unplanned interruptions of data and limits the disruption to its operations and service delivery by:

- a. maintaining procedures for managing data interruptions and resuming operations;
- b. backing up electronic data regularly, with copies maintained off premises; and
- c. regularly testing the agency's back-up plan including data restoration processes.

Interpretation: *This standard applies to any instance of prolonged data disruption, regardless of whether there is a corresponding emergency.*

Examples: *A disaster recovery plan is a set of procedures put in place to protect and recover an agency's IT infrastructure to ensure the continuation of business in the event of a disaster. The plan clearly defines what disaster means for the agency's administrative operations and*

service delivery. It also includes specific guidance on when primary systems are considered nonfunctional/shut down, at what point secondary systems should be activated, who has the authority to make that determination, and how to inform staff and stakeholders that a disaster has occurred.

Factors that increase the effectiveness of a disaster recovery plan include:

- a. training staff on response procedures;
- b. practicing procedures/conducting downtime drills;
- c. testing disaster recovery systems on an ongoing basis; and
- d. monitoring plan implementation.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Procedures are in place, but some aspects need further development.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>Procedures are very basic and provide minimal guidance to staff; or</u> • <u>Procedures are not well-understood by staff; or</u> • <u>Procedures are still under development and have only been partially implemented.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p>

PA-RPM 5.05

The agency ensures its electronic information system for managing health records or protected health information limits access to information in accordance with confidentiality rules and the person's privacy preferences to the greatest extent possible.

- ~~a. operates in compliance with all applicable regulations; and~~
- ~~1. limits access to information in accordance with confidentiality rules and the person's privacy preferences to the greatest extent possible.~~

NA *The agency does not electronically manage health records or protected health information.*

Interpretation: ~~Regarding element (b), if the electronic health record system employed by the agency is not able to meet all the person's privacy preferences and/or all of the necessary confidentiality rules, the agency must inform the service recipient of the system's limitations and obtain consent for the exchange of electronic health information based on those restrictions. If the agency cannot accommodate the client's preferences and their consent is not obtained, the agency should connect the person to another provider who can meet their needs and privacy preferences.~~

~~**Examples:** The HIPAA Security Rule and federal interoperability standards provide guidance to agencies regarding the technical capabilities and safeguards expected of electronic health record systems. Using certified EHR Technology (CEHRT) supports compliance with HIPAA and federal interoperability requirements when paired with appropriate agency safeguards. **Examples:** The HIPAA Security Rule and Meaningful Use criteria provide strong guidance to agencies regarding the capabilities of electronic health record (EHR) systems. Using a certified EHR is the best way to meet the Meaningful Use criteria. Agencies that are unable to acquire a certified EHR should still strive to meet Meaningful Use recommendations in their selection and use of EHR systems.~~

Rating Indicators	
Rating	
<u>1</u>	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>
<u>2</u>	<u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u> <ul style="list-style-type: none"><u>• Procedures for monitoring and maintaining confidentiality require greater clarity or specificity.</u>

Rating Indicators	
Rating	
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>The agency is aware of problems and is working to remediate deficiencies.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all; e.g.,</u></p> <ul style="list-style-type: none"> <u>The agency is aware of problems and is not working to remediate deficiencies.</u>

PA-RPM 6: Ethical and Responsible Use of Artificial Intelligence (AI)

The agency's use of AI is aligned with its mission and values, minimizes risk, and prioritizes the well-being of people and communities.

NA The agency is not using AI systems of any kind in its operations, and its policies prohibit staff from using AI applications.

Rating Indicators	
Rating	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity, as indicated by full implementation of the practices outlined in the PA-RPM 6 Practice standards.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement, as noted in the ratings for the PA-RPM 6 Practice standards.</u></p>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices</u></p>

Rating Indicators

<u>Rating</u>	
	<u>require significant improvement, as noted in the ratings for the PA-RPM 6 Practice standards.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u></p> <p><u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all, as noted in the ratings for the PA-RPM 6 Practice standards.</u></p>

Table of Evidence

<u>Self Study Evidence</u>	<ul style="list-style-type: none"> <u>AI monitoring and accountability procedures</u> <u>Job description and resume of qualified professional(s) responsible for AI model design, training, and maintenance and/or formal agreement with an appropriate vendor, when applicable</u>
<u>On-Site Evidence</u>	<ul style="list-style-type: none"> <u>Results of AI risk-benefit analysis</u> <u>Informational materials and/or AI disclosure statement(s) provided to applicable stakeholder groups</u> <u>Documentation of AI oversight activities (e.g., review and approval for AI tools/applications, bias reports and evidence of corrective action when indicated, impact reports and evidence of corrective action when indicated, etc.)</u> <u>Documentation of stakeholder engagement in AI discussions and decision-making</u>
<u>On-Site Activities</u>	<ul style="list-style-type: none"> <u>Observe AI applications currently in use</u>

	<ul style="list-style-type: none"> • <u>Review AI Acceptable Use policy on public website</u> • <u>Review system for documenting AI-assisted decisions impacting rights or safety</u> • <u>Interviews may include:</u> <ul style="list-style-type: none"> ○ <u>Relevant personnel</u> ○ <u>IT personnel responsible for AI model design, training, and maintenance, when applicable</u> ○ <u>Persons served</u> ○ <u>Personnel responsible for AI oversight</u> ○ <u>AI vendors, when applicable</u>
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RPM 6.01

Before implementing an AI strategy, the agency conducts a risk-benefit analysis that evaluates the potential impacts of AI on the agency and its stakeholders.

Examples: Relevant stakeholders may include staff at all levels of the agency, persons served, community partners, and others that may be impacted by the agency's AI use.

Examples: Relevant questions that can help agencies to evaluate potential impact include: what problem is this AI solution intended to address, who will benefit from this solution, do the potential beneficiaries want it, and what are the risks and how might they be mitigated?

This evaluation can consider, for example, AI's potential impacts on: (a) client rights, dignity, and privacy; (b) professional roles, judgment, and workforce wellbeing; (c) service quality and access; (d) community relationships and stakeholder trust; and (e) the environment.

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>

Rating Indicators

<u>Rating</u>	
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"><u>• The risk/benefit analysis was somewhat informal but results clearly informed AI implementation at the agency; or</u><u>• Written evidence of the risk/benefit analysis could be strengthened but staff were able to describe how the analysis informed AI implementation.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"><u>• There is evidence that a discussion of potential risks and benefits occurred, but it is not clear that impacts on both the agency and its stakeholders were considered; or</u><u>• Risks and benefits were discussed but there is no evidence that this informed adoption of AI strategies in any significant way; or</u><u>• Staff report that discussions around potential benefits of AI adoption occurred but risks were not considered.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p> <ul style="list-style-type: none"><u>• Little or no effort was made to consider the risks and benefits of AI adoption prior to implementation.</u>

RPM 6.02

Agencies that are building or significantly customizing technology using coding methods, ensure the availability of an appropriately qualified team that is responsible for:

- a. training AI models using large, accurate, diverse, and representative datasets;
- b. documenting model design, assumptions, limitations, and training data and maintaining version control;
- c. regularly retraining and validating the model to reflect changes in real-world conditions or to address issues that arise through ongoing monitoring activities; and
- d. providing technical assistance and maintenance.

Interpretation: *Building or significantly customizing tools using coding methods includes activities such as software design and development, data architecture or infrastructure design, or creating digital platforms, applications, or tools that go beyond the basic customization of off-the-shelf products using non-coding methods.*

NA *The agency is not building or significantly customizing technology using coding methods.*

<u>Rating Indicators</u>	
<u>Rating</u>	
<u>1</u>	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
<u>2</u>	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>An appropriately qualified team is in place but one of the elements is not fully implemented.</u>
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>An appropriately qualified team is in place but two of the elements are not fully implemented; or</u> • <u>An appropriately qualified team is in place but one of the elements is not addressed at all.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p> <ul style="list-style-type: none"> • <u>The agency is building or significantly customizing AI tools without the support of an appropriately qualified team; or</u> • <u>Staff responsible for building or customizing AI tools report feeling underqualified; or</u> • <u>An appropriately qualified team is in place but two of the elements are not addressed at all.</u>

FP RPM 6.03

A copy of the AI acceptable use policy is available on the agency's public website and stakeholders are helped to understand:

- a. why, when, and how AI is being used, including what data is being collected, stored, and/or shared;
- b. the risks and ethical considerations of AI use;
- c. what safeguards are in place to mitigate risk and unintended consequences of AI use;
- d. how to provide feedback on AI use and report negative impacts for investigation and remediation; and
- e. how to opt out of AI use, including data collection when applicable.

Interpretation: When persons served refuse the use of AI technologies, the agency should provide services without it. If that is not possible, the individual must be connected with another provider that meets their needs.

Rating Indicators	
Rating	
1	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>
2	<u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u> <ul style="list-style-type: none"><u>• The acceptable use policy is available on the public website, but stakeholders report that one element is not fully understood; or</u><u>• The AI acceptable use policy is difficult to find on the website and, as a result, is not likely to be accessed but all elements are well understood by stakeholders; or</u><u>• Some minor aspect of the AI policy is difficult to understand.</u>
3	<u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u> <ul style="list-style-type: none"><u>• Several aspects of the AI policy are difficult to understand; or</u><u>• The AI acceptable use policy is not available on the public website; or</u><u>• Two of the elements are not fully understood by stakeholders; or</u><u>• One element is not explained at all to stakeholders.</u>

Rating Indicators	
Rating	
4	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p> <ul style="list-style-type: none"> <u>There is little to no transparency regarding how the agency is using AI.</u>

RPM 6.04

Client-facing, AI-enabled tools, such as FAQ chatbots, clearly inform users that they are interacting with an AI-powered system and provide a clear, accessible option for connecting with a human when desired.

Interpretation: The use of conversational bots for talk therapy is an emerging practice and is not yet well established. There have been documented instances in which the use of such tools for behavioral health support has resulted in serious harm, particularly among vulnerable populations such as children and adolescents. The American Psychological Association has indicated that more evidence is needed to demonstrate the effectiveness and safety of these tools in behavioral health care. As such, the use of conversational AI chatbots as a substitute for a qualified mental health provider is not recommended. See PA-RPM 6.05 for more information on maintaining human oversight and accountability of all AI-assisted processes and decision-making.

NA The agency does not use client-facing, AI-enabled tools (e.g., FAQ chatbots or virtual assistants).

Rating Indicators	
Rating	
1	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p>
2	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> <u>The method for notifying users when they are interacting with AI is present but could be more prominently displayed; or</u> <u>Options for connecting with a human exist but could be more convenient or user-friendly.</u>

Rating Indicators

<u>Rating</u>	
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"><u>• The method for notifying users when they are interacting with AI is adequate, but options for connecting with a human are not present.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p> <ul style="list-style-type: none"><u>• There is little to no transparency for users interacting with client-facing AI-enabled tools.</u>

FP RPM 6.05

The agency maintains human oversight and accountability of all AI-assisted processes by establishing mechanisms for:

- a. conducting sufficient pre-deployment testing;
- b. detecting and mitigating bias in AI inputs and outputs;
- c. reporting, investigating, and remediating negative impacts of AI;
- d. regularly reviewing what data is available to AI tools and ensuring that the level of sharing continues to be appropriate;
- e. human review of AI outputs for quality, accuracy, compliance, respect, and fairness prior to inclusion in the case record, dissemination, or use in decision making; and
- f. documenting all AI-assisted decisions that impact rights or safety or have the potential to impact rights or safety.

Interpretation: AI may supplement human judgement and critical thinking but should never replace it. The AI acceptable use policy submitted in PA-RPM 4 should ensure human involvement and accountability in any decision making that has the potential to impact rights or safety.

AI-assisted decisions that impact rights and safety include, but are not limited to, those related to diagnosis or treatment; hiring, performance evaluation, promotion, or termination; assessment of risk of harm to self or others; allocation of resources; eligibility, access to services, triaging cases, or balancing caseloads across workers; adoption matching and child custody; and protective actions for children, older adults, or adults with disabilities. Some AI uses have the potential to impact rights or safety if the decisions they inform lead to negative

outcomes, misinformation, or create unnecessary barriers to accessing needed supports or services.

Systems for tracking these AI-assisted decisions may vary based on the agency's size, IT infrastructure, maturity of AI integration, and AI use cases. Agencies may choose to use existing systems for tracking these decisions, such as case record notations or tracking systems embedded in AI tools or applications, or they may maintain separate logs or other tracking systems specifically designed for this purpose. The chosen tracking method should allow for transparency, accountability, and effective monitoring of AI-assisted decisions over time.

Rating Indicators	
Rating	
1	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>
2	<u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u> <ul style="list-style-type: none"><u>• Two of the elements are not fully addressed; or</u><u>• One of the elements is not addressed at all.</u>
3	<u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u> <ul style="list-style-type: none"><u>• Three of the elements are not fully addressed; or</u><u>• Two of the elements are not addressed at all.</u>
4	<u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u> <ul style="list-style-type: none"><u>• The agency has established very few mechanisms for human oversight and accountability, posing significant risk to the agency and its stakeholders.</u>

RPM 6.06

The agency designates a multidisciplinary AI oversight group that is responsible for:

- a. establishing and reviewing the agency's AI acceptable use policy and its monitoring and accountability procedures;
- b. receiving and responding to stakeholder feedback and questions;

- c. investigating and remediating reports of harmful AI outcomes;
- d. approving and regularly reviewing AI technologies and use cases; and
- e. monitoring the impact of AI on the agency's capacity to deliver services and meet the needs of persons served.

Interpretation: When approving and/or reviewing AI use cases, agencies should consider factors that may impact their reliability, associated risks, and potential value, such as: (a) how often the AI is likely to encounter new or unexpected situations in the use case, (b) whether sufficient, accurate data exists to inform reliable predictions, (c) how willing impacted staff are to adopt the AI solution, (d) what the cost or impact will be if the AI makes errors, (e) what risks already exist in the current process and how might those risks change with the assistance of AI, (f) how likely staff are to use the technology in a way that falls outside its intended purpose, (g) how aligned the potential use case is with agency goals, (h) how urgent the need is that the AI is intended to address, and (i) how much staff time will be required to review AI outputs compared to the time saved by automation.

Rating Indicators	
Rating	
1	<p><u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u></p> <ul style="list-style-type: none"> • <u>The agency has identified a multidisciplinary team responsible for AI oversight and there is evidence that all elements of the standard are being implemented.</u>
2	<p><u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>The agency has identified a person or team responsible for AI oversight, but one element of the standard is not fully implemented</u>
3	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none"> • <u>A person or team responsible for AI oversight has been identified but their responsibilities are not well defined; or</u> • <u>There is little evidence that AI oversight responsibilities have been officially delegated but there is evidence that some oversight mechanisms have been initiated (e.g. there is an AI acceptable use policy in place).</u>

Rating Indicators

<u>Rating</u>	
<u>4</u>	<u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u> <ul style="list-style-type: none"><u>There is no evidence that AI oversight responsibilities have been delegated and little to no evidence that oversight mechanisms have been established.</u>

RPM 6.07

The agency engages stakeholders in ongoing discussions about the impact of AI and provides affected people and communities with meaningful opportunities to influence how AI is used in the agency.

Examples: Literature on successful AI deployment in the workplace points to the early engagement of staff as central to successful AI adoption. Asking staff to identify real problems they would like to see addressed, providing opportunities for staff to experiment with different AI applications that could resolve their identified concerns, collecting and responding to feedback on how things went, and then expanding solutions across departments, functions, or use cases are all ways that agencies can promote engagement and buy-in among their staff.

Examples: The agency can promote meaningful engagement of stakeholders by requesting feedback on the use of AI, training staff on meaningful engagement practices and how to discuss AI within the context of service delivery, and informing individuals of how the agency will use their input and notifying them of any changes that were made as a result.

Rating Indicators

<u>Rating</u>	
<u>1</u>	<u>Full Implementation, Outstanding Performance</u> <u>A rating of (1) indicates that the agency's practices fully meet the standard and reflect a high level of capacity.</u>
<u>2</u>	<u>Substantial Implementation, Good Performance</u> <u>A rating of (2) indicates that an agency's infrastructure and practices are basically sound but there is room for improvement; e.g.,</u> <ul style="list-style-type: none"><u>There is evidence that stakeholders were meaningfully engaged in discussions early on in AI adoption, but ongoing methods of engagement could be more developed.</u>

Rating Indicators

<u>Rating</u>	
<u>3</u>	<p><u>Partial Implementation, Concerning Performance</u> <u>A rating of (3) indicates that the agency's observed infrastructure and/or practices require significant improvement; e.g.,</u></p> <ul style="list-style-type: none">• <u>There is evidence that stakeholders have been engaged in some conversations regarding AI use, but it is not clear that their feedback has been used to inform the agency's AI use; or</u>• <u>The agency has received and acted on some stakeholder feedback but mechanisms for engagement are too informal and sporadic to be meaningful.</u>
<u>4</u>	<p><u>Unsatisfactory Implementation or Performance</u> <u>A rating of (4) indicates that implementation of the standard is minimal or there is no evidence of implementation at all.</u></p> <ul style="list-style-type: none">• <u>Little or no effort is made to provide meaningful opportunities for stakeholders to influence how AI is used in the agency.</u>