



Federal Monitoring of Child and Family Service Programs: Request for Public Comment and Consultation Meetings

The Black Administrators in Child Welfare and the National Association of Black Social Workers have collaboratively responded to the Children's Bureau's request for public comment relative to its monitoring of child and family service programs. Please find our recommendations and comments below. Also, the Black Administrators in Child Welfare has attached its recent publication which provides more details about strategies and supports that will ensure positive outcomes for African American families and children in the foster care.

1. How could ACF best promote and measure continuous quality improvement in child welfare outcomes and the effective functioning of systems that promote positive outcomes for children and families?

To address the issues associated with measuring qualitative improvements in child welfare outcomes it is imperative that reporting and monitoring systems include data that not only identifies demographics including race but identifies and tracks the service outcomes. For African American and other children of color this information makes it more likely that patterns of behavior that enable service disparities to continue to exist to become known. This includes requirements that practices such as data driven decision making become an integral part of child welfare reporting and monitoring through data racking systems that correlate participation with outcomes by individual child.

Data should be collected and reported on the availability and access to other supportive services such as access to health and mental health treatment services especially identifying services to underserved populations.

Funding that supports focused research about the services that are being provided and the outcomes achieved is essential in the process that ACF uses to make decisions regarding the disparity of services, relevance or need for existing services. Financial support for design and implementation of state and local data systems that capture critical service indicators of positive outcomes for children should be given top priority.

2. To what extent should data or measures from national child welfare databases (e.g., the Adoption and Foster Care Analysis and Reporting System, the National Child Abuse and Neglect Data System) be used in a Federal monitoring process and what measures are important for State/Tribal/local accountability?

The most practical and effective change that ACF should undertake to improve the monitoring and accountability systems is to develop an integrated system for these reporting requirements. Making this change will save resources both at the federal and state level. The CFSP/APSR and CFSR.PIP process should be consolidated into one document and process. In doing this the ability of the ACF to focus on the most important factors for collected information about the outcomes could become more reliable and thereby lead to more constructive improvements in the overall system.

It is possible in the future to utilize data gathered from the NCANDS/AFCARS/ PIP reports collectively to identify potential target areas where the evidence of positive (or negative) outcomes for children could be addressed rather than consuming much needed time and resources in filing duplicate and often unnecessary reports. Data on volume and occurrence as often provided in these reports from states is important but does not need to be reported in three or more separate reports. Filing of this kind of data must become mandatory for all states, at least annually, in order that the data can be accurately used to address systemic or service concerns or accomplishments from a national perspective.

NCANDS reports for example must become a requirement for all states. These reports used in a consolidated way could be used as a national information resource bank for identifying targeted areas for concentrating resources, for stimulating new strategies and designing new services. For example, focused attention on developing alternative strategies to mitigate certain child neglect risk factors by funding prevention strategies could lead to the testing and development of new ways to reduce the incidence of child neglect. In the current NCANDS format and under the existing reporting requirements its' use for monitoring would be limited. It would be more beneficial to states to develop NCANDS into a national data collection system that accurately reflects the census from all states providing all child protective data on investigations and assessments resulting in accurate data upon which to base the development of potential new service areas for attention, nationally.

The existing AFCARS report that provides the data required for the CFSRs is a reasonable way to gather the data, however, the weakness would appear to be in the process that is used in the monitoring of the PIPs. Consideration should be given to developing a more consistent and structured process for monitoring the level of conformity using a consolidated system for reporting states compliance with child welfare program and service requirements.

3. What role should the child welfare case management information system or systems that States/Tribes/local agencies use for case management or quality assurance purposes play in a Federal monitoring process?

Management information systems should provide continuous documentation of the case management activities that are being used in different areas of the country. Case management information systems should be used to provide information about the need for specific services; the effectiveness of key practices and service gaps especially indicators of disparities in access to treatment. Monitoring in this case should not be designed to assess a rating but instead should be used to provide information that can be shared between states to support and improve case management practices in general. Data collected on a national level should provide information

that informs planning for the utilization of resources to effectively address unmet needs that are documented. Management information systems should be used to establish an accurate and reliable process for determining unmet needs and identifying disparities in treatment.

4. What roles should State/Tribal/ local child welfare agencies play in establishing targets for improvement and monitoring performance towards those targets? What role should other stakeholders, such as courts, clients and other child-serving agencies play?

Engaging stakeholders, the courts, parents and other community members in the process of establishing targets for improvements should be an essential part of the process whereby child welfare agencies maintain the capacity to effectively support and meet the needs of children. A community based child protection system is the key to maintaining services that are relevant for children today. It is the process that ensures that the programs and services are equipped with the understanding, knowledge and capability to utilize the strengths of families and their communities in the delivery of services. ACF should encourage and financially support states/Tribal/local agencies in their efforts to support family and community engagement models that are culturally relevant in all aspects of service delivery from the point of entry through the provision of programs and services.

5. In what ways should targets and performance goals be informed by and integrated with other Federal child welfare oversight efforts?

Target and performance goals should be integrated into the reporting and accountability systems that are already in place by devising methods that allow for concurrent review and monitoring. The process of integrating these reporting requirements into the existing processes would eliminate duplicating the review work and especially documenting and monitoring procedures and should be designed to be captured by using existing or newly created technology to the fullest extent possible. To ensure fairness, ACF should develop an agreed upon process to establish the targets and performance goals prior to implementing the unified process for the reviews and monitoring. Targets and performance goals should include the reduction of racial disproportionality in child welfare service systems.

6. What specific strategies, supports, incentives, or penalties are needed to ensure continued quality improvement and achievement of positive outcomes for children and families that are in substantial conformity with Federal child welfare laws?

The Black Administrators in Child Welfare, Inc. has recently released a publication that identifies 10 Racial Equity Strategy areas for Improving Outcomes for African American Children in Child Welfare.” We are attaching to this questionnaire a copy of this report that responds specifically to this question. We believe that the strategies that we have outlined offer a series of specific areas around which attention should be directed for states and local agencies that are sincere in their desire to improve outcomes for all children. We would recommend that ACF consider incorporating many of these recommendations into the framework around which these questions are being asked.

7. In light of the ability of Tribes to directly operate title IV–E programs through recent changes in the statute, in what ways, if any, should a Federal review process focus on services delivered to Indian children?

No comment

8. Are there examples of other review protocols, either in child welfare or related fields, in which Tribal/State/local governments participate that might inform CB's approach to reviewing child welfare systems?

No comment