

May 20, 2011

Jan Rothstein

Division of Policy

Children's Bureau

Administration on Children, Youth and Families

Administration for Children and Families

1250 Maryland Avenue, S.W., 8th Floor

Washington, DC 20024

RE: 45 CFR Parts 1355, 1356 and 1357, Federal Monitoring of Child and Family Service Programs; Request for Public Comment and Consultation Meetings

Posted on: Federal eRulemaking Portal: <http://www.regulations.gov>

Email to: CBComments@acf.hhs.gov

Subject Line: Comments on the CFSR *Federal Register* Notice/Vol. 76, No. 65/Tuesday, April 5, 2011/Proposed Rules

Dear Ms. Rothstein:

The Connecticut Department of Children and Families respectfully submit these comments in response to the "Federal Monitoring of Child and Family Service Programs; Request for Public Comment and Consultation Meetings" that was issued by the Administration for Children and Families (ACF) on April 5, 2011.

Connecticut Department of Children and Families (DCF) would like to formally endorse the comments and recommendations submitted by the American Public Human Services Association (APHSA). Connecticut participated in the formulation of this document in two significant ways:

1) a team of Connecticut DCF staff with significant CFSR experience, led by the Chief of Quality and Planning and CFSR Coordinator, participated in the state feedback opportunities led by APHSA, and 2) a leader in our Quality and Planning team, who oversees qualitative and quantitative evaluation work including Connecticut's qualitative case review program (known as Connecticut Comprehensive Outcomes Review), was an active participant and major contributor on the Expert Panel convened by APHSA to formulate the Recommendations document.

Connecticut recognizes that the Child and Family Services Review has positively impacted the field of child welfare by highlighting critical aspects of quality child welfare practice, including a wide range of stakeholders, and pushing and supporting important reform. Connecticut, along with the rest of states, has become stronger at self-monitoring as a result. In fact, in 2008 Connecticut embraced the CFSR review approach internally by developing the Connecticut Comprehensive Outcomes Review (CCOR) program modeled after the CFSR to promote even more learning and to support stronger and more localized quality improvement planning. After three years of operating that program, all of our fifteen local area offices have undergone a CCOR. We are now developing plans for a revised CCOR program that we are confident will lead to clearer insights and more targeted change efforts. Among the key improvements will be a richer analysis of data, the incorporation of the agency's practice model in the case review protocol, and a case selection strategy that is data informed and matched to both local and statewide practice priorities. The very principles of these and other changes are in line with the model of accountability and quality improvement that is articulated in the APHSA *Recommendations* document and that we hope will be the foundation for the new CFSR. The bullet points listed below highlight some of the main aspects of that proposal that we endorse, but we refer you to the APHSA document for the full proposal.

Questions

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?

Combine the CFSR/PIP process with the CFSP/PSR to reduce redundancy, create better alignment and strengthen the strategic planning process

Rather than conducting onsite reviews on behalf of states on an infrequent basis, work with states to become self-evaluating and self correcting by supporting states in operating well functioning QI systems.

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?

Data or measures from the nation's child welfare databases should only be used by each state to look at its own performance and to set improvement goals against its own baseline. These standards should be state-specific and not result in national standards.

The current national data, specifically AFCARS, need refinement to provide a clear picture of the quality of interventions and the level of outcomes achieved. States need multi-year longitudinal data to provide a valid picture of child welfare outcomes.

Measures should be constructed to provide a valid picture of performance in key child welfare outcome areas, and performance should be examined and understood by population strata and with regard to how measures relate to each other.

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?

State information systems must be relied upon to capture key facts that the state relies on to gauge performance and that satisfy the federal government's expectations for data.

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?

Child welfare agencies should establish their own targets for improvement and be held accountable to monitor performance towards those targets. Key stakeholders should be active participants in evaluating performance and supporting change efforts. To the extent stakeholders are responsible for aspects of these change, they too should take part in establishing targets and monitoring their own performance.

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

Combine the CFSR/PIP process with the CFSP/APSR to reduce redundancy, create better alignment and strengthen the strategic planning process.

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 insubstantial conformity with Federal child welfare laws?

Incentives have proven to be very effective at promoting innovation and improving outcomes. Incentives should be tied to achieving desired outcomes.

Connecticut discourages the use of penalties. When tied to performance, penalties do not motivate states to set ambitious goals. Rather, they inspire defensiveness. If a penalty structure is to be used, it would be most reasonable to withhold funds if a state does not make good faith efforts to make improvement in deficient performance areas.

We are grateful to have the opportunity to provide these comments on how the CFSR program can be improved. We are optimistic that changes such as those outlined in the APHSA document will enable child welfare agencies to advance the work in significant ways.

Respectfully submitted,

Fernando J. Muñoz, MPA
Chief of Quality and Planning
Department of Children and Families
505 Hudson Street
Hartford, CT 06106
(860) 550-6304
Fernando.Muniz@ct.gov