



Summit County
CHILDREN SERVICES

Building Families . . . Building Futures

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May 12, 2011

Jan Rothstein, Division of Policy
Children's Bureau
Administration on Children, Youth and Families
Administration for Children and Families
1250 Maryland Avenue, SW., 8th Floor
Washington, DC20024

Re: Comments on CFSR Federal Register Notice

Dear Ms. Rothstein,

Summit County Children Services thanks you for the opportunity to respond to the Public Comment Request regarding the Child and Family Services Reviews.

Summit County Children Services is a county operated child welfare agency located in Akron, Ohio supported by a combination of federal, state and local funding. The population of Summit County is 542,405 according to 2009 Census estimates. Summit County Children Services provides services to abused, neglected and dependent children and their families which include child protection, foster and kinship care, adoption, independent living and transitional housing for youth emancipating from agency care. In addition, Summit County Children Services has demonstrated strong partnerships and collaborations with community agencies in the delivery of best practice quality services.

It is Summit County Children Services' belief that the Child and Family Services Review (CFSR) implementation has positively impacted child welfare practices by instituting best practice standards both locally and nationwide. Through this review, established outcome measures focus on improving practices in a thorough consistent manner. One of the most significant accomplishments is that all child welfare outcomes are measured through one review process across the nation.

The review process encourages agencies to make changes in practice where positive outcomes have been demonstrated elsewhere in the state or nation. Such outcomes support replication and implementation of new programs/models. The CFSR outcomes provide comparisons of local and national trends in child welfare and identify agencies who demonstrate positive outcomes through their practices. Technical assistance from CFSR could be provided in areas where additional assistance is necessary.

Although the CFSR initiative lays a positive foundation for best practices, its implementation is perceived as a negative process with unobtainable outcomes. No state has achieved all of the ever increasing benchmark standards. Threats of negative

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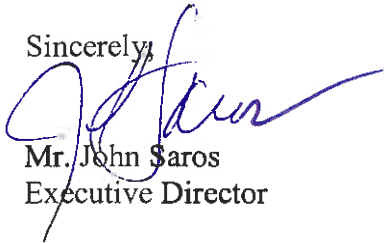
sanctions are built into the CFSR and it lacks positive incentives for success. The federal government's positive initiative has turned into a process with negative sanctions.

Unfortunately, federal funding of child welfare services is not linked to CFSR outcomes. Title IV-E funding is restricted to payment of placement services. Flexible funding of Title IV-E dollars would allow for opportunities to support CFSR outcomes and best practice. Such flexible funding would support creative planning in meeting the needs of each county's unique service population and service needs. Funding of services such as home based services, parenting classes; domestic violence services are examples that support reunification, prevention of maltreatment and reduce reentry into substitute care.

Nationwide, states are held to the CFSR expectations without consideration of the available community resources required to achieve the desired outcomes. Such resources include the level of child welfare funding (state and local), staffing and community resources.

Further discussion about the flexible use of IV-E funding, available agency and community resources and positive initiatives are critical, as we continue to strive to meet the benchmarks that address child safety, permanency and wellbeing.

Sincerely,



Mr. John Saros
Executive Director

CC: Crystal Ward Allen
Public Children Services Association of Ohio