Father Flanagan's Boys' Home
Written Comments on Child and Family Services Reviews
Federal Register Notice

Thank you for providing us the opportunity to submit written comments to the Administration for Children and Families (ACF) on the Child and Family Service Reviews (CFSR). As one of the largest nonprofit, nonsectarian child and family care organizations in the country, Father Flanagan's Boys' Home (DBA Boys Town) offers a broad spectrum of children and family services through our Integrated Continuum of Care^{SM}. Founded in 1917, we provide a treatment model that is safe, humane, effective, and consistently implemented at its 12 affiliate sites across the country.

In addition to our experience as a provider of child welfare services through State, local and Federal contracts and grants, we have two other roles which we have drawn upon in which to base our CFSR comments and recommendations. First, through a separate nonprofit child- and family-serving corporation, Boys Town NE/IA is one of four agencies that make up one of two Lead Agencies for the provision of child welfare services in the eastern section of Nebraska (encompassing the counties that comprise the Omaha metropolitan area). This privatization project has afforded first-hand experience in conformity with Federal child welfare goals and practice requirements. Additionally, we have been fortunate to have one of our Senior Vice Presidents selected to participate as a reviewer in a recent CFSR for the State of Nebraska. The training and focused process of the on-site review was a positive learning experience.

Our comments have been divided into topics correlating with one or more of the questions posed by ACF in the April 5 2011 Federal Register or to the on-site CFSR process.

Topic	Comments	Recommendations	Corresponding Question(s) or Section of the Review Process
On-Site Reviewers	• The on-site review training is intense, focused and prepared the reviewer for the work to be accomplished. • Federal reviewers may be more schooled and rigid in the review process and less familiar with field work; State and Selected reviewers may tend to be more practical in their interpretation of the indicators. • The gap between emphasis on process and experience in the field needs to be narrowed[1].	• Provide joint training with Federal, State and Selected reviewers with attention to calibration of the interpretation and ratings of indicators. • Screen Federal reviewers for those with practical field experience with children and families.	• On-Site Review • Question # 1

---

[1] One family reviewed by the CFSR team was living in a truck. The federal reviewer found the well-being, permanency and other indicators to conform to the "book", however other families living in a house or apartment albeit without amenities/basics were not found to conform to the indicators.

Topic	Comments	Recommendations	Corresponding Question(s) or Section of the Review Process
On-Site Review Process	• CFSR process becomes mired in technicalities after Level 1 and 2 QA discussions rather than focused on applying the indicators to actual life situations. • State data systems are typically not at the level to provide accurate data to use for baseline outcomes and measuring improvement. • Case selection is randomized for review process; two cases reviewed per team. • Federal reviewers are paid for their work; Selected reviewers are not.	• If requiring a State to input data into a national system, this data system should also be accessed (extracted from) for the review. However, the state should be expected to use QA procedures that ensure the completeness and accuracy of the data. • Data extracted from the data base should include measurable outcome data rather than process data (i.e., length of home visit and family members present vs. no. of home visits). • Use a window of time (i.e., expected time for youth to be returned home, achievement of permanency plan) to measure outcomes rather than calendar or fiscal year. • Provide incentives or grants to assist States in developing more robust, efficient data systems given that most SACWIS systems are notoriously cumbersome and fail to include needed information. • Consider compensation for Selected reviewers.	• On-Site Review • Questions # 1, 2, 3, 6

Topic	Comments	Recommendations	Corresponding Question(s) or Section of the Review Process
Core Indicators	• There are many subsets to core indicators; all valued equally • The indicators do not take into consideration appropriate movement of a child and family within an integrated continuum • The power and importance of education is not a valued indicator	• Determine priority indicators and weight them accordingly; if the State has limited resources to correct all deficiencies, focus attention on the critical not the minute. • When the family has been appropriately involved in a child's treatment and the child is ready for a level of care change the level of care change should not be jeopardized due the potential for a negative CFSR rating. Include indicators that determine whether the child and family have received the right service, at the right time for the right length of time. • Education should be a priority indicator – testing scores; grade level readiness; foster youth compared to general population; special assistance; etc. • Native Indian children in the child welfare system should have the same safeguards as that of other children in the child welfare system; indicators should be tailored to the Tribal culture nature.	• Questions # 1, 2, 3, 7
Stakeholder Input	• An emphasis on stakeholder input is important to capture best practice and innovative system improvements	• Through the CFSR review process require States to demonstrate how they incorporate stakeholder input into QM and how they encourage public/private partnership.	• Questions # 1, 3, 4