



**State of Florida
Department of Children and Families**

Rick Scott
Governor

David E. Wilkins
Secretary

May 13, 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, D.C.

RE: Florida Comments on CFRS Federal Register Notice

Dear Ms. Rothstein:

Thank you for the opportunity to provide comments and recommendations for improving the Child and Family Services Review (CFSR) and Program Improvement Plan (PIP) Process. Since October 2010, Florida has been engaged with Casey Family Programs, the American Public Human Services Association, and the National Association of Public Child Welfare Administrators in the review and discussions related to improving the current CFRS and PIP process. We believe the CFRS process has been a valuable tool to guide Florida's child welfare improvement plan. We also believe it is time to make some substantial changes to the process. Therefore, Florida respectfully recommends that the suggestions and recommendations contained in the CFRS/PIP Redesign Report submitted by APHSA and NAPCWA dated May 9, 2011 be adopted. These recommendations are as follows:

- 1. Fold the CFRS/PIP into the CFSP/APSR.**
 - a. Develop a five-year cycle that builds on and encourages continuous improvement and provides the accountability required of state, local and tribal child welfare programs.
 - b. Simplify and reorganize the structure of the current reporting mechanisms into one concise document that would be submitted every five years as the comprehensive state plan (CFSP) with annual addendums (APSR).
 - c. Adjust strategies (not goals) as needed.

- 2. Develop refined measures that are accurate, valid and reliable and that child welfare stakeholders and staff can easily understand.**
 - a. Examine the improvement of the state's child welfare system across time and against its own baseline.
 - b. Analyze data in a fashion that promotes national dialogue, but not for the imposition of "one size fits all" national standards.
 - c. Gather and analyze data that yields state-specific information about client populations that can easily be applied as a predictive tool for forecasting change in client needs and how to adjust programs accordingly.
 - d. Analyze data in a manner that facilitates understanding of how one area of practice affects another, either positively or negatively, in easy-to-understand

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formats and presents a clear and concise picture of how a state's systems are functioning.

- e. Provide a powerful national longitudinal database for continuing child welfare improvement.
- f. Clearly define every named unit of data (data element) gathered.
- g. Examine the potential use of every data element collected and eliminate any data element that serves no explicit purpose.
- h. Define specific measures to evaluate how Indian children are being treated by the child welfare system in terms of their unique needs and legal requirements (and how this can be improved) and ensure that these measures and resultant improvement plans are developed in collaboration with tribes and appropriate Indian organizations.

3. Rely on states' quality assurance and continuous quality improvement systems to drive state performance and meet federal review and accountability requirements.

- a. Require each state to have an adequate continuous improvement program and provide technical assistance and increased resources to design and implement needed change.
- b. Develop guidelines for viable state continuous quality improvement systems that allow states to routinely employ their own review tools or adapt and integrate federal ones as necessary.
- c. Assist states that have the capacity to gather optional data that may inform practice and research, without setting a standard connected to accountability.
- d. Develop federal regulations and provide federal funding and leadership to enable state child welfare information management systems to gather well-being data (medical, mental health, education) from other systems under the federal health and human services umbrella.
- e. Methods for assessing systemic factors should be clearly defined, transparent and not subject to personal beliefs or biases.
- f. Effectively use both state and federal resources to leverage capacity to improve outcomes for children, youth and families who come to the attention of the public child welfare system.

4. Align federal resources with federal requirements and work cohesively with the states for continuous improvement in child welfare.

- a. Provide clear federal guidance on what portions of a state's CQI/QA activities can be supported within the training regulations.
- b. Examine ways to re-invest both state and federal savings that result from folding the CFSR/PIP into the CFSP/APSR and using states' CQI/QA to strengthen states' self-evaluation capacity and continuous improvement efforts.
- c. Restructure the work of the National Resource Centers (NRCs) and Implementation Centers (ICs) to offer more relevant, useful and timely technical assistance.
- d. Develop regulations at the federal Department of Health and Human Services level and use the Request for Proposal (RFP) process to build and strengthen cross-system work, hold all divisions accountable for the services under their auspices, and allow the blending and braiding of funding streams.

- e. Examine ways that the federal IV-E funding for SACWIS can be used with a greater degree of flexibility to keep pace with technological developments and agency needs.
- f. Seek ways to use available federal funds flexibly.
- g. Establish meaningful methods of accountability that promote performance.

5. Establish mechanisms to promote performance improvements and innovation that can be equitably applied across the nation.

- a. Place a moratorium on any withholding of funds until a means is developed to ensure that the withholding of funds is based on accurate performance measures and standards that can be applied equitably across the nation.
- b. Redefine nonconformity ("not in substantial conformity") to mean a lack of good faith effort or willful disregard on the part of the state of any plan for improvement mutually agreed upon between the state and federal government.
- c. Revise regulations to ensure that if any withholding of funds is necessary, it is time limited to the period during which the state has not demonstrated good-faith efforts to improve performance.

One area of disagreement with the APHSA/NAPCWA report is the recommendation that "Entry Rate" data be adopted as one of the federal outcome measures (page 17, 1st measure). Child welfare professionals are unable to define a good or bad "Entry Rate". Although this is good information to report and understand about states, we do not believe it should be a federal outcome measure.

Thank you for the opportunity to comment on the CF SR and PIP process. We hope that Florida will be actively involved in implementation of proposed changes. If you have any questions or need additional information please contact me at (850) 922-2298 or Eleese Davis at (850) 717-4650 or email at eleese_davis@dcf.state.fl.us.

Sincerely,



Jamie Self, Ed.D., Director
Office of Family and Community Services

cc: Carola Pike, Administration for Children and Families, Children's Bureau, Region IV
Bertha Levine, Senior Program Associate, American Public Human Services Association
Paul DiLorenzo, Casey Family Programs