

Dear Commissioner Samuels,

Thank you for this opportunity to comment on the Federal Monitoring of Child and Family Service Programs. IARCCA is a state association of 109 agencies in Indiana that provide services to abused, neglected, and delinquent children and their families. We work in partnership with the Indiana Department of Child Services to promote the success of children and their families through the provision of services that meet the needs of children and their families. We submit these suggestions by question number as instructed in The Federal Register.

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?* IARCCA has long supported the measurement of outcomes in the private sector in order to inform service delivery and improve services to vulnerable children and their families. Our research over the past 12 years is published at www.evaluateoutcomesnow.org. Our association will be pleased to be involved in any discussion at the federal level regarding how outcomes that are measured in private sector services under the provisions of contracts with the State child welfare agency can best be utilized to assess State performance. Additionally, we recommend that the CFSR consider how training funds are utilized to improve the quality of services, with a particular focus on how States utilize Title IV-E training funds under the provisions of the Fostering Connections to Success and Increasing Adoptions Act of 2008 for multi-disciplinary training. It has been our experience that training dollars are among the first areas to be cut when budgets are tight. As a former public agency administrator, I know the value of training for staff who work with these vulnerable children and their families. It is important that training funds be used in joint public-private training, as well as to inform those working most directly with the children and families on the latest research and best practices. We respectfully request that ACF examine the barriers to full usage of Title IV-E training dollars and promote their use to the fullest extent for public-private sector joint training, in order to improve outcomes for children and families.

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? IARCCA agencies are particularly concerned that the federal and state statutes related to the placement of children in the least restrictive and most family-like setting are utilized without the corresponding statutory language related to assurance that the setting is most appropriate to meet the special needs of the child. Too often, our agencies receive children into placement who been failed by a number of previous placements, when the earlier placements might more appropriately have been made at a more restrictive level that better met the children's needs. Rather than policies which force a child to "fail up" the level of restrictiveness of placement in out-of-home care, we would propose a more accurate initial assessment of children's needs that includes a collaborative approach with private sector partners to attain the appropriate level of placement and services.

Such assessment policies and practices should include provisions to quickly step the children down to lower levels of restrictiveness as progress is made. We ask that the CFSR include consideration of these factors in the child well-being on-site review. IARCCA is also a sponsor of the Building Bridges Initiative of the federal SAMHSA, which promotes the inclusion of families and children in treatment planning and decision-making through family-driven, youth-guided practices. We hope to see a connection to the Building Bridges Initiative in the CFSR for child welfare children, with consideration for the circumstances of individual children's situations. In responding to this question, we also ask that you consider our above comments related to the use of Title IV-E training dollars to better inform practice within the public and private sectors of child-serving agencies.

We appreciate this opportunity to comment. I particularly appreciated the opportunity to meet you, Commissioner Samuels, during your recent discussion with the National Organization of State Associations for Children (NOSAC). Thank you for your service to children, and we appreciate your consideration of these comments.

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