



Minnesota Department of **Human Services**

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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., 8<sup>th</sup> Floor  
Washington, DC 20024

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

Posted on: E-Mail to [CBComments@acf.hhs.gov](mailto: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 Minnesota Department of Human Services, Child Safety and Permanency Division (MN DHS) respectfully submits 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.

Generally, MN DHS concurs with ACF that the CFSR has been a contributing factor to improving outcomes for children and families and improving the quality and capacity of state child welfare systems for doing so. MN DHS places a high value on the system of accountability based on performance monitoring, measurement and reporting created by the CFSR. We are interested in maintaining these components of the CFSR. There are however, components of the process and procedures of the CFSR that could be improved in the interest of improving the means of accountability and measures of performance; and promoting a more effective and seamless approach for planning and achieving continuous quality improvement.

MN DHS was an active participant and contributor to developing the recommendations submitted in response to the federal register announcement by the Association of Public Human Services Association (APHSA) and the National Association of Public Child Welfare Administrators (NAPCWA) on May 12, 2011. The approach used by APHSA and NAPCWA to develop recommendations was inclusive of 49

states represented by over 250 individuals serving on state public child welfare agency teams; MN DHS convened a ten person state team as part of this process. APHSA and NAPCWA convened an expert panel representing the child welfare and related fields to frame recommendations; MN DHS was also a contributing member of the expert panel.

Given the high degree of involvement and contribution to the APHSA and NAPCWA comments and corresponding recommendations, the MN DHS wishes to comment as part of the public record our concurrence and endorsement of the APHSA and NAPCWA comments and recommendations found at <http://www.regulations.gov>.

Thank you for the opportunity to provide comment on proposed improvements to the CFSR process.

Respectfully,

*Christeen Borsheim*

Christeen Borsheim, Director  
Child Safety and Permanency Division  
Minnesota Department of Human Services