

**Response to CFSR Questions**  
**April 18, 2011**

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?

Comment: The best measures for systemic factors would be based in outcomes-so rather than measuring whether the state has a training program focus on the success/impacts of the training. This would require states employ a credible evaluation program preferably with some ability to provide an independent point of view.

A CQI/QA system should be able to demonstrate effectiveness over time. For example the interventions employed to decrease child fatalities should result in a decrease of child deaths-if not the state needs to demonstrate the capacity to assess and change direction (new strategies)

Case Plans need to be assessed for quality from a clinical point of view and with at least some ability to make independent assessments of the case record.

2. To what extent should data or measures from national child welfare databases (*e.g.*, the Adoption and Foster Care Analysis and Reporting System, the National Child Abuse and Neglect Data System) be used in a Federal monitoring process and what measures are important for State/Tribal/local accountability?

We continue to need national level information and states and tribes should remain accountable for mandated reporting requirements. The limitations of those measures need to be transparent and additional measures employed to round out the picture from a national perspective.

Tribes and States should be held to the same standard. The measures a state would use should be guided and assessed by CB. Certain measures are more significant than others and have more value such as the requirement for caseworker to see the child in care every month a very fundamental and critical measure. State child welfare should not be held accountable for interventions or supports over which they have no control for improve. However-Ongoing efforts to collaborate with those systems should continue to be assessed.

3. What role should the child welfare case management information system or systems that States/Tribes/local agencies use for case management or quality assurance purposes play in a Federal monitoring process?

Those state and tribal systems should meet a minimum standard including the measures used , the nature of the QI program and the presence of a reasonable level of independence by the evaluation (division or program). Federal monitoring process should set those standards in collaboration with states and tribes.

4. What roles should State/Tribal/local child welfare agencies play in establishing targets for improvement and monitoring performance towards those targets? What role should other stakeholders, such as courts, clients and other child-serving agencies play?

Tribes and States should set the targets in a negotiated process with the Federal Monitors. The process that states and tribes use to determine the targets should be required to be a formal collaboration process that involves in a meaningful way-stakeholders and especially courts, professionals and clients.

5. In what ways should targets and performance goals be informed by and integrated with other Federal child welfare oversight efforts?

There should be a high level of integration. We need to continue to move away from working 'in silos'. Understanding and developing a shared mission/vision would be facilitated by integrated oversight efforts. It remains critical that the integration not impose changes that the Child Welfare Agency cannot impact.

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?

States and Tribes will respond to fiscal penalties. However there needs to be a comprehensive and thorough process of engagement in the effort to make improvements prior to penalties being applied.

7. In light of the ability of Tribes to directly operate title IV–E programs through recent changes in the statute, in what ways, if any, should a Federal review process focus on services delivered to Indian children?

At the same level of scrutiny applied to states that benefit from taxpayers contributions. The Tribes should in no way be thought to be ‘entitled’. Indian children and families should have the same benefit of quality expectations as state children.

Thank you for the opportunity to respond.