

May 19, 2011

The Honorable Bryan Samuels, Commissioner

Administration on Children, Youth and Families, ACF

1250 Maryland Ave, SW, 8th Floor

Washington, D.C. 20024

Re: 45 CFR Parts 1355, 1356, and 1357

Federal Monitoring of Child and Family Service Programs; Request for Public Comment

Dear Commissioner Samuels:

The National Conference of State Legislatures (NCSL) appreciates the opportunity to provide feedback to the Children's Bureau regarding the review of its Child and Family Services Reviews (CFSRs). NCSL supports the continuation of a monitoring and review system that fairly assesses state performance and provides tools for improvement. NCSL has concerns about the current affect of CFSRs on state services and budgets. The CFSR process, combined with all the other audits and reporting for child welfare programs, creates duplication of effort and requires extensive state staff time and resources to comply.

For example, the CFSR and proceeding Program Improvement Plans (PIP) are timed differently than the Child and Family Service Plan (CFSP) five-year cycle. In addition to these three processes, there is the Annual Progress Services Report (APSR), Title IV-E audits and SACWIS adjustments. Each of these processes requires data and reporting, with lag times and uneven levels of activity. In addition, to guide the federal personnel conducting the review and provide the requested information requires a great deal of state time and resources.

When a state needs to make an adjustment to their child welfare system due to the outcome of reviews, often there needs to be a change in state statutory requirements. The timeframes outlined in improvement plans or penalty abeyance may or may not take into account state legislative cycles. Several state legislatures meet on a bi-annual basis and many additional legislatures meet only part of

the year. When reviewing the CFSR process, NCSL requests that state legislators be consulted and timeframes for state legislative sessions be taken into consideration.

Finally, there needs to be improved analysis and guidance from the Children's Bureau in conducting an overview of the CFSRs. Improved analysis would assist states in continuing to improve their child welfare policies and practice.

We look forward to working with you in reviewing the CFSR process. To discuss this further, please contact Sheri Steisel (sheri.steisel@ncsl.org; 202-624-8693), or Emily Wengrovius (emily.wengrovius@ncsl.org; 202-624-8171).

Sincerely,

Representative Mary Jane Wallner
New Hampshire House of Representatives
Chair, NCSL Standing Committee on
on
Human Services and Welfare

Representative Wes Keller
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