

From: Kristy Lamont [kqlamont@aspi.net]
Sent: Friday, May 20, 2011 3:52 PM
To: ACF CBComments
Subject: "Comments on CFSR"

Thank you for the opportunity to submit comments regarding the Child and Family Service Reviews (CFSRs). Below are some general comments.

1. The CFSR and corresponding Program Improvement Plan informs agency priorities and statewide improvement efforts and, therefore, should be expanded to include educational stability and success.
2. "Other Planned Permanent Living Arrangement" is an area that could benefit from additional review. The low number of applicable cases last reviewed in our state (7) makes it difficult to identify areas related to "Other Planned Permanent Living Arrangement" as either a "Strength" or "Area Needing Improvement". Additionally, the age of children and youth should be reviewed and re-evaluated and comments included whenever a review is for young children, especially children 10 and younger (there were 2 in our last review) for whom "Other Planned Permanent Living Arrangement" is their goal. The age category of "older than age 10 but younger than age 16" is too large a span and includes children as young as 5th and 6th grades as well as youth in high school. This option is the least permanent and should be limited to older youth, with youth being at least 16 years of age when "Other Planned Permanent Living Arrangement" may be an appropriate plan.

Additionally, making a finding as a "Strength" that an agency has "made concerted efforts to ensure long-term placement for the child and/or to provide the necessary service to prepare the child for independent living" makes it unclear exactly what has been done for a youth. The current language allows the agency to do either of these two things, or both. This means that it could be identified as a "Strength" whenever a youth has a place where he/she is able to live, when the youth has only been provided the necessary services to be prepared for independent living, or both. The first option seems preferable as it includes a place for a youth to live (permanently, it is hoped) and thus provides a much better prospect for a youth's short-term and long-term success. The latter, about a service (that is not defined) being provided to a youth, is less preferable and may put a youth at much greater risk for, among other things, homelessness.

Stakeholder interviews in this area included different opinions, making it difficult to draw conclusions from the information gathered.

Again, thank you for the opportunity provided to Court Improvement Projects to provide input on how the Children's Bureau monitors compliance with Title IV-B and Title IV-E requirements through the Child and Family Service Reviews.

Sincerely,

Kristin Lamont
New Hampshire Court Improvement Project