

Public comment from the NH Child Welfare Committee, May 20, 2011

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

a. Requirements for ICWA mandates have not been successfully monitored in the past. It is very heartening that the CFSR is reviewing this important Act for state compliance and setting goals for improvement in this crucial area. It is important that the BIA and ACF work together to effectively to ensure that Native American Indian children and their Tribes are getting the best possible opportunity to preserve cultural connections.

*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?*

a. In addition to reviews of specific child welfare interventions that result in substantiated or founded determinations, CFSR reviews should include reviews of child welfare/protection referrals that rise to the level that requires a face-to-face contact with children and family members, regardless of determination. Despite the fact that most referrals fitting this criteria do not result in substantiated/founded determinations, decisions made and actions taken during these assessments can result in significant impact on the children and families involved in these referrals.

b. The total number of case reviews conducted in the CFSR should include no less than 10% in which co-occurring allegations of child maltreatment and domestic violence exist in the accepted initial referral.

c. Many states report overrepresentation of minority children in child protective cases. However, frequently staff of the agencies investigating and serving children is under-representative of the minority populations served. Quality outcomes for children and families happen best when administered by people who understand the unique cultural aspects of the population. It would be very helpful if incentives for fair representation could be placed in the CFSR process.

*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?*

a. It is imperative that ACF and the BIA work cooperatively with each other and the Tribal governments receiving Title IV-E money to create an agreeable review process that fits the needs of the Tribe and the tribal families. Any federal review of Tribal programs should exist independent of the State review process in which the Tribe is located. The inclusion of Tribal reviews in State process creates an atmosphere where states actively work to discourage Tribes from developing their own programs. It is essential that Tribes be encouraged to operate their own programs, as they alone are the experts in what the needs of their families and children are.

*8. Are there examples of other review protocols, either in child welfare or related fields, in which Tribal/State/ local governments participate that might inform CB's approach to reviewing child welfare systems?*

a. NH DCYF currently adapted the CFSR model for its internal Case Practice Reviews. These reviews include child welfare/protection referrals that rise to the level that requires a face: face contact with children and family members, regardless of determination.