



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. 8th Floor
Washington, DC 20024

New York State
Office of
Children &
Family
Services

Dear Ms. Rothstein:

www.ocfs.state.ny.us

Andrew M. Cuomo
Governor

Gladys Carrión, Esq.
Commissioner

New York State (NYS) welcomes the opportunity to comment on the Child and Family Services Review (CFSR). We have participated in two rounds of the CFSR and overall find the initiative has positively influenced child welfare practice in NYS by helping the Office of Children and Family Services (OCFS) and our statewide partners, including local departments of social services, family courts, authorized child caring providers and sister state agencies, to focus on the key outcomes of safety, permanency and well-being.

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While we do support the initiative, we feel that certain modifications should be considered to make the process more effective and efficient. OCFS has actively participated with the American Public Human Services Association (APHSA) and its affiliate, the National Association of Public Welfare Administrators (NAPCWA), in the development of recommendations for process improvements. We strongly support their recommendations, and would like to highlight several of those that we find of utmost importance to NYS.

First, we recommend that the CFSR be a more targeted review. Currently, there are seven outcomes involving 23 case review items, and seven systemic factors involving 22 items. The sheer magnitude of the review results in program improvement plans that are required to address too many diverse issues, and not all issues are of equal importance.

We strongly support the elimination of the on-site case record review process. We have not found the on-site review to be particularly helpful, considering the limited number of cases actually reviewed and, in some instances, the use of isolated interview comments to judge a state's overall performance. In addition, the final report typically is received nearly a year after the on-site review and tends to slow down the momentum for change. The two on-site reviews we have experienced have not resulted in any findings beyond those noted in our Statewide Assessment.

We would find greater value in the completion of a more targeted statewide self-assessment, which includes the analysis of our state's performance data in consultation with relevant stakeholders. We strongly feel that upon completion of one's statewide self-assessment, a targeted program improvement plan can be developed. We also



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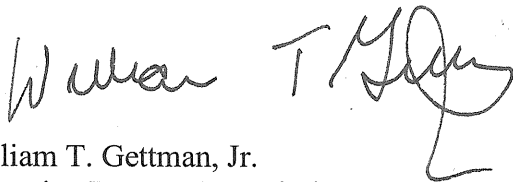
recommend changing the program improvement plan timeframe from the current two-year plan to a five-year plan. Two years is not enough time to see practice changes, especially in state supervised, locally administered states such as New York.

We support the use of data that is accurate, valid, reliable, and comprehensive to child welfare. We also feel strongly that states should not be compared to each other. There is too much variation between states to have accurate and meaningful comparisons. Rather, states should be measured against themselves. The establishment of state baselines, which could then be used prospectively to measure individual states' progress, would seem to be a more accurate, effective and informative way to measure performance.

Lastly, New York State would support the restructuring and refinement of the federal reporting by folding the CFSR into the Child and Family Services Plan/Annual Progress and Service Report. The current complex system of multiple reviews, reports and plans should be synchronized, thereby reducing duplication, cost and time

Thank you for the opportunity to comment. We look forward to changes to the current CFSR with the goal of improving child welfare practice in a meaningful way that meets the needs of both the federal and state governments and, most importantly, the children and families we are collectively assisting.

Sincerely,

A handwritten signature in black ink, appearing to read "William T. Gettman, Jr.", with a stylized flourish at the end.

William T. Gettman, Jr.
Executive Deputy Commissioner