



John B. Mattingly
Commissioner

May 20, 2011

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Jan Rothstein
Division of Policy
Children's Bureau
Administration on Children, Youth and Families
Administration for Children and Families
1250 Maryland Avenue SW 8th floor
Washington, DC 20024

Dear Ms. Rothstein:

New York City's Administration for Children's Services is respectfully submitting these comments in response to the "Federal Monitoring of Child and Family Service program; Request for Public Comment and Consultation Meetings", that was issued by the Administration for Children and Families (ACF) on April 5, 2011. As the city serving the largest population of children and families in the New York State child welfare system, the Administration for Children's Services welcomes the opportunity to provide feedback. Specifically, we support the comments and recommendations submitted by the American Public Human Services Association (APHSA) and its affiliate the National Association of Public Child Welfare Administrator (NAPCWA) submitted on May 12, 2011.

While we agree with most of the recommendations made by APHSA, in the interest of not repeating the recommendations made by APHSA, we are highlighting a few of the many recommendations that we feel are particularly relevant to New York City. We concur with the recommendation that the CFSR process should be streamlined by folding it into other similar federal reporting requirements. In addition to burdening the states, the CFSR onsite review process and reporting requirements divert resources at the local level which must respond to multiple reporting and oversight requirements imposed on localities by the states.

We agree with the emphasis on self-assessment and a continuous quality improvement process that involves a collaborative approach between the state and the federal government; including setting benchmarks at the state level, measuring state performance against those benchmarks, and targeting two to three key practice areas to improve at a time. This approach, if utilized at the state and the local level, will better support the efforts of states and localities to make change progressively, and to modify strategies along the way when an intervention is not working. We would add that involving the localities in the collaboration from the beginning would strengthen the approach particularly in state supervised and county administered child welfare

systems, and in cases where the state's performance depends largely on the outcomes of the counties serving the greater number of children and families.

We agree that it is important that data be collected, analyzed and reported in such a way so that the interrelationships between areas of practice are clear and understood by the frontline. There is one recommendation we do not fully support and that is population based foster care placement rates as an outcome measure. While it is important to monitor placement rates as they relate to other factors, we do not agree with setting targets on this measure because we believe that it could lead to withholding foster care when it is in the best interest of the child.

Lastly, we believe that APHSA makes an interesting point that the current financial penalty approach inherent on the CFSR be replaced. The loss of revenue could negatively impact efforts to improve on the state and local level, if the penalties are passed on. Instead we agree that implementing an incentive approach should be considered; that is more oversight if improvement is not made and the reward, less oversight.

In closing we thank you for the opportunity to respond on the proposed improvements in the CFSR and PIP process.

Sincerely,



John B. Mattingly
Commissioner

CC: Laura Velez, Deputy Commissioner, NYS Office of Children and Family Services
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