

**NATIONAL
CHILD ABUSE
COALITION**

1000 Vermont Ave., NW * Suite 700 * Washington * DC 20005

Phone 202-347-3666 * Email bircht@earthlink.net * Fax 202-289-0776

May 20, 2011

Jan Rothstein
Division of Policy
Children's Bureau, Administration on Children, Youth and Families
Administration for Children and Families
Department of Health and Human Services
1250 Maryland Ave, S.W., 8th Floor
Washington, D.C. 20024

Dear Ms. Rothstein:

The National Child Abuse Coalition's member organizations, with a shared commitment to protecting the safety of children and to preventing child abuse and neglect, appreciate this opportunity to offer comments on the Federal Monitoring of Child and Family Service Programs, as noticed in the *Federal Register* on April 5, 2011.

The Child and Family Service Review (CFSR) process embodies the federal government's responsibility to assist state, tribal and local governments in addressing the goal of achieving continuous quality improvement in the delivery of services to abused and neglected children. The current set of outcomes falls heavily on measuring conditions of foster care placements; there is very little attention given to preventive or protective services before a child is placed in out-of-home care. The CFSR is deficient in failing to measure or analyze adequately the performance of child protective service (CPS) agencies in serving children and families in-home prior to placement in foster care. Indeed, few of the measured outcomes address prevention.

To sharpen the focus of the CFSRs, the Coalition believes that the monitoring of child welfare services and the analysis of the data collected should encompass the full scope of child welfare to account for services at the front end of the system. We suggest that the CFSR process incorporate information from other national databases to capture the full picture of child welfare services; we urge attention in the CFSRs to practices and policies directed at state child protective services found in statutory authorities other than Title IV, namely those policies and procedures identified in the Child Abuse Prevention and Treatment Act (CAPTA) grants to states [42 U.S.C. 5106a] and community-based child abuse prevention grants [42 U.S.C. 5116] which are included in each state's integrated child welfare state plan.

In that regard, we are pleased to have this opportunity to respond here to specific questions posed in the notice in the *Federal Register* of April 5, 2011.

2. To what extent should data or measures from national child welfare databases (e.g., the Adoption and Foster Care Analysis and Reporting System, the National Child Abuse and Neglect Data System) be used in a Federal monitoring process and what measures are important for State/Tribal/local accountability?

Information collected annually through the National Child Abuse and Neglect Data System (NCANDS) could be included in the CFSRs to address practice at the front end of child welfare services. NCANDS could prove useful as a means, for example, of identifying which services children are receiving post-investigation. Longitudinal databases can best inform progress in state practice and nationally. By using an expanded set of measures, the Children's Bureau could compare the results from each state against a larger data set.

For example, reporting information could be used to expand upon our understanding of the recurrence of child abuse and/or neglect by enlarging the definition of what is meant by recurrence. Identifying the number of children who come to the attention of child welfare, without a substantiated finding of maltreatment, and then return again -- or multiple times -- to the attention of child welfare before a substantiated finding is registered would provide a sharper picture of the child welfare system's ability to provide preventive services when needed.

4. What role should State/Tribal/local child welfare agencies play in establishing targets for improvement and monitoring performance towards those targets? What role should other stakeholders, such as courts, clients and other child-serving agencies play?

Offering a meaningful role in the CFSR process to private providers and other public child-serving agencies would strengthen collaborations between CPS and community based child abuse prevention programs. While each sector has its own role to play in the spectrum of child welfare services, their various responsibilities and perspectives overlap and provide a more complete understanding in the assessment and identification of approaches to supporting continuous quality improvement.

Engaging preventive service providers in establishing targets for improvements and monitoring performance to reach those targets would contribute significantly to a stronger collaboration and partnership between child welfare agencies and those key services working toward the same goal to safeguard children and strengthen families.

Similarly, pediatricians and other health care providers can also play a critical role in preventing child maltreatment and identifying at-risk families. Engagement of the medical community can build stronger linkages between health care and child welfare services, providing a more holistic, comprehensive, and consistent set of messages and services to families.

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

By involving the federal government as partners with state, tribal and local governments in improving child welfare practice, the CFSR process offers an opportunity to expand the scope of attention to the delivery of services and integrate with other related and aligned statutory authorities. CAPTA, for example, identifies a number of requirements for state policies and procedures otherwise lacking attention in adequate implementation or assistance from HHS.

By using the CFSRs to address more fully the front-end practice, attention could be paid to improving such practice concerns – addressed in CAPTA – as: the provision of safe care for infants born substance-exposed; ensuring that children under the age of three who are substantiated victims of maltreatment are referred IDEA Part C services for evaluation; promoting collaboration between CPS and family violence services; and addressing the implementation of a

differential response to reports of child maltreatment. Moreover, such partnerships, similar to one set forth in the joint information memorandum issued by the Office of Head Start and the Administration for Children Youth and Families (ACF-IM-HS-10-04) which encourages grantees to enter into formalized agreements with local child welfare offices, should be promoted to improve the services offered to children and families most at risk.

We appreciate this opportunity to participate in the reassessment of how the CFSR can identify enhancements and improvements in the child welfare system, and we look forward to being of further assistance as appropriate.

Sincerely,

Thomas Birch
Legislative Counsel

Member Organizations: Alliance for Children and Families, American Academy of Pediatrics, American Bar Association, American Humane Association, American Professional Society on the Abuse of Children, American Psychological Association, Association of University Centers on Disabilities, Child Welfare League of America, Children and Family Futures, Children's Advocacy Institute, Children's Defense Fund, Every Child Matters Education Fund, First Focus, Futures Without Violence, National Alliance of Children's Trust and Prevention Funds, National Association of Counsel for Children, National Association of Social Workers, National Center for State Courts, National CASA Association, National Education Association, National Exchange Club Foundation, National Network to End Domestic Violence, National Respite Coalition, Parents Anonymous, Prevent Child Abuse America, Stop It Now!, Voices for America's Children