



STATE OF TENNESSEE
DEPARTMENT OF CHILDREN'S SERVICES
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NASHVILLE, TENNESSEE 37243-1290

MEMORANDUM

To: Children's Bureau Representative

From: Bonnie Hommrich, ^{BIH} Deputy Commissioner, Protection and Permanency

Date: May 20, 2011

Re: Federal Monitoring of Child and Family Service Programs; Request for Public Comment and Consultation Meetings – State of Tennessee recommendations

This memo is written in response to the federal register requesting comments on the CFSR and recommendation for a redesign of this process.

A small team of TN Department of Children's Services staff met to identify concerns and possible solutions to concerns about the CFSR. From that discussion the following recommendations and proposed solutions were identified:

- Use existing QA systems within a State: The CFSR should build upon of a state's quality improvement system, not create a new process for the state to adopt to complete the review. For instance, TN uses the QSR within its QA system. The CFSR process could use the results of the QSR to assess the state's performance.
- Ensure shared responsibility between the state's public child welfare agency, and stakeholders on CFSR results: The public child welfare agency should not be the only entity responsible for ensuring improvements in the state's child welfare system. Stakeholder agencies need to be held equally responsible for successes identified through the CFSR, and any penalties attached to nonconformity. We would like to see greater support from ACF through the implementation of monetary incentives to guarantee community involvement.

- Title IV-B, CFSR, and PIP alignment: These processes currently do not support each other, and appear to be disconnected. The five-year plan, with annual updates could replace the Statewide Assessment and lead to a more consultative focus.
- Identify other ways to provide states with incentives for good performance: TN has been ranked as #1 in timeliness to adoption in the past. However, because of our success in that area and an overall reduction in custodial numbers, there are fewer children and youth available for adoption in the state. These positive outcomes eliminate the opportunity for a monetary reward from the Adoption Incentive Program.
- Clearly defined data measures: The CFSR process must include data measures that are clear, relevant, and easily comprehended by staff working within the public child welfare system. Implementing a longitudinal data and analytic process, tied to understandable measures, will be of greater value to states to inform ongoing quality improvement efforts.

On a final note, two members of the TN DCS staff participated on the CFSR-PIP redesign teams organized by APHSA and NAPCWA. We fully support the recommendations and proposals identified through the work of the states that participated on these teams, and outlined in the final document released by APHSA and NAPCWA.