

SUPREME COURT OF VERMONT  
109 STATE STREET  
MONTPELIER, VERMONT  
05609-0801

CHAMBERS OF  
PAUL L. REIBER  
CHIEF JUSTICE

Miranda Lynch Thomas  
Children's Bureau, ACF  
US Dept. of Health & Human Services  
370 L'Enfant Promenade S.W.  
Washington, D.C. 20447

May 19, 2011

Re: Comments on the Child and Family Services Review process

Dear Ms. Thomas:

After consulting with our CIP officer, Shari Young, I am submitting the following comments regarding the Child and Family Services Review (CFSR) process from the perspective of the court system in Vermont. While the CFSR has elevated attention to child welfare practice in Vermont, and has contributed to improvement, the process at times has seemed confusing and created difficulties providing meaningful response. Some examples include:

- When the measures change (as they did from the first to second round), it decreases their usefulness as goals to measure progress over time.
- While employing composite measures (the second round of CFSR) is understandable, the measures are therefore more complex rendering them less useful for providing a simple snapshot of how the state is doing.
- In smaller states, such as Vermont, one case in the random case pool can have a disproportionate impact. In some cases, one error in a case would render the state out of compliance for the item.
- Are the monetary sanctions, which can be quite significant, the best vehicle for motivating the states if the goal is accountability and improved outcomes for children and families?

Thank you for the opportunity to comment.

Yours truly,



Paul L. Reiber

cc: Kay Farley  
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