



**STATE OF WEST VIRGINIA
DEPARTMENT OF HEALTH AND HUMAN RESOURCES**

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The following is representative of the opinions of staff convened to research and analyze the Child and Family Services Review and Program Improvement Plan redesign and sanctioned by West Virginia's Bureau for Children and Family leadership.

West Virginia recognizes the merits of the current CFSR system and the Program Improvement Process (PIP); however, we are in agreement that the process needs to evolve. WV agrees with the American Public Human Services Association, the National Association of Public Child Welfare and Casey Family programs that states would benefit from the development of a more effective and efficient way to seek accountability in reform and in child welfare practices.

West Virginia believes that ACF could best promote and measure quality improvement in child welfare by utilizing a State driven continuous improvement system as opposed to a quality assurance system. States need to be given ample time to allow best practices to be implemented, adjusted, and reviewed for impact. Systematic changes do not occur over short periods of time and may not be reflected in the current PIP process. We believe that areas needing improvement cannot be addressed all at one time. Resources should be provided to assist in the implementation of strategies for change that is more specific to the needs of the state rather than technical assistance developed in isolation of the state and delivered as part of a "canned" product. These resources should include consultation from Children's Bureau Regional Office (CBRO), peer consultation and financial assistance to implement large scale systemic change strategies.

West Virginia is in agreement with APHSA and NAPCWA that the federal over site needs to be completed in manner that allows for openness. The current system of using punitive measures as a means to assure compliance does not support the concept of openness. WV does not believe if a system is already struggling, resources should be taken away, rather we feel that progress towards goals or indicators should be rewarded with incentives.

The relationship with the State and the Federal over site team needs to be strengthened and individualized to meet the needs of the State. Dialogue to improve practice needs to focus on improving services to children and families. Direction should be given in a clear and uniformed manner applied across regions and states; furthermore, WV believes that the process must be more flexible. WV is in agreement that the scope of the state's child welfare should be examined based on what the state's child welfare system has the authority to change. States should be measured based on their baseline and have input into the development of targeted improvement goals. WV believes consultation from the Children's Bureau should be given in a positive and informative manner.

West Virginia believes stakeholder's opinions should be given consideration in the development of strategies for improvements; however, stakeholder involvement should be weighed against what is feasible for the State to accomplish, and the availability of resources. It should be noted that WV spent considerable effort to involve stakeholders in the development of the State's current program improvement plan (PIP) through participation in work groups. Many of the strategies developed by the work group were not approved by the CBRO for inclusion in West Virginia's final PIP; therefore, negating the value of their input.

West Virginia is strongly committed to the principle that variations exist among states, and the scope of the state's child welfare accountability system should accommodate such differences. We believe that recognition of separate populations within the states' practice models need to be taken into account. WV believes that the current CFSR style reviews do not fit with our youth services population. We believe our CFSR ratings reflect this. Separate instruments need to be developed to review this population.

West Virginia believes that folding the Child Family Services Review and PIP progress into Child and Family Services Plan and Annual Progress and Services Report would be beneficial to the State. We believe it would allow for more efficient use of resources. Time would be saved as redundancies between reports, reviews, planning and monitoring would be eliminated. WV believes data from the national child welfare databases should continue to play a factor in the federal monitoring practice; however, we don't believe it should be the sole means for measuring WV's outcomes. Qualitative data obtained through a case review must continue to play a role in measuring outcomes. WV believes additional measures should be added, for example outcomes should be added to address the "reasons for moves", and the rationale for the moves. States would need development funds should changes to the outcome measurement data occur. Any changes to the current data collection system should be phased in gradually. Federal technical support would be beneficial.

West Virginia's advanced quality review system should be used in place of the federal on-site review. WV believes the use of its' internal quality review system should be used for monitoring and establishing targeted improvement goals. West Virginia believes that utilizing its internal system allows for continuous case/practice reviews, which are crucial to improving outcomes. WV's internal quality assurance system can provide more accurate case review data. WV current case management/case record data collection system is complicated and requires extensive knowledge of the system to locate all pertinent information to complete a case review. This knowledge would not be available to external reviewers without voluminous training. WV does not believe the sample of 65 cases during the on-site portion of the CFSR is a true reflection of case practice. WV also notes that a larger and more representative case sample size could be drawn by its' own quality review system; therefore, painting a more accurate picture of State's practices. WV quality assurance unit also suggests the CFSR review instrument be revised, and consideration be given to separating ratings regarding needs and services to foster parents, biological mothers, biological father, the targeted child and siblings. Separation of the items would allow for better utilization of data.

WV does note that the financial burden of continuous quality reviews should be taken into consideration in this redesign process, as the burden would shift from the Federal government to the State. All States should be allowed to claim IV E reimbursement for the time allotted to

process, review analyze, as well as any other indirect activities associated with out of home cases.

In sum, a more streamlined process, with a tie to already existing processes and simplified measures is our recommendation. In addition, eliminate the on-site review and replace it with the ongoing quality assurance process and regular reporting cycles which would entail information that satisfies both the APSR and the CFSR. An additional suggestion is to redesign the funding structure to allow states to maximize Title IV-E whenever possible to defray the costs associated with expanded QA responsibilities.