

December 28, 2001

Ms. Pheon E. Beal, Director
Division of Social Services
Department of Health and Human Services
325 North Salisbury Street
Raleigh, North Carolina 27603

Dear Ms. Beal:

This letter relates to the Child Welfare Program Improvement Plan (PIP), which was mandated as a result of the findings from the Child and Family Services Review (CFSR) conducted in North Carolina earlier this year. The initial version was submitted in a timely manner on August 15, 2001. After negotiations with my staff relating to evaluation standards, the plan was resubmitted on October 17, 2001. Further technical changes were made in the Evaluation Structure for Program Improvement and a final version was submitted electronically to this office on December 10, 2001.

We appreciate the diligence of your staff in working through the intricacies of this process. We have reviewed the plan, as amended, and hereby approve it. In accordance with 45 CFR 1355.36 (b)(1), any penalty resulting from non-conformity to the law and regulations will be held in abeyance until you have had the opportunity to implement the plan.

Section 45 CFR 1355.35 (d)(4) requires that quarterly status reports be submitted on the progress in implementing the program improvement measures. As put forth in the Evaluation Section, we have agreed the first calendar quarter of 2002 will constitute the first quarter requiring a progress report and that the reports will be submitted within 30 days from the end of each quarter.

We believe you have developed a comprehensive and challenging list of corrective actions, which should have a positive impact on child welfare service delivery. Implementing the respective strategies and tracking progress and timeframes for completion will require concerted efforts by your Child Welfare staff. We look forward to working with you over the next two years in achieving program improvement, and if we can be of any assistance to you, either in-house or through one or more of our National Resource Centers, please do not hesitate to let us know.

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Enclosed is a copy of the approved plan. If you have any questions regarding this or other related matters, please call Fred Ritchie at 404-562-2902.

Sincerely,

Carlis V. Williams
Southeast Regional Hub Director

Enclosure

CC: State Child Welfare Director
Director, Office of Regional Operations
Commissioner, Administration on Children, Youth and Families
Children's Bureau Associate Commissioner
Director, Office of Public Affairs
Deputy Assistant Secretary for Policy and External Affairs

**North Carolina
PROGRAM IMPROVEMENT PLAN**

Outcome S1: CHILDREN ARE, FIRST AND FOREMEOST, PROTECTED FROM ABUSE AND NEGLECT

Outcome S2:..CHILDREN ARE SAFELY MAINTAINED IN THEIR HOMES WHENEVER POSSIBLE AND APPROPRIATE

STRATEGIES AND STEPS	IMPACTS ITEMS# AND NATIONAL STDS#	TIME FRAMES FOR COMPLETION	INTENDED EFFECTS
Develop or Clarify State Policies			
<ul style="list-style-type: none"> Clarify what constitutes a new report, when it should be accepted for investigative assessment, and when information constitutes “additional information”. 	Impacts Items # 1,2,3,4,5,7 National Standards-See Attached Sheet	12/01/01 Policy and Initiatives Team	<ul style="list-style-type: none"> Will help to assure that all agencies have clear information and consistent practice so that all maltreatment instances are addressed in all new and open cases and that an accurate picture of repeat maltreatment is captured.
<ul style="list-style-type: none"> Design a structured decision-making model for safety assessments. 	Impacts Items # 1,2,3,4,5,7 National Standards-See Attached Sheet	02/01/02 Policy and Initiatives Team	<ul style="list-style-type: none"> Provide structure to reduce instances of repeated maltreatment and greater consistency in screening reports of abuse and neglect.
<ul style="list-style-type: none"> Revise Intake form focusing on risk indicators and critical information needed to make appropriate decision to screen in or out. 	Impacts Items # 1,2,3,4,5,7, National Standards-See Attached Sheet	4/01/02 Policy and Initiatives Team	<ul style="list-style-type: none"> Reduce instances of repeated maltreatment and more accurately screen reports of abuse and neglect by providing structure to obtain critical information in family situation.

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<ul style="list-style-type: none"> Revise Children's Services Standards related to CPS Intake (i.e. initial and subsequent reports and additional information). 	Impacts All Outcomes and Items	11/01/01 Policy and Initiatives Team	<ul style="list-style-type: none"> To reduce instances of repeated maltreatment and to maintain children safely in their own homes. Ensure timely family needs assessments as well as the timely provision of services.
Redesign Program Review to Mirror Federal Review Instrument and Similar Process			
<ul style="list-style-type: none"> Revise Program review instrument to mirror Federal review instrument 	Impacts All Outcomes and Items	08/15/01 Program Review Team	<ul style="list-style-type: none"> To measure substantial conformity with federal case review outcomes
<ul style="list-style-type: none"> Begin using new instrument this year 	Impacts All Outcomes and Items	09/01/01 Program Review Team	<ul style="list-style-type: none"> To work in partnership with county DSS agencies to evaluate practice and outcomes.
Analyze and Redesign In-Home Services			
<ul style="list-style-type: none"> Develop standards for In-Home Services to assure greater family involvement, contacts, and attention to well-being outcomes. Begin implementation of new standards. 	Impacts All Outcomes and Items	03/01/02 Local Operations Team	<ul style="list-style-type: none"> Provide greater guidance to county staff to reduce instances of repeated maltreatment and to maintain children safely in their own homes. Ensure more consistent practice in providing in-home services.

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<ul style="list-style-type: none"> Implement Team decision-making model that ensures family participation. 	Impacts All Outcomes and Items	3/01/02 Policy and Initiatives Team; Local Operations Team	<ul style="list-style-type: none"> Implement a more family centered and team-oriented approach; “nothing about me without me” concept incorporated across program lines.
<ul style="list-style-type: none"> Develop and implement a model of practice for the consistent provision of In-Home Services. 	Impacts All Outcomes and Items	Begin implementation 03/01/02 Local Operations Team, Staff Development Team	<ul style="list-style-type: none"> Reduce instances of maltreatment and to maintain children safely in their own homes; better consistency of practice. Ensure that families are contacted in a timely manner, needs are accurately assessed and services provided immediately.
<ul style="list-style-type: none"> Build capacity of Family Resource Centers funded by the Division to provide in-home services to families in contact with the child welfare system. 	2,3,4,5,7,17,18,20,23	7/01/02 Resource Development Team, Staff Development Team	<ul style="list-style-type: none"> To incorporate the philosophy underlying <u>prevention</u> services across program lines, reducing instances of maltreatment and helping children remain safely in their own homes.
Redesign Risk Assessment/Safety Assessment/Family Assessment			
<ul style="list-style-type: none"> Develop assessment structure that addresses critical family issues such as child well being measures, educational needs, domestic violence, substance abuse, and other safety and risk factors. 	Impacts All Outcomes and Items	3/01/02 Policy and Initiatives Team	<ul style="list-style-type: none"> To ensure that all areas impacting child safety and well being are examined in depth so that services are focused on family needs and family strengths.

Self Assessment by All Counties and Monitored by Division			
<ul style="list-style-type: none"> Develop a mechanism to ensure that counties are implementing the state's program improvement plan 	Impacts All Outcomes and Items	1/01/02 Local Operations Team; Policy and Initiatives Team	<ul style="list-style-type: none"> To ensure that counties are implementing the requirements in the Program Improvement Plan.
Re-Map AFCARS and NCANDS to Build In-House Capacity to Measure State to National Standards			
<ul style="list-style-type: none"> Have discussions with the National Resource Center for Information and Technology. 	Impacts All Outcomes and Items	11/15/01 Section Chief; Adoption Resource and Exchange Team; Policy and Initiatives Team	<ul style="list-style-type: none"> To ensure Division's submission of accurate AFCARS and NCANDS data.
Implement the System of Care (SOC) Concept in Child Welfare			
<ul style="list-style-type: none"> Continue to build SOC in partnership with Division of Mental Health, Department of Juvenile Justice and Department of Public Instruction 	Impacts All Outcomes and Items	Ongoing Policy and Initiatives and colleagues from Department of Mental Health, Department of Juvenile Justice, Department of Public Instruction	<ul style="list-style-type: none"> To help prevent repeat maltreatment; To ensure individualized services are identified and delivered in a timely way; and To ensure that family input is obtained.
Improve Supervisory Oversight at County Level of Practice			
<ul style="list-style-type: none"> Develop plan to strengthen supervisory role in county DSS's to improve consistency of practice. 	Impacts All Outcomes and Items	3/01/02 Staff Dev. Team	<ul style="list-style-type: none"> To prevent repeated maltreatment and to help children remain safely in their own homes.

Outcome P1: CHILDREN HAVE PERMANENCY AND STABILITY IN THEIR LIVING SITUATIONS.
 Outcome P2: THE CONTINUITY OF FAMILY RELATIONSHIPS AND CONNECTIONS IS PRESERVED FOR CHILDREN

STRATEGIES AND STEPS	IMPACTS ITEMS# AND NATIONAL STDS#	TIME FRAMES FOR COMPLETION	INTENDED EFFECTS
Develop or Clarify State Policies			
<ul style="list-style-type: none"> LINKS Independent Living Policy Write policy Specify desired outcomes Track county performance on achievement of outcomes 	6, 7, 8, 10, 14, 15, 16	1/01/02 Policy and Initiatives Team	<ul style="list-style-type: none"> Assure that all teens in care have an objective assessment upon which to base transitional planning. Improved consistency of services to teens in foster care Increased involvement of teens in their own planning and implementation of plans Improved conceptual framework for teens and providers by tying desired outcomes with program components Regular monitoring of county performance to assure consistency of practice and to provide needed technical assistance Improve stability of placements for teens in foster care

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<ul style="list-style-type: none"> Form work group from county DSS's and/or private providers to evaluate and define effective post adoption services and to recommend changes in policy and standard. 	5, 9	4/01/02 Policy and Initiatives Team; Resource Development Team; Adoption Resource and Exchange Team	Counties will provide consistent post adoption services to families which will reduce disruptions.
<ul style="list-style-type: none"> Clarify standard and practice regarding visitation (e.g. not denying visitation as a punishment) and Life Books for children in foster care. 	13, 14, 16	11/01/01 Policy and Initiatives Team	Strengthen visitation between children and families/significant others to build their personal support networks Develop appropriate means of discipline
Review and Revise Licensing Standard			
<ul style="list-style-type: none"> Increase flexibility of licensing standards without compromising safety of children and youth 	6, 10, 11, 12, 15	07/01/02 Policy and Initiatives Team; Interstate Services Team	Reduce inappropriate administrative barriers to permanence Increase number and variety of placement options for children and teens in foster care, including developmentally disabled children. Increase licensing of relatives as foster families

<p>Planning for Permanence</p> <ul style="list-style-type: none"> • Aggressively address systemic disincentives to adoption, such as loss of benefits upon adoption. • Encourage adult adoptions for older teens who are aging out of the system without achieving permanence • Apply for continuation of IV-E Waiver; encourage statewide use of assisted guardianship as a permanency option. 	<p>9, 10, 11, 15</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>7/01/02 Policy and Initiatives Team; Staff Development Team Adoption Resource and Exchange Team Resource Development Team; Program Review Team</p>	<ul style="list-style-type: none"> • Increase achievement of permanence for children and youth who have been in foster care. • Increase licensing of relatives as foster families • Develop realistic options to long term foster care. • Develop more placement options for acting out and delinquent youth
<p>Redesign Program Review to Mirror Federal Review Instrument and Similar Process</p>			
<ul style="list-style-type: none"> • See safety section 			
<p>Self Assessment by All Counties and Monitored By Division</p>			
<ul style="list-style-type: none"> • See safety section 			
<p>Re-Map AFCARS and NCANDS</p>			
<ul style="list-style-type: none"> • See safety section 			

Implement the System of Care (SOC) Concept in Child Welfare			
<ul style="list-style-type: none"> Continue to build SOC in partnership with Division of Mental Health, Department of Juvenile Justice and Department of Public Instruction. 	3, 4, 6, 7, 9, 10, 11, 12, 17, 18, 19, 20, 23	Ongoing Policy and Initiatives and colleagues from Department of Mental Health, Department of Juvenile Justice, Department of Public Instruction	Wraparound services for children and youth who are at the highest risk of placement due to mental health issues and/or delinquent behaviors. Keep children out of DSS custody and reduce the number of children entering out-of-home placements Promote placement and permanency for children with behavioral mental health needs in family settings in the community
Improve Supervisory Oversight at County Level of Practice			
<ul style="list-style-type: none"> See safety section 	All Outcomes and Items	3/01/02	<ul style="list-style-type: none"> To ensure consistency of practice across the state.
Develop Foster Care Recruitment Strategies for Underserved Children and Families			
<ul style="list-style-type: none"> Expand efforts to recruit and retain foster and adoptive families in communities from which children are removed. 	5,6,8,10, 11,12	11/01 Ongoing Policy and Initiatives Team; Adoption Resource and Exchange Team	<ul style="list-style-type: none"> Improve retention of qualified, effective foster parents Increase reunification rate by emphasizing co-parenting role of foster parents Reduce disruptions in foster care Reduce maltreatment of children in foster care

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<ul style="list-style-type: none">• Develop critical public and private partnerships with the Governor's office, cultural representatives/ organizations, universities, the Casey Foundation, and others who can help DSS to be effective in serving ethnic minority populations.	3, 6, 10, 11, 12, 14, 15	On-going Policy and Initiatives Team Adoption Resource and Exchange Team; Resource Development Team	<ul style="list-style-type: none">• Develop a broad based, collaborative plan to serve ethnic minorities through the delivery of culturally responsive services
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Outcome WB1: FAMILIES HAVE ENHANCED CAPACITY TO PROVIDE FOR THEIR CHILDREN'S NEEDS
 Outcome WB2: CHILDREN RECEIVE APPROPRIATE SERVICES TO MEET THEIR EDUCATIONAL NEEDS
 Outcome WB3: CHILDREN RECEIVE ADEQUATE SERVICES TO MEET THEIR PHYSICAL AND MENTAL HEALTH NEEDS

STRATEGIES AND STEPS	IMPACTS ITEMS # AND NATIONAL STDS #	TIME FRAMES FOR COMPLETION	INTENDED EFFECTS
Redesign Program Review to Mirror Federal Review Instrument and Similar Process			
See safety section			
Develop or Clarify State Policies			
<ul style="list-style-type: none"> Redesign In-Home Services Clarify policy regarding children's involvement in case planning Redesign case plan tools and process Work with secretary of DHHS to form critical partnerships between domestic violence organizations and DSS. 	18,21,23	<ul style="list-style-type: none"> 3/1/02 11/1/02 6/30/02 11/30/01 <p>Local Operations, Staff Dev., Resource Dev., and Policy Teams</p>	<ul style="list-style-type: none"> Will broaden approach to broad, family centered practice as opposed to child centered, incident specific intervention Will provide a more consistent service delivery across state Children will be involved in their case planning as appropriate Promote active family involvement in their case planning process
Redesign Risk Assessment/Safety Assessment/Family Assessment			
<ul style="list-style-type: none"> See safety 			
Re-Map AFCARS and NCANDS to Build In-House Capacity to Measure State to National Standards			
See safety			
Implement the System of Care (SOC) Concept in Child Welfare			
<ul style="list-style-type: none"> See safety section 			

March 3, 2004

Ms. Pheon E. Beal, Director
Division of Social Services
Department of Health and Human Services
325 North Salisbury Street, MSC 2406
Raleigh, North Carolina 27699-2406

Dear Ms. Beal:

This is in response to your letter of November 24, 2003, in which you requested a renegotiation of certain benchmarks previously agreed to in conjunction with the Child and Family Services Review Program Improvement Plan (PIP). Specifically, you asked for a renegotiation of the baselines and goals for the national standard for repeat maltreatment and maltreatment in foster care.

Your rationale for recalibrating these benchmarks was that during the course of the Child and Family Services Review, it was discovered there was an under-reporting problem with these two items and although you subsequently took appropriate action to correct the reporting problem, the original benchmarks were based on flawed 1999 data. You further stated that in your opinion, calendar year 2002 data reflects the most accurate account for repeat maltreatment and maltreatment in foster care.

After careful consideration of the issues, we have come to agree with your assessment. As such, we propose to re-designate 2002 as the base year upon which new benchmarks are drawn for the two safety data indicators, and to use 2003 as the comparison year by which improvement will be measured. If CY 2002 data is used as the base year, North Carolina will have had only one year to demonstrate improvement and therefore, we propose that half the rate of sampling error should be used as the minimum percentage of improvement for the safety data indicators. The charts below show the original baselines and goals as well as the new proposed baselines and goals using half the sampling error.

Abuse/Neglect in Foster Care	
National Standard	.57%
Sampling Error	.1439%
Original baseline per CY99 data profile	.83%
Original goal of improvement (sampling error)	.69%
Proposed baseline based on CY 02 data profile	.95%
Proposed goal of improvement using half of sampling error of .072%	.878%
Time period covered	Jul 03 – Mar 04

Repeat Maltreatment	
National Standard	6.1%
Sampling Error	.9%
Original baseline per CY99 data profile	8.0%
Original goal of improvement (sampling error)	7.1%
Proposed baseline based on FY 02 data profile	9.0%
Proposed goal of improvement using half of sampling error, .45%	8.55%
Time period covered	Apr 03 to Mar 04

Evaluation of North Carolina’s PIP:

According to the FY 2002 CB data profile, the State has met the goals for two of the five national standard indicators that it had to address in the PIP (two safety and three permanency indicators). The remaining three indicators, abuse/neglect in foster care, repeat maltreatment and stability of placements will be evaluated at the end of the PIP period. We propose using the data profiles outlined below to evaluate the State’s progress on these three data indicators.

Data indicator	Data profile that will be used to evaluate progress	Status of data profiles
Abuse/Neglect in Foster Care	In order to be consistent with the timeframe used before NCANDS submission schedule was converted to the FY cycle, a 9 month file (Jul 03 to Mar 04) will be used to calculate this indicator. For NC, this 9-month file will be constructed from: <ul style="list-style-type: none"> • AFCARS FY03 (b) & FY04 (a) files • Data produced by the State for 9 months (July 1, 03 through March 31, 04), using the syntax and Validator provided by CB. The syntax will generate a safety profile that includes both safety indicators. 	CB has FY03 (a & b) AFCARS submission but will need to wait for AFCARS FY04 (a) file.** State will have to compile and submit data for July 1, 03 to March 31, 04. The file will be created, with the assistance of WRMA if needed.
Recurrence of Maltreatment	Annual file (April 03 to March 04) that the State will generate using the syntax and Validator provided by CB.	State will have to compile and submit data for April 1, 03 to March 31, 04. The file will be created, with the assistance of WRMA if needed.
Stability of placements	Annual file (April 03 to March 04) composed of two 6-months files, FY03 (b) file and FY04 (a) file. Use rolling year syntax.	CB has FY03 (a & b) AFCARS submission. Will need to wait for AFCARS FY04 (a) file submission.*

* States have until May 15, 2004 to submit the AFCARS FY04(a) file.

These issues were discussed with your staff in a conference call three weeks ago, and general agreement was reached on the terms and conditions of the renegotiated benchmarks. This letter puts those terms and conditions in writing for your consideration. If you accept the proposed new benchmarks for repeat maltreatment and maltreatment in foster care, and the methodology for evaluating attainment of those benchmarks, please respond in writing. Upon receipt of an acceptance letter, this document will be made an addendum to the approved PIP.

We have noted the considerable progress North Carolina has made since the time of the Child and Family Services Review and we look forward to a continued partnership in working on expanding that progress. If we can be of further assistance, or if you have any questions regarding these issues, please call Fred Ritchie at 404-562-2902.

Sincerely,

Carlis V. Williams
Regional Administrator
Administration for Children and Families