

EXECUTIVE SUMMARY
Final Report: Tennessee Child and Family Services Review
April 2009

INTRODUCTION

This document presents a summary of the findings of the Child and Family Services Review (CFSR) for the State of Tennessee. The CFSR is the Federal Government's program for assessing the performance of State child welfare agencies with regard to achieving positive outcomes for children and families. The CFSR is authorized by the Social Security Amendments of 1994 requiring that the U.S. Department of Health and Human Services (HHS) promulgate regulations for reviews of State child and family services programs under titles IV-B and IV-E of the Social Security Act. The CFSR is implemented by the Children's Bureau (CB) of the Administration for Children and Families within HHS.

The Tennessee CFSR was conducted the week of August 25, 2008. The period under review was from April 1, 2007, to August 29, 2008. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the Tennessee Department of Children's Services (DCS)
- The State Data Profile, prepared by CB, which provides State child welfare data for fiscal year (FY) 2004, FY 2005, and the 12-month CFSR period ending March 31, 2007
- Reviews of 65 cases at three sites across the State (31 cases in the Shelby County office, 17 cases in the Bradley County office, and 17 cases in the Putnam County office)
- Interviews or focus groups (conducted at all three sites and at the State level) with stakeholders including, but not limited to, children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys

Information from each resource is presented for all of the items reviewed.

Background Information

The CFSR assesses State performance with regard to its substantial conformity with seven child and family outcomes and seven systemic factors. For the outcome assessments, each outcome incorporates one or more of the 23 items included in the review, and each item is rated as a Strength or an Area Needing Improvement (ANI) based on the results of the case reviews. An item is given an overall rating of Strength if at least 90 percent of the applicable cases reviewed are rated as a Strength. Depending on item ratings, an outcome can be "substantially achieved," "partially achieved," or "not achieved." For a State to be in substantial conformity with a particular outcome, 95 percent of the cases reviewed must be rated as having substantially achieved the outcome. Two outcomes—

Safety Outcome 1 and Permanency Outcome 1—also are evaluated based on State performance with regard to six national data indicators. For a State to be in substantial conformity with these outcomes, both the national standards for each data indicator and the case review requirements must be met.

There are 22 items that are considered in assessing the State’s substantial conformity with the seven systemic factors. Each item reflects a key Federal program requirement relevant to the Child and Family Services Plan (CFSP) for that systemic factor. An item is rated as a Strength or an ANI based on whether State performance on the item meets the Federal program requirements. A determination of the rating is based on information provided in the Statewide Assessment and from interviews with stakeholders held during the onsite CFSR. Additional information may come from other Federal reports or assessments.

Overall performance on each systemic factor is based on the ratings for the individual items incorporated in the systemic factor. For any given systemic factor, a State is rated as being either in substantial conformity with that factor (i.e., a score of 3 or 4) or not in substantial conformity with that factor (a score of 1 or 2). Specific requirements for each rating are shown in the table below.

Rating the Systemic Factor			
Not in Substantial Conformity		In Substantial Conformity	
1	2	3	4
None of the CFSP or program requirements is in place.	Some or all of the CFSP or program requirements are in place, but more than one of the requirements fail to function as described in each requirement.	All of the CFSP or program requirements are in place, and no more than one of the requirements fails to function as described in each requirement.	All of the CFSP or program requirements are in place and functioning as described in each requirement.

A State that is not in substantial conformity with a particular outcome or systemic factor must develop and implement a Program Improvement Plan (PIP) to address the areas of concern associated with that outcome or systemic factor.

Because many changes were made in the CFSR process based on lessons learned during the first round and in response to feedback from the child welfare field, a State’s performance in the second round of the CFSR is not directly comparable to its performance in the first round. Key changes in the process that make it difficult to compare performances across reviews are the following:

- An increase in the sample size from 50 to 65 cases
- Stratification of the sample to ensure a minimum number of cases in key program areas, resulting in variations in the number of cases relevant for specific outcomes and items
- Changes in criteria for specific items to increase consistency and to ensure an assessment of critical areas such as child welfare agency efforts to involve noncustodial parents

Key CFSR Findings Regarding Outcomes

Tennessee did not achieve substantial conformity with any of the seven CFSR outcomes. The State did achieve overall ratings of Strength for the following individual indicators:

- Proximity of placement (item 11)
- Placement of siblings (item 12)
- Physical health of child (item 22)

Additionally, Tennessee met the national data standard for Permanency Composite 2 (Timeliness of adoptions) and Permanency Composite 3 (Permanency for children in care for extended time periods).

The CFSR identified the following key concerns with regard to the State's performance in achieving the desired outcomes for children and families:

- The State did not meet the national standards for the data indicators pertaining to absence of maltreatment recurrence and absence of maltreatment in foster care.
- The State did not meet the national data standard for Composite 1 (Timeliness and permanency of reunification) or for Composite 4 (Placement stability).
- The State was not in substantial conformity with any of the seven outcomes:
 - Well-Being Outcome 2 (Children receive services to meet their educational needs) was substantially achieved in 83.3 percent of the cases reviewed.
 - Well-Being Outcome 3 (Children receive services to meet their physical and mental health needs) was substantially achieved in 66.1 percent of the cases reviewed.
 - Permanency Outcome 2 (Continuity of family relationships and connections is preserved) was substantially achieved in 57.5 percent of the cases reviewed.
 - Safety Outcome 1 (Children are, first and foremost, protected from abuse and neglect) was substantially achieved in 53.3 percent of the cases reviewed.
 - Safety Outcome 2 (Children are safely maintained in their homes when possible and appropriate) was substantially achieved in only 50.8 percent of the cases reviewed.
 - Well-Being Outcome 1 (Families have enhanced capacity to provide children's needs) was substantially achieved in only 35.4 percent of the cases reviewed.
 - Permanency Outcome 1 (Children have permanency and stability in their living situations) was substantially achieved in only 27.5 percent of the cases reviewed.

The State's low performance with regard to these CFSR outcomes and national data standards may be attributed in part to the following key factors:

- Caseworkers fail to recognize risk and safety factors of children at home or in foster care.
- Reunification often occurs prematurely and without the appropriate aftercare support, which often results in reentry into foster care.
- In certain areas of the State, the court and other community partners do not support placement of children with parents and extended family, which may affect the achievement of permanency.
- Safety and permanency for children are not connected. There is a need for more emphasis on safety.
- DCS does not follow the principles of family-centered practice. Casework is incident driven and child focused as opposed to being holistic.
- Assessments are not fully integrated into the Child and Family Team Meeting (CFTM) process.

Key CFSR Findings Regarding Systemic Factors

Tennessee is in substantial conformity with five of the seven systemic factors:

- Statewide Information System
- Quality Assurance
- Staff and Provider Training
- Agency Responsiveness to the Community
- Foster and Adoptive Parent Licensing, Recruitment, and Retention

Tennessee is not in substantial conformity with the systemic factors of Case Review System and Service Array and Resource Development.

The specific findings regarding the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance with regard to the seven systemic factors assessed through the CFSR. In the following section, key findings are summarized for each outcome and systemic factor. Information also is provided about the State's performance on each outcome and systemic factor during the Federal FY 2002 CFSR.

I. KEY FINDINGS RELATED TO OUTCOMES

Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect

Safety Outcome 1 incorporates two items. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1), and the other relates to the recurrence of substantiated or indicated maltreatment (item 2). Safety Outcome 1 also incorporates two national data indicators for which national standards have been established. These data indicators measure the absence of maltreatment recurrence and the absence of maltreatment of children in foster care by foster parents or facility staff.

Tennessee is not in substantial conformity with Safety Outcome 1. The outcome was determined to be substantially achieved in 53.3 percent of the applicable cases, which is less than the 95 percent required for a rating of substantial conformity. Safety Outcome 1 was substantially achieved in 78 percent of applicable Putnam County cases, 50 percent of applicable Bradley County cases, and 36 percent of applicable Shelby County cases. In addition, Tennessee did not meet the national standard for the measure assessing the absence of maltreatment recurrence or the national standard for the measure assessing absence of maltreatment of children in foster care. Key findings from the 2008 CFSR were the following:

- The case reviews identified inconsistent practice in regard to initiating a response to child maltreatment reports and establishing face-to-face contact with children.
- Tennessee did not meet the national standard for the measure assessing the absence of maltreatment recurrence or the national standard for the measure assessing absence of maltreatment of children in foster care.

The State was not in substantial conformity with this outcome in its first CFSR, conducted in 2002. The key concern identified in the 2002 CFSR was that investigations of maltreatment allegations were not initiated in accordance with the timeframes established by State policy. To address this concern, the State implemented the following strategies in its PIP:

- Established a statewide Central Intake Unit
- Reviewed and revised policies and definitions related to response times to maltreatment allegations and trained staff on revisions
- Implemented the Special Investigations Team as a means to build expertise and contribute to improved response times
- Conducted a workload analysis to determine the appropriate number of investigative staff needed in each region and then made changes in child protective services (CPS) staff based on the recommendations resulting from this analysis
- Developed and implemented competency-based in-service training for CPS supervisors
- Enhanced the partnership between DCS, Child Advocacy Center, and Child Protective Investigative Teams

The State met its goals for this outcome by the end of the PIP implementation period.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate

Performance on Safety Outcome 2 is assessed through two items. One item (item 3) assesses State efforts to prevent children's removal from their homes by providing the family with services to ensure children's safety while they remain in their homes. The other item (item 4) assesses efforts to manage safety and reduce the risk of harm to children in their own homes and in their foster care placements.

Tennessee is not in substantial conformity with Safety Outcome 2. The outcome was determined to be substantially achieved in only 50.8 percent of the cases reviewed, which is less than the 95 percent or higher required for a rating of substantial conformity. The outcome was substantially achieved in 71 percent of applicable Putnam County cases, 65 percent of applicable Bradley County cases, and 32 percent of applicable Shelby County cases. Both items incorporated into this item were rated as ANIs. Findings from the 2008 Onsite Review indicate that DCS is inconsistent in providing services to prevent removal. Additionally, conducting thorough risk and safety assessments is inconsistent across the State and among caseworkers. Information from the review process indicates that there are numerous assessment tools required for each case. However, using the tools correctly and addressing the underlying issues is frequently a challenge for caseworkers.

The State was not in substantial conformity with this outcome in its 2002 CFSR. Both items incorporated into this outcome were rated as ANIs. The following concerns were identified in the 2002 CFSR:

- Services were not provided on a consistent basis sufficient to maintain children safely in their homes.
- Caseworkers were inconsistent in conducting comprehensive risk and needs assessments, monitoring families on an ongoing basis to ensure children's safety, and assessing changes in risk factors prior to reunification.

To address the identified concerns, the State implemented the following strategies in its PIP:

- The State implemented the Functional Assessment Initiative to address the frequency and quality of initial and ongoing child and family assessments.
- The State increased service availability by the use of the Brian A. Needs Assessment process and resulting allocation of funds.

The State met its goals for this outcome by the end of the PIP implementation period.

Permanency Outcome 1: Children have permanency and stability in their living situations

Six items are incorporated in the assessment of Permanency Outcome 1, although not all of them are relevant for all of the foster care cases reviewed. The items pertain to State efforts to prevent foster care reentry (item 5), ensure placement stability for children in foster care (item 6), and establish appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining items focus on an assessment of State efforts to achieve permanency goals (such as

reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9) or to ensure that children who have a case goal of other planned permanent living arrangement (OPPLA) are in stable long-term placements and are adequately prepared for eventual independent living (item 10).

Tennessee is not in substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in only 27.5 percent of the cases, which is less than the 95 percent required for a rating of substantial conformity.
- The State Data Profile indicates that for the CFSR 12-month target period for the data indicators, the State did not meet the national standards for Permanency Composite 1 (Timeliness and permanency of reunification) and Permanency Composite 4 (Placement stability).

However, the State did meet the national standard for Permanency Composite 2 (Timeliness of adoptions) and Permanency Composite 3 (Permanency for children in foster care for extended time periods).

The outcome was substantially achieved in 40 percent of Putnam County cases, 30 percent of Shelby County cases, and 10 percent of Bradley County cases.

All items rated for this outcome were rated as ANIs. There were no cases rated for item 10. Key findings for this outcome in the 2008 CFSR were the following:

- Preventing foster care reentries within a 12-month period is a challenge for the State (item 5).
- The Onsite Review indicates that there are issues in maintaining stable placements for foster children particularly related to (1) meeting their behavioral needs and (2) ensuring that their placements are safe and well-supported (item 6). In addition, the State did not meet the national standard for Permanency Composite 4: Placement stability for the 12-month CFSR period ending March 31, 2007.
- The 2008 CFSR indicates that Tennessee does not consistently establish timely and appropriate permanency goals for children in foster care and is not consistently meeting Adoption and Safe Families Act (ASFA) requirements and filing for termination of parental rights (TPR) in a timely manner (item 7). However, the State met the national standard for data Permanency Composite 3: Permanency for children and youth in foster care for long periods of time.
- Information from the Onsite Review indicates DCS did not make diligent efforts to reunify children with parents or relatives (item 8). Additionally, the State did not meet the national standard for data Permanency Composite 1: Timeliness and permanency of reunification.
- Information from the review indicates that the State is not consistently completing adoptions in a timely manner (item 9). However, the State met the national standards for Permanency Composite 2: Timeliness of adoptions.

Tennessee was not in substantial conformity with Permanency Outcome 1 in the 2002 CFSR. In the 2002 CFSR, all the items incorporated in the outcome were rated as ANIs. The following concerns were identified in the 2002 CFSR:

- Most of the children in the foster care cases reviewed did not have permanency and stability in their living situations.
- Agency practice was inconsistent with regard to establishing appropriate permanency goals and achieving adoptions in a timely manner.
- The goal of OPPLA was being established for children without a thorough exploration of other permanency options.

To address these concerns, Tennessee implemented the following strategies in its PIP:

- The State conducted a statewide assessment to determine resources needed in each region.
- The State utilized a backlog review process to review cases, facilitate staffing, and provide support services. The State developed and implemented regional plans for redesigning the DCS structure to improve permanency planning.
- The State increased the availability of services to children and their families by using the Brian A. Needs Assessment process and resulting allocation of funds.
- The State developed and implemented a statewide post-adoption service program to support families who adopt children from the child welfare system.

Tennessee met its goals for this outcome by the end of the PIP period.

Permanency Outcome 2: The continuity of family relationships and connections is preserved for children

Permanency Outcome 2 incorporates six items that assess State performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and between children and their siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Tennessee is not in substantial conformity with Permanency Outcome 2. The outcome was rated as substantially achieved in 57.5 percent of the cases, which is less than the 95 percent or higher required for substantial conformity. The outcome was determined to be substantially achieved in 70 percent of applicable Putnam County cases, 60 percent of applicable Shelby County cases, and 40 percent of applicable Bradley County cases.

Key findings for this outcome in the 2008 CFSR were the following:

- Children in the cases reviewed were in foster care placements that were in close proximity to parents or potential permanent caregivers unless specialized placements were necessary (item 11).

- The State is consistent in its efforts to place siblings together (item 12).
- Children’s visitation with mothers, fathers, and siblings was not of sufficient quality or quantity to meet the needs of the families. Visits were far more likely to occur with siblings and mothers than with fathers (item 13).
- Children’s connections with extended family, school, and community were not being consistently maintained (item 14).
- There were inconsistent efforts to search for maternal and paternal relatives as placement resources for children (item 15).
- The support of the parents’ relationship with their children while the children were in foster care was generally inconsistent. Less attention was given to promoting children’s bonds with fathers than mothers (item 16).

Tennessee was not in substantial conformity with this outcome in its 2002 CFSR. The following concerns were identified in the 2002 CFSR:

- DCS was not consistently effective in placing siblings together.
- There were inconsistencies in practice with regard to facilitating or promoting visitation with parents and siblings in foster care and preserving children’s connections.
- Relatives were not sought as potential placement resources.
- Agency practice was not consistent with regard to promoting or maintaining the relationship between children and their parents.

To address these concerns, Tennessee implemented the following strategies in its PIP:

- The State studied and developed recommendations to implement subsidized guardianship.
- Contracted therapeutic visitation services were made available.
- The State developed and implemented statewide policies to support children placed with kin.
- The State developed and provided information regarding available support services and provided this information to families served by DCS.
- The State implemented a statewide relative caregiver program.

Tennessee met its goals for this outcome by the end of the PIP period.

Well-Being Outcome 1: Families have enhanced capacity to provide for their children’s needs

Well-Being Outcome 1 incorporates four items. One item pertains to State efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second item examines State efforts to actively involve parents and children (when appropriate) in the case planning process (item 18). The two remaining items examine the frequency and quality of caseworker contacts with the children in their caseloads (item 19) and with the children’s parents (item 20).

Tennessee is not in substantial conformity with Well-Being Outcome 1. The outcome was substantially achieved in only 35.4 percent of the cases reviewed, which is less than the 95 percent required for a determination of substantial conformity. The outcome was substantially achieved in only 47 percent of Bradley County cases, 41 percent of Putnam County cases, and 26 percent of Shelby County cases. The outcome was found to be substantially achieved in 52.5 percent (21 cases) of the 40 foster care cases and 8 percent (2 cases) of the 25 in-home services cases. All items incorporated into this outcome were rated as ANIs.

Key findings for this outcome in the 2008 CFSR were the following:

- DCS was more consistent in assessing and addressing the needs of foster parents and children than it was in assessing and meeting the service needs of mothers and fathers. Additionally, CFS was more effective in assessing and addressing needs in foster care cases than it was in in-home services cases (item 17).
- DCS was not consistent in involving parents and children in the case planning process. Mothers and children were more likely to be involved in case planning than fathers (item 18).
- DCS was not consistently effective in ensuring both the frequency and quality of caseworker visits with children in in-home services cases (item 19).
- DCS was not consistently effective in ensuring both the frequency and quality of caseworker visits with parents, particularly visits with fathers (item 20).

Tennessee was not in substantial conformity with this outcome in its 2002 CFSR. Item 19, pertaining to caseworker visits with the child, was rated as a Strength. All other items included in this outcome were rated as ANIs. The following key concerns were identified in the 2002 CFSR:

- Inadequacy of assessments, particularly with respect to identifying underlying problems such as substance abuse and sexual abuse
- Inconsistency in meeting children's and parent's service needs
- Lack of independent living (IL) services for children
- Lack of attention in some cases to the service needs of foster parents
- Lack of engagement/involvement with the family, particularly fathers, in case planning
- Lack of sufficient frequency and quality of caseworker visits with parents

To address these concerns, the State implemented the following strategies in its PIP:

- The State provided skills-based training statewide to teach family-centered casework and planning and also implemented regional plans for CFTMs.
- The State developed and implemented a quality visitation process to facilitate attachment between parents and children and support placements.

The State met its target goals for this outcome by the end of the PIP implementation period.

Well-Being Outcome 2: Children receive appropriate services to meet their educational needs

Only one item is assessed under Well-Being Outcome 2. It pertains to State efforts to address and meet the educational needs of children in foster care and, when relevant, children in in-home services cases (item 21).

Tennessee is not in substantial conformity with Well-Being Outcome 2. The outcome was substantially achieved in 83.3 percent of the 48 applicable cases. This is less than the 95 percent required for substantial conformity. The outcome was determined to be substantially achieved in 90 percent of applicable Putnam County cases, 83 percent of applicable Shelby County cases, and 80 percent of applicable Bradley County cases.

In the 2008 CFSR, a key issue indicated by stakeholders at the three review sites and the State level is that although DCS makes a diligent effort to maintain children in the same school district, when children have to change districts, there are often problems with credits transferring due to different scheduling systems. Some stakeholders reported delays in grade promotion and graduation due to credit loss during district transfers.

Tennessee was not in substantial conformity with Well-Being Outcome 2 in its 2002 CFSR. The following key concerns were identified in the 2002 CFSR:

- A lack of advocacy for the child around education-related issues
- A lack of educational alternatives for children who have been expelled or suspended from school
- Inadequate educational services in residential placement settings

To address these concerns, the State implemented the following strategies in its PIP:

- Continued implementation of the Education Plan, which includes a plan for schools in residential settings
- Monitored staff performance to ensure that both DCS staff and contract staff meet the educational standards outlined for custodial and noncustodial children

The State met its target goals for this outcome by the end of the PIP implementation period.

Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs

This outcome incorporates two items that assess State efforts to meet the physical health (item 22) and mental health (item 23) needs of children in foster care and children in in-home services cases, if relevant.

Tennessee is not in substantial conformity with Well-Being Outcome 3. The outcome was determined to be substantially achieved in 66.1 percent of the 56 applicable cases, which is less than the 95 percent required for substantial conformity. The outcome was

substantially achieved in 71 percent of applicable Bradley County cases and 64 percent of applicable Putnam County and Shelby County cases. The outcome was substantially achieved in 87.5 percent (35 cases) of the 40 foster care cases and 12.5 percent (2 cases) of the 16 applicable in-home services cases.

The key findings for this outcome in the 2008 CFSR indicate that although DCS is generally effective in meeting children's physical needs, it is less consistent in meeting their mental health needs. Additionally, DCS is more consistent in assessing and meeting the medical and mental health needs of children in foster care than children receiving in-home services.

The State was not in substantial conformity with this outcome for the 2002 CFSR. The following concerns were identified in the 2002 CFSR:

- Some children who appeared to need mental health assessments had not received them, and some children who had mental health assessments had not received all of the services recommended by the assessment.
- In some cases, recommended services were documented, but there was no follow-up to determine whether services had been provided.

To address these concerns, the State implemented the following PIP strategies:

- The State ensured that every child coming into care received a medical examination within 30 days and, if appropriate, a psychological evaluation within 30 days.
- The State developed practices to ensure that if evaluations or examinations resulted in a need for services, there was follow-up to determine if the services were provided.
- The State developed and actively implemented a plan for ensuring compliance with the policies regarding the use of psychotropic medications, restraints, and seclusion.

The State met the target goals for this outcome by the end of the PIP implementation period.

II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

Statewide Information System

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating an information system that can provide accurate and timely information pertaining to the status, demographic characteristics, location, and case goals for the placement of every child in foster care.

Tennessee is in substantial conformity with the systemic factor of Statewide Information System in the 2008 CFSR. The State's data system, TN Kids, and the legacy systems in the State can identify the status, demographic characteristics, location, and goals for the placement of each child in foster care.

Tennessee was in substantial conformity with this factor in the 2002 CFSR and was not required to address the factor in its PIP.

Case Review System

Five items are included in the assessment of State performance for the systemic factor of Case Review System. The items examine development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), implementation of procedures to seek TPR in accordance with the timeframes established in ASFA (item 28), and notification of foster and pre-adoptive parents and relative caregivers about schedules for case reviews and hearings and about their right to be heard in those proceedings (item 29).

Tennessee is not in substantial conformity with the systemic factor of Case Review System. Key findings of the 2008 CFSR were the following:

- Although case plans were reported to be developed for all children and efforts have been implemented in the State to increase engagement of families in the case planning process, information from the review process indicates that child and family involvement in case planning remains a challenge for the State (item 25).
- Tennessee was found to ensure that periodic reviews of the status of each child in foster care are held at least every 6 months either by the court or by the Foster Care Review Board. Periodic reviews are held every 6 months as required by State law; however, some counties require reviews to occur more often (item 26).
- Permanency hearings are held in the State 12 months from the time of the child's removal from the home and at least every 12 months thereafter (item 27).
- Although the State has a process for TPR, data and information examined during the CFSR process indicated that the TPR process is not clear and is sometimes conflicting. Additionally, the CFSR onsite case review findings show that TPR is not always filed in a timely manner, nor are compelling reasons for not filing documented (item 28).
- Foster parents, pre-adoptive parents, and relative caregivers of children are not consistently provided notification of reviews and hearings, nor are opportunities for these parties to be heard consistent across the State (item 29).

The State was not in substantial conformity with this systemic factor in the 2002 CFSR. Key concerns identified during the 2002 CFSR were the following:

- DCS had a process in place for a written case plan to be jointly developed by the child and parents; however, the information gathered during the review indicated that many children and parents were not involved in the development of the case plan.

- DCS had a process in place for TPR, but the information gathered during the review indicated that the State was not consistently seeking TPR in accordance with ASFA.
- DCS had a process in place for foster parents, pre-adoptive parents, and relative caregivers to be notified of and have opportunities to be heard in any review or hearing; however, the information gathered during the review indicated that parties did not always receive these notices or did not receive them in a timely manner.

The State implemented the following PIP strategies to address concerns related to the systemic factor Case Review System:

- The State implemented the Engaging Families Initiative to utilize full family involvement in permanency planning to move more quickly to permanency and to ensure preservation of relationships.
- The State drafted and implemented a legal risk policy to address the number of cases presented to the court as exceptions to reasonable efforts in order to expedite children's movement to permanent homes.
- The State expedited the process to finalize adoptions by having the DCS attorney work with adoptive parents' attorneys to get cases on the court schedule.
- The TPR process was expedited by the Tennessee Supreme Court adopting Rule 8A.
- The State put a monitoring plan in place comparing TPR cases prior to Rule 8A and the handling of TPR cases after the court's adoption of the rule.

The State met its goals for this systemic factor by the end of its PIP implementation period.

Quality Assurance System

Performance with regard to the systemic factor of a Quality Assurance (QA) System is based on whether the State has developed standards that ensure the safety and health of children in foster care (item 30) and whether the State is operating a statewide QA system that evaluates the quality and effectiveness of services and measures program Strengths and ANIs (item 31).

Tennessee is in substantial conformity with the systemic factor of a QA System. Key findings of the 2008 CFSR were the following:

- Tennessee has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of children (item 30).
- The State is operating a QA system that evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates implemented program improvement measures (item 31).

Tennessee was in substantial conformity with this systemic factor in its 2002 CFSR and was not required to address this factor in its PIP.

Staff and Provider Training

The systemic factor of Staff and Provider Training incorporates an assessment of the State's training provided to new caseworkers (item 32), the ongoing training provided to agency staff (item 33), and both initial and ongoing training provided to foster and adoptive parents (item 34).

Tennessee is in substantial conformity with the systemic factor of Staff and Provider Training. Key findings for this systemic factor in the 2008 CFSR were the following:

- Tennessee is operating a staff development and training program that provides initial training for all staff (item 32).
- The State requires 40 hours of annual in-service training for caseworkers and supervisors. Completion of the required training is tracked by a regional training coordinator (item 33).
- The State requires and provides 30 hours of pre-service Parents As Tender Healers (PATH) training. Additionally, the State requires 15 hours of in-service training within 12 months of a family being approved and 15 hours annually every year thereafter. PATH training and ongoing training are tracked by the Tennessee Center for Child Welfare and entered into TN Kids (item 34).

The State was not in substantial conformity with this outcome in the 2002 CFSR. The following key concerns were identified in the 2002 CFSR:

- Although DCS had established a new training division, the initial training did not sufficiently prepare staff for the work they are required to perform.
- Ongoing training was not sufficiently comprehensive to meet the needs of staff and needed to be strengthened in subject areas such as substance abuse and cultural competency.

The State implemented the following PIP strategies to address these identified concerns:

- The State implemented a competency- and skills-based pre-service training program based on the Standards of Professional Practice Manual.
- The State developed and began delivering competency-based in-service training.
- The State revised and implemented a comprehensive database system that monitors and tracks the training activities and hours for all DCS employees.

The State met its goals for this systemic factor by the end of the PIP implementation period.

Service Array and Resource Development

The assessment of the systemic factor of Service Array and Resource Development addresses three questions: Does the State have in place an array of services that meets the needs of children and families served by the child welfare agency (item 35)? Are the services

accessible to families and children throughout the State (item 36)? Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Tennessee is not in substantial conformity with the systemic factor of Service Array and Resource Development. Key findings of the 2008 CFSR were the following:

- The State has an array of services that addresses the needs of families in addition to individual children to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency (item 35).
- Information from the Onsite Review indicates that not all services are accessible to children and families throughout the State (item 36).
- Services in the State are not adequately individualized to meet the unique needs of children and families served by DCS because they are not available in many areas of the State (item 37).

The State was not in substantial conformity with this outcome in the 2002 CFSR. The following concerns were identified in the 2002 CFSR:

- There were significant gaps in services.
- Procedures were lacking in regard to a formal evaluation of the quality of services.
- Prevention services for families whose children remained in the home were not adequate, and caseworkers were not aware of the services that were available for these families.
- Accessing flexible funds to meet the unique needs of children and families involved a cumbersome process that resulted in caseworkers often not requesting the funds.
- Services in general were not adequately individualized to meet the unique needs of children and families served by DCS.
- Fewer services were available in rural areas, and children and families often had difficulty accessing services in these areas.
- Accessing flexible funds was often difficult and cumbersome and resulted in less appropriate services for children and families.

The State implemented the following PIP strategies to address these concerns:

- The State increased the availability of services to children in State custody and their families by the use of the Brian A. Needs Assessment process and resulting allocation of funds.
- The State modified contracts with provider agencies to include performance measures. Providers must report to ensure that standards are met.
- The State developed IL services to address service gaps for youth ages 14 and older, and staff and foster parents were trained on how to access IL services.
- The State increased the availability of services to children in State custody and their families by identifying appropriate funding streams to support child welfare services.

- The State identified appropriate funding streams to support child welfare services by conducting short- and long-term fiscal analyses and assessing and simplifying the flexible funding and needs assessment funding process.

The State met its goals for this systemic factor by the end of its PIP implementation period.

Agency Responsiveness to the Community

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the CFSP and producing annual reports (items 38 and 39) and the extent to which the State coordinates child welfare services with services or benefits of other Federal or Federally-assisted programs serving the same population (item 40).

Tennessee is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. Key findings for this factor in the 2008 CFSR were the following:

- The State engages consumers, service providers, foster care providers, the court, and other public and private child and family serving agencies in developing goals and objectives of the CFSP (item 38).
- Stakeholders indicated that DCS does not adequately consult with external stakeholders in developing Annual Progress and Services Reports (item 39).
- The State coordinates services provided by DCS with the services of other Federal or Federally-assisted programs that serve the same population (item 40).

Tennessee was in substantial conformity with this systemic factor in its 2002 CFSR and was not required to address the factor in its PIP.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the State's efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children (item 45).

Tennessee is in substantial conformity with the systemic factor of Foster and Adoptive Parent Licensing, Recruitment, and Retention in the 2008 CFSR. Key findings of the 2008 CFSR are the following:

- The State has implemented standards for foster family homes and child care institutions that are reasonably in accord with the recommended national standards (item 41).

- The State applies the standards equally to all licensed or approved foster family homes or child care institutions receiving title IV-E or title IV-B funds (item 42).
- The State complies with Federal requirements for criminal background clearances and other processes for addressing the safety of children in foster care and adoptive placements (item 43).
- There are minimal formal recruitment activities in the State and few that are geared to the recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed. Additionally, the State struggles with maintaining a sufficient pool of resource homes that match youth and children in custody, including African-American families, homes for large sibling groups, and homes for adolescents (item 44).
- DCS utilizes cross-jurisdictional resources to facilitate timely adoptive or permanent placements for children (item 45).

The State was in substantial conformity with this factor in the 2002 CFSR and was not required to address the factor in its PIP.

Table 1. Tennessee CFSR Ratings for Safety and Permanency Outcomes and Items

Outcomes and Indicators	Outcome Ratings			Item Ratings	
	In Substantial Conformity?	Percent Substantially Achieved*	Met National Standards?	Rating**	Percent Strength
Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect	No	53.3	Did not meet 2		
Item 1: Timeliness of investigations				ANI	52
Item 2: Repeat maltreatment				ANI	82
Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate	No	50.8			
Item 3: Services to prevent removal				ANI	72
Item 4: Risk of harm				ANI	51
Permanency Outcome 1: Children have permanency and stability in their living situations	No	27.5	Met 2; did not meet 2		
Item 5: Foster care reentry				ANI	85
Item 6: Stability of foster care placements				ANI	67.5
Item 7: Permanency goal for child				ANI	42.5
Item 8: Reunification, guardianship, and placement with relatives				ANI	43
Item 9: Adoption				ANI	37
Item 10: Other planned permanent living arrangements				N/A	N/A
Permanency Outcome 2: The continuity of family relationships and connections is preserved	No	57.5			
Item 11: Proximity of placement				Strength	97
Item 12: Placement with siblings				Strength	91
Item 13: Visiting with parents and siblings in foster care				ANI	68
Item 14: Preserving connections				ANI	85
Item 15: Relative placement				ANI	61
Item 16: Relationship of child in care with parents				ANI	43

*95 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an ANI. For an overall rating of Strength, 90 percent of the cases must be rated as a Strength.

Table 2. Tennessee CFSR Ratings for Child and Family Well-Being Outcomes and Items

Outcomes and Indicators	Outcome Ratings		Item Ratings	
	In Substantial Conformity?	Percent Substantially Achieved*	Rating**	Percent Strength
Well-Being Outcome 1: Families have enhanced capacity to provide for children’s needs	No	35.4		
Item 17: Needs/services of child, parents, and foster parents			ANI	38.5
Item 18: Child/family involvement in case planning			ANI	39
Item 19: Caseworker visits with child			ANI	63
Item 20: Caseworker visits with parents			ANI	26
Well-Being Outcome 2: Children receive services to meet their educational needs	No	83.3		
Item 21: Educational needs of child			ANI	83
Well-Being Outcome 3: Children receive services to meet their physical and mental health needs	No	66.1		
Item 22: Physical health of child			Strength	91
Item 23: Mental health of child			ANI	63

*95 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an ANI. For an overall rating of Strength, 90 percent of the cases reviewed for the item (with the exception of item 21) must be rated as a Strength. Because item 21 is the only item for Well-Being Outcome 2, the requirement of a 95-percent Strength rating applies.

Table 3: Tennessee CFSR Ratings for Systemic Factors and Items

Systemic Factors and Items	Substantial Conformity?	Score*	Item Rating**
Statewide Information System	Yes	4	
Item 24: The State is operating a statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care			Strength
Case Review System	No	2	
Item 25: The State provides a process that ensures that each child has a written case plan to be developed jointly with the child’s parents that includes the required provisions			ANI
Item 26: The State provides a process for the periodic review of the status of each child, no less frequently than once every 6 months, either by a court or by administrative review			Strength
Item 27: The State provides a process that ensures that each child in foster care under the supervision of the States has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter			Strength
Item 28: The State provides a process for termination of parental rights proceedings in accordance with the provisions of Adoption and Safe Families Act			ANI
Item 29: The State provides a process for foster parents, pre-adoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child			ANI
Quality Assurance System	Yes	4	
Item 30: The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of children			Strength
Item 31: The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the Child and Family Services Plan (CFSP) are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented			Strength
Staff and Provider Training	Yes	4	
Item 32: The State is operating a staff development and training program that supports the goals and objectives in the CFSP addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services			Strength
Item 33: The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP			Strength

Systemic Factors and Items	Substantial Conformity?	Score*	Item Rating**
Item 34: The States provide training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children			Strength
Service Array and Resource Development	No	2	
Item 35: The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency			Strength
Item 36: The services in item 35 are accessible to families and children in all political jurisdictions covered in the State's CFSP			ANI
Item 37: The services in item 35 can be individualized to meet the unique needs of children and families served by the agency			ANI
Agency Responsiveness to the Community	Yes	3	
Item 38: In implementing the provisions of the CFSP, the State engages in ongoing consultation with Tribal representatives, consumers, services providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP			Strength
Item 39: The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP			ANI
Item 40: The State's services under the CFSP are coordinated with services or benefits of other Federal or Federally-assisted programs serving the same population			Strength
Foster and Adoptive Parent Licensing, Recruitment, and Retention	Yes	3	
Item 41: The State has implemented standards for foster family homes and child care institutions which are reasonably in accord with recommended national standards			Strength
Item 42: The standards are applied to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds			Strength
Item 43: The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children			Strength
Item 44: The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom adoptive homes are needed			ANI

Systemic Factors and Items	Substantial Conformity?	Score*	Item Rating**
Item 45: The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children			Strength

*Scores range from 1 to 4. A score of 1 or 2 means that the factor is not in substantial conformity. A score of 3 or 4 means that the factor is in substantial conformity.

**Items may be rated as a Strength or as an ANI.

**Final Report
Tennessee Child and Family Services Review
April 2009**

**U.S. Department of Health and Human Services
Administration for Children and Families
Administration on Children, Youth and Families
Children's Bureau**

INTRODUCTION

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Tennessee. The CFSR is the Federal Government's program for assessing the performance of State child welfare agencies with regard to achieving positive outcomes for children and families. It is authorized by the Social Security Amendments of 1994 requiring the United States Department of Health and Human Services (HHS) to promulgate regulations for reviews of State child and family services programs under titles IV-B and IV-E of the Social Security Act. The CFSR is implemented by the Children's Bureau (CB) of the Administration for Children and Families within HHS.

The Tennessee CFSR was conducted the week of August 25, 2008. The period under review was from April 1, 2007, to August 29, 2008. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the Tennessee Department of Children's Services (DCS)
- The State Data Profile, prepared by CB within HHS, which provides State child welfare data for fiscal year (FY) 2004, FY 2005, and the 12-month CFSR period ending March 31, 2007
- Reviews of 65 cases at three sites across the State (31 cases in the Shelby County office, 17 cases in the Bradley County office, and 17 cases in the Putnam County office)
- Interviews or focus groups (conducted at all three sites and at the State level) with stakeholders, including but not limited to children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys

All 65 cases were open child welfare agency cases at some time during the period under review. The key characteristics of the 65 cases reviewed are presented in the Table of Case Characteristics on the following page. The percentages presented in this table and in subsequent tables may not total to exactly 100 percent because of rounding.

The first section of the report (Section A: Outcomes) presents the CFSR findings relevant to the State's performance in achieving specified outcomes for children in the areas of safety, permanency, and well-being. For each outcome, there is a table presenting the data for the case review findings and national indicators (when relevant). The table is followed by a discussion of the State's status with regard to substantial conformity with the outcome at the time of the State's first CFSR review, the State's status relevant to the current review, and a presentation and discussion of each item (indicator) assessed under the outcome. Differences in findings across the sites included in the Onsite Review are described when noteworthy. Variations in outcome and item ratings as a function of type of case (i.e., foster care or in-home services) also are identified when appropriate. The

second section of the report (Section B: Systemic Factors) provides an assessment and discussion of the systemic factors relevant to the child welfare agency's ability to achieve positive outcomes for children.

It is important to note that DCS has been operating under the Brian A. Settlement Agreement since July 7, 2001. Brian A. requires improvements of DCS and establishes the outcomes to be achieved by the State on behalf of children in custody and their families in the core areas of safety, permanency, and well-being. The "Brian A. class" includes all children in custody either because they were abused or neglected or because they engaged in noncriminal misbehavior (truancy, running away from home, parental disobedience, violation of a valid court order, or other "unruly child" offense). Some of the information from the data reports required by Brian A. that are presented in the Statewide Assessment is included in this CFSR report.

Table 1. Case Characteristics for Tennessee

Case Characteristics	Foster Care Cases	In-Home Cases
Total Cases	40	25
When case was opened/child entered foster care		
Open prior to the period under review	28 (70%)	10 (40%)
Open during the period under review	12 (30%)	15 (60%)
Child entered foster care during the period under review	13 (32.5%)	*
Child's age at start of period under review		
Younger than age 10	19 (47.5%)	*
At least 10 but younger than 13	4 (10%)	*
At least 13 but younger than 16	11 (27.5%)	*
16 and older	6 (15%)	*
Race/Ethnicity		
American Indian/Alaskan Native (Non-Hispanic)	0 (0%)	*
Asian (Non-Hispanic)	0 (0%)	*
Black (Non-Hispanic)	16 (40%)	*
Hawaiian/Pacific Islander (Non-Hispanic)	0 (0%)	*
Hispanic	0 (0%)	*
White (Non-Hispanic)	24 (60%)	*
Unknown/unable to determine	0 (0%)	*
Two or more races (Non-Hispanic)	0 (0%)	*
Primary reason for opening case		
Neglect (not including medical neglect)	13 (32.5%)	5 (20%)
Physical abuse	6 (15%)	5 (20%)
Sexual abuse	2 (5%)	0 (0%)
Medical neglect	0 (0%)	0 (0%)
Substance abuse by parent	3 (7.5%)	2 (8%)
Domestic violence in child's home	1 (2.5%)	1 (4%)
Emotional maltreatment	0 (0%)	0 (0%)
Abandonment	5 (12.5%)	0 (0%)
Mental/physical health of parent	2 (5%)	0 (0%)
Mental/physical health of child	0 (0%)	0 (0%)
Child's behavior	4 (10%)	8 (32%)

Substance abuse by child	0 (0%)	2 (8%)
Child in juvenile justice system	0 (0%)	2 (8%)
Other	4 (10%)	0 (0%)

*Information on these characteristics for in-home services cases is not provided because all children in the family are considered in these cases.

All 65 cases were open child welfare agency cases at some time during the period under review of April 1, 2007, through August 29, 2008.

SECTION A: OUTCOMES

In the Outcomes Section of the CSFR Final Report, an overall rating of Strength or Area Needing Improvement (ANI) is assigned to each of the 23 indicators (items) reviewed. An item is assigned an overall rating of Strength if 90 percent of the applicable cases reviewed were rated as a Strength. The item ratings are used to determine the performance of a State on the seven outcomes, each of which incorporates one or more of the individual items. The evaluation options for these outcomes are “substantially achieved,” “partially achieved,” and “not achieved.” For a State to be in substantial conformity with a particular outcome, 95 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome. Two outcomes—Safety Outcome 1 and Permanency Outcome 1—also are evaluated based on State performance with regard to six national data indicators. For a State to be in substantial conformity with these outcomes, the national standards for each data indicator must be met as well as the case review requirements. A State that is not in substantial conformity with a particular outcome must develop and implement a program improvement plan (PIP) to address the areas of concern identified for that outcome.

CB has established a very high standard of performance for the CFSR. The standards are based on the belief that because child welfare agencies work with our nation’s most vulnerable children and families, only the highest standards of performance should be considered acceptable. The standards are set high to ensure ongoing attention to achieving positive outcomes for children and families with regard to safety, permanency, and well-being. This is consistent with the goal of the CFSR to promote continuous improvement in performance on these outcomes.

It should be noted, however, that States are not required to attain either the 95-percent standard established for the CFSR Onsite Review or the national standards for the six data indicators by the end of their PIP implementation. CB recognizes that the kinds of systemic and practice changes necessary to bring about improvement in particular outcome areas often take time to implement. Also, improvements are likely to be incremental rather than dramatic. Instead, States work with CB to establish a specified amount of improvement or to determine specified activities for their PIP. That is, for each outcome that is not in substantial conformity or item that is an ANI, each State (working in conjunction with CB) specifies the following: (1) how much improvement the State will demonstrate and/or the activities that it will implement to address the ANIs and (2) the procedures for demonstrating the achievement of these goals. Both the improvements specified and the procedures for demonstrating improvement vary across States. Therefore, a State can meet the requirements of its PIP and still not perform at the 95-percent (for outcomes) or the 90-percent (for items) levels established for the CFSR.

The second round of the CFSR assesses a State's current level of performance by once more applying the high standards and a consistent, comprehensive, case review methodology. The results of this effort are intended to serve as the basis for continued PIPs addressing areas in which a State still needs to improve, even though prior PIP goals may have been achieved. The purpose is to ensure that program improvement is an ongoing process and does not end with the completion of a PIP.

In the following sections, information is provided pertaining to how the State performed on each outcome in the first round of the CFSR. If the outcome was not substantially achieved during the first round, the key concerns observed at that time are identified as well as the strategies implemented in the PIP to address those concerns.

Because many changes were made in the CFSR process based on lessons learned during the first round and in response to feedback from the child welfare field, a State's performance in the second round of the CFSR is not directly comparable to its performance in the first round, particularly with regard to comparisons of data indicators or percentages regarding Strength and ANI ratings. Key changes in the CFSR process that make it difficult to compare performance across reviews include, but are not limited to, the following:

- An increase in the sample size from 50 to 65 cases
- Stratification of the sample to ensure a minimum number of cases in key program areas, resulting in variations in the number of cases relevant for specific outcomes and items
- Changes in criteria for specific items to enhance consistency and ensure an assessment of critical areas such as child welfare agency efforts to involve noncustodial parents in planning for their children

I. SAFETY

Safety Outcome 1

Outcome S1: Children are, first and foremost, protected from abuse and neglect					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	5	7	4	16	53.3
Partially Achieved	2	0	3	5	16.7
Not Achieved or Addressed	3	2	4	9	30.0
Total Applicable Cases	10	9	11	30	
Not Applicable Cases	7	8	20	35	
Total Cases	17	17	31	65	
Conformity of Statewide data indicators with national standards					
	National Standard (%)		State's Percent	Meets Standard	
Absence of maltreatment recurrence	94.6 +		92.9	No	
Absence of maltreatment of children in foster care by foster parents or facility staff	99.68 +		99.2	No	

Status of Safety Outcome 1

Tennessee is not in substantial conformity with Safety Outcome 1. The outcome was determined to be substantially achieved in 53.3 percent of the applicable cases, which is less than the 95 percent required for a rating of substantial conformity. Safety Outcome 1 was substantially achieved in 78 percent of applicable Putnam County cases, 50 percent of applicable Bradley County cases, and 36 percent of applicable Shelby County cases. In addition, Tennessee did not meet the national standard for the measure assessing the absence of maltreatment recurrence or the national standard for the measure assessing absence of maltreatment of children in foster care. The State was not in substantial conformity with this outcome in its first CFSR, conducted in 2002, and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The key concern identified in the 2002 CFSR was that investigations of maltreatment allegations were not initiated in accordance with the timeframes established by State policy. To address this concern, the State implemented the following strategies in its PIP:

- Established a statewide Central Intake Unit
- Reviewed and revised policies and definitions related to response times to maltreatment allegations and trained staff on revisions
- Implemented the Special Investigations Team as a means to build expertise and contribute to improved response times
- Conducted a workload analysis to determine the appropriate number of investigative staff needed in each region and then made changes in Child Protective Services (CPS) staff based on the recommendations resulting from this analysis
- Developed and implemented competency-based in-service training for CPS supervisors
- Enhanced the partnership of DCS, the Child Advocacy Center, and Child Protective Investigative Teams (CPIT)

The State met its goals for this outcome by the end of the PIP implementation period.

Key Findings of the 2008 CFSR

The findings pertaining to the specific items assessed under Safety Outcome 1 during the 2008 CFSR are presented below.

Item 1. Timeliness of initiating investigations of reports of child maltreatment

Strength Area Needing Improvement

Case Review Findings

The assessment of item 1 was applicable for 29 (45 percent) of the 65 cases. Cases were not applicable if there were no child maltreatment reports during the period under review. In assessing item 1, reviewers were to determine whether the response to a maltreatment report occurring during the period under review had been initiated in accordance with the State child welfare agency policy requirements.

According to Tennessee policy:

- Priority 1 (P-1) reports allege that children may be in imminent danger and must be initiated by face-to-face contact with the victim immediately, but no later than 24 hours.
- Priority 2 (P-2) reports allege injuries or risk of injuries that are not imminent, life threatening, or do not require immediate medical care and must be initiated by face-to-face contact with the victim within 48 hours.
- Priority 3 (P-3) reports allege situations/incidents that are considered to pose a low risk of harm to the child and must be initiated by face-to-face contact with the victim within 3 business days.

The results of the assessment of this item are presented in the table below.

Item 1	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	5	7	3	15	52
Area Needing Improvement	5	2	7	14	48
Total Applicable Cases	10	9	10	29	
Not Applicable	7	8	21	36	
Total Cases	17	17	31	65	

Item 1 was rated as a Strength in 78 percent of applicable Putnam County Cases, 50 percent of applicable Bradley County cases, and 30 percent of applicable Shelby County cases. Item 1 was rated as a Strength in 15 cases when the investigation was initiated and face-to-face contact was established with the children in the family within the timeframes required by State policy or law. Item 1 was rated as an ANI in 14 of the 29 applicable cases when the investigation, including establishing face-to-face contact with the child, was not initiated within the timeframes required by State policy.

The priorities of the referrals for which the cases* were rated as ANI were:

- P-1: four cases
- P-2: eight cases
- P-3: seven cases
- Not indicated: one case

*Many of the applicable cases had multiple referrals.

Rating Determination

Item 1 was assigned an overall rating of an ANI. In 52 percent of the applicable cases, reviewers determined that the agency had initiated an investigation of a maltreatment report in accordance with required timeframes. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

The Statewide Assessment reports the findings below with regard to compliance with the State timeframes for initiating an investigation (including face-to-face contact with the alleged victim). The average compliance ratio for the three priority response times for January 2007 to December 2007 was:

- P-1 reports: 53 percent compliance
- P-2 reports: 64.5 percent compliance
- P-3 reports: 65.6 percent compliance

The Statewide Assessment reports that compliance with P-1 reports increased from 53 percent in December 2007 to 77.7 percent in February 2008. The Statewide Assessment also reports that in a review of individual cases, DCS found that caseworkers were initiating contacts with the child in a timely manner, but were not documenting this contact in a timely fashion. This review also revealed that in severe abuse cases, law enforcement may contact a caseworker directly for an immediate response to a situation, and then the call to the Central Intake is made at a later time, which is reported as a negative percentage in the data system.

As indicated in the Statewide Assessment, DCS's data tracking system, TN Kids, produces and distributes monthly reports regarding compliance with response times. These data are used to identify whether there is a need for technical assistance to improve practice. According to the Statewide Assessment, monthly data reports are reviewed by all levels of management.

Stakeholder Interview Information

The majority of stakeholders from the three review sites commenting on this item during the Onsite Review expressed the opinion that investigations are generally initiated in a timely manner. Stakeholders in Bradley County and Putnam County reported that it is sometimes difficult to meet P-3 timeframes.

Stakeholders in Shelby County and Bradley County reported that some reports are not assigned the correct priority. Additionally, stakeholders in Putnam County reported that some cases are screened out by Central Intake when the report should be assigned.

Item 2. Repeat maltreatment

 Strength X Area Needing Improvement

Case Review Findings

The assessment of item 2 was applicable for 17 (26 percent) of the 65 cases. Cases were not applicable for this item if there was no substantiated or indicated maltreatment report during the period under review. For all applicable cases, reviewers were to determine whether there had been a substantiated or indicated maltreatment report on the family during the period under review, and if so, whether another substantiated or indicated report involving similar circumstances had occurred within a 6 month period before or after that identified report. Information regarding the ratings is provided in the table below.

Item 2	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	4	4	6	14	82
Area Needing Improvement	0	0	3	3	18
Total Applicable Cases	4	4	9	17	
Not Applicable	13	13	22	48	
Total Cases	17	17	31	65	

This item was rated as a Strength in 100 percent of applicable Bradley County and Putnam County cases and 67 percent of applicable Shelby County cases. Item 2 was rated as a Strength in 14 cases when there was no indication of two or more substantiated or indicated maltreatment reports on the family within a 6-month period. Item 2 was rated as an ANI in two cases because there were two substantiated maltreatment reports involving similar circumstances within a 6-month period. Item 2 was rated as an ANI in one case because there were three substantiated maltreatment reports within a 4-month period during the period under review.

Although reports occurring prior to the period under review are not included in the ratings, reviewers found that in 36 of the cases reviewed, there were multiple maltreatment reports on the family during the life of the case. Information regarding the disposition of reports that were received prior to the period under review is not available.

Rating Determination

Item 2 was assigned an overall rating of an ANI. In 82 percent of the applicable cases, reviewers determined that there was no recurrence of maltreatment within a 6-month period. This percentage is less than the 90 percent required for a rating of Strength. This item was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, TN Kids cannot track repeat maltreatment of children. When caseworkers receive subsequent referrals on active cases, a cursory review from the TN Kids data system is included with the referral to inform the investigating caseworker of past involvement with the child and family.

As reported in the Statewide Assessment, DCS has implemented an alternative response system called the Multiple Response System (MRS). The MRS includes three tracks—an investigation track, an assessment track, and a resource linkage track. The Statewide Assessment indicates that the MRS is a promising approach by DCS to reduce the recurrence of maltreatment. MRS encourages staff to follow up on all cases and to engage families to participate in the development of noncustodial permanency plans to address their needs. MRS also encourages staff to identify the resources necessary to strengthen the family and create a team to support the family. After some initial fluctuations due to the implementation of a new process, most regions are finding that approximately 25 percent of the maltreatment reports received are assigned to the investigative track while 75 percent are assigned to the assessment track.

Stakeholder Interview Information

Putnam County and Shelby County stakeholders commenting on this item during the onsite CFSR indicated that maltreatment recurrence is not a significant problem in their counties. They noted, however, that when there is maltreatment recurrence, it frequently is related to parental substance abuse. Shelby County stakeholders also reported seeing recurrence in sexual abuse cases, sometimes with the same perpetrator and sometimes with a different perpetrator. Shelby County and Putnam County stakeholders also reported that closing cases and reuniting families before the problems have been fully resolved contributes to repeat maltreatment. Bradley County stakeholders did not comment on this item.

According to stakeholders at the State level, the Brian A. Settlement Agreement requires that all cases with three or more maltreatment reports be reviewed by Evaluation and Monitoring (E&M) Division staff. Additionally, based on the Settlement Agreement, E&M staff are required to review all foster care cases with substantiated maltreatment reports.

Safety Outcome 2

Safety Outcome S2: Children are safely maintained in their homes whenever possible and appropriate					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	11	12	10	33	50.8
Partially Achieved	3	2	8	13	20.0
Not Achieved or Addressed	3	3	13	19	29.2
Total Cases	17	17	31	65	

Status of Safety Outcome 2

Tennessee is not in substantial conformity with Safety Outcome 2. The outcome was determined to be substantially achieved in only 50.8 percent of the cases reviewed, which is less than the 95 percent or higher required for a rating of substantial conformity. The outcome was substantially achieved in 71 percent of applicable Putnam County cases, 65 percent of applicable Bradley County cases, and 32 percent of applicable Shelby County cases. The State was not in substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The following concerns were identified in the 2002 CFSR:

- Services were not provided on a consistent basis that was sufficient to maintain children safely in their homes.
- Caseworkers were inconsistent in conducting comprehensive risk and needs assessments, monitoring families on an ongoing basis to ensure children’s safety, and assessing change in risk factors prior to reunification.

To address the identified concerns, the State implemented the following strategies in its PIP:

- The State implemented the Functional Assessment Initiative (FAI) to address the frequency and quality of initial and ongoing child and family assessments.
- The State increased service availability by the use of the Brian A. Needs Assessment process and resulting allocation of funds.

The State met its goals for this outcome by the end of the PIP implementation period.

Key Findings of the 2008 CFSR

The findings pertaining to the specific items assessed under Safety Outcome 2 during the 2008 CFSR are presented below.

Item 3. Services to family to protect child(ren) in home and prevent removal and reentry into foster care

 Strength X Area Needing Improvement

Case Review Findings

An assessment of item 3 was applicable in 36 (55 percent) of the 65 cases. Cases were excluded from this assessment if the children entered foster care prior to the period under review and there were no other children in the home or if there was no substantiated or indicated maltreatment report or identified risk of harm to the children in the home during the period under review. For this item, reviewers assessed whether, in responding to a substantiated maltreatment report or risk of harm, the agency made diligent efforts to provide services to families to prevent placement of children in foster care while at the same time ensuring their safety. The results of this assessment are shown in the table below.

Item 3	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	7	9	10	26	72
Area Needing Improvement	1	0	9	10	28
Total Applicable Cases	8	9	19	36	
Not Applicable	9	8	12	29	
Total Cases	17	17	31	65	

The item was rated as a Strength in 100 percent of applicable Putnam County cases, 87.5 percent of applicable Bradley County cases, and 53 percent of applicable Shelby County cases.

Item 3 was rated as a Strength in 26 cases when reviewers determined one or more of the following:

- Services were provided to the parents and child to prevent removal (15 cases).
- The child was appropriately removed from the home to ensure the child's safety (11 cases).
- Services were provided after the child was reunified with his/her parents to prevent reentry (four cases).

Case review information indicates that a broad range of services was offered or provided to families. These included services provided by agency staff and the following additional services:

- Family crisis intervention
- Medical assessments for youth
- Behavioral management
- Parenting skills assessment and education
- Funds for utilities
- Substance abuse assessment and treatment
- Individual therapy
- Family therapy
- Education services
- Child care services
- Transportation services
- Mental health assessments and treatment
- Housing
- Psychological evaluations

Item 3 was rated as an ANI in 10 cases when reviewers determined that services were not provided to ensure the safety of children remaining in their homes.

Rating Determination

Item 3 was assigned an overall rating of ANI. In 72 percent of the cases, reviewers determined that the agency had made concerted efforts to maintain children safely in their own homes. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that Child and Family Team Meetings (CFTM) be held prior to a child entering custody. During the precustodial meeting, the team attempts to place services in the home to prevent removal. However, as reported in the Statewide Assessment, the CFTM data from October 1, 2007, through December 1, 2007, indicate that only 29 percent of children that entered custody had a precustodial meeting. The Statewide Assessment also reports that 77 percent of the children that had a precustodial meeting did not enter custody.

As reported in the Statewide Assessment, as a result of the MRS implementation, collaborative partnerships have been formed statewide to expand the services available to prevent children from entering custody. However, the Statewide Assessment also indicates that the availability of community-based services in rural areas has been a barrier to providing timely and appropriate resources to families.

The Statewide Assessment reports that during a focus group with service providers, participants noted that the department's increased focus on preventive services and on relative placements has had a positive impact on preventing custody.

Stakeholder Interview Information

According to stakeholders at the State level commenting on this item during the Onsite Review, the courts have concerns about DCS "forcing" parents to voluntarily place children with friends or relatives as part of a safety plan to prevent removal.

According to stakeholders, in response to these concerns, DCS initiated policy mandating that petitions be filed if an out-of-home placement is needed for more than 1 or 2 days.

Stakeholders in Bradley County commenting on this item during the Onsite Review indicated that as a pilot county MRS, they have witnessed a paradigm shift to engaging families, focusing on services, and placement prevention. Staff have access to flexible funds up to \$350 to assist families with immediate needs. As a result, there are fewer children being placed in foster care, fewer children in foster care, and less recurrence of maltreatment. However, some stakeholders indicated at times caseworkers put a safety plan in place when removal is actually necessary to protect the child. DCS staff have worked with the community on connecting families to resources prior to referring to DCS. As a result, resource linkage is helping the community develop additional resources.

Stakeholders in Putnam County reported that DCS is diligent in locating services to maintain children in their homes. However, according to some stakeholders, removals are not occurring when they should.

Shelby County stakeholders reported that services are available to families if they are willing to accept the services. Family preservation services are provided by Family Preservation Teams. According to some stakeholders, the teams are overwhelmed and need more staff. Additionally, according to stakeholders, services do not always match the need nor is the expertise to address the underlying issues sufficient.

According to stakeholders in Bradley County, the Department of Juvenile Justice (DJJ) has services such as alternative schools, counseling, and alcohol and drug counseling to prevent removal. Putnam County stakeholders reported that the court in their

community makes every effort to keep DJJ children from coming into care. According to these stakeholders, the court’s diversion program and intensive probation program are successful in keeping children from entering care. However, stakeholders reported that there has been a loss of grant money from the State budget, which affects the intensive probation program.

Item 4. Risk of harm to child

 Strength **X** Area Needing Improvement

Case Review Findings

An assessment of item 4 was applicable for all 65 cases. In assessing item 4, reviewers were to determine whether the agency had made, or was making, diligent efforts to address the risk of harm to the children involved in each case. The results of this assessment are shown in the table below.

Item 4	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	11	12	10	33	51
Area Needing Improvement	6	5	21	32	49
Total Cases	17	17	31	65	

The item was rated as a Strength in 71 percent of Putnam County cases, 65 percent of Bradley County cases, and 32 percent of Shelby County cases.

Item 4 was rated as a Strength in 33 cases when reviewers determined that the risk of harm to children was appropriately addressed by the agency through (1) conducting initial and ongoing assessments of risk and safety either in the children’s home or in the children’s foster home and (2) addressing all safety-related concerns identified through the assessment.

Item 4 was rated as an ANI in 32 cases when reviewers determined the following:

- There was a lack of adequate initial and ongoing safety and risk assessments during the period under review (22 cases).
 - Three cases lacked initial safety and risk assessments.
 - Thirteen cases lacked ongoing safety and risk assessments.
 - Six cases lacked both initial and ongoing assessments.
- There was a lack of adequate safety and risk assessments prior to case closure (three cases).

- There was a lack of safety and risk assessments prior to relative placement (two cases).
- There was risk of harm in the foster care setting, and safety and risk were not assessed (three cases).
- Risk was not assessed prior to or following reunification (one case).
- There were safety concerns during visitation with parents that were not adequately addressed (one case).

In 11 of the 32 cases rated as ANIs, the CFSR reviewers noted that risk and safety pertaining to siblings of the target child or the siblings of the child who was the focus of the investigation were not assessed in any way.

Rating Determination

Item 4 was assigned an overall rating of ANI. Reviewers determined that the agency had appropriately addressed the risk of harm to the children in 51 percent of the cases. This percentage is less than the 90 percent required for an overall rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS is currently using the Structured Decision Making (SDM) assessment process, which includes tools for Safety Assessment, Immediate Protection Agreement, Family Risk Assessment, and Family Risk Reassessment for nonprotective custody cases. However, the Statewide Assessment also notes that a key concern identified by DCS is that caseworker practice is inconsistent with regard to conducting comprehensive risk/needs assessments, monitoring families on an ongoing basis to ensure children's safety, and assessing change in risk factors prior to reunification. Additionally, the Statewide Assessment reports that challenges exist within DCS in relation to caseworkers' ability to complete thoughtful and thorough safety and risk assessments. As reported in the Statewide Assessment, caseworkers often fail to recognize factors that place a child at risk of harm while at home or in foster care. The lack of understanding, according to the Statewide Assessment, may be based in part to insufficient training on the assessment tools.

Stakeholder Interview Information

Stakeholders at the three review sites commenting on this item during the Onsite Review expressed the opinion that DCS generally assesses safety and risk in all cases. However, stakeholders also noted that referrals are not always appropriately prioritized in Central Intake, which may affect the timeliness of risk and safety assessments and the ability to provide services to families in a timely manner.

Stakeholders indicated that there are several assessment tools in place to assess and reassess safety and risk during the CPS and Assessment track process. The assessment tools mentioned by stakeholders were:

- Family Advocacy and Support Tool (FAST)
- SDM Safety Assessment
- Safety Plans
- SDM Family Assessment
- Family Functional Assessment (FFA)

Stakeholders in Bradley County reported that safety decisions have improved with the use of the SDM tools. Additionally, stakeholders in Bradley County reported that CFTMs and Family Services Team Meetings (FSTMs) have opened communication with families, which allows for more thorough discussions about safety and risk factors. Some Putnam County stakeholders, however, reported concern that caseworkers may not always address the underlying issues that cause the safety and risk factors.

In addition to assessing safety and risk in the CPS and Assessment stage, stakeholders at the three review sites reported that DCS responds immediately to any safety or risk factors reported in foster homes.

II. PERMANENCY

Permanency Outcome 1

Outcome P1: Children have permanency and stability in their living situations					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	1	4	6	11	27.5
Partially Achieved	6	5	13	24	60
Not Achieved or Addressed	3	1	1	5	12.5
Total Applicable Foster Care Cases	10	10	20	40	
Not Applicable Foster Care Cases	0	0	0	0	

Conformity of Statewide data indicators with national standards			
	National Standard (Scaled Score)	State's Composite Score	Meets Standard
Composite 1: Timeliness and permanency of reunification	122.6 +	119.4	No
Composite 2: Timeliness of adoptions	106.4 +	136.7	Yes
Composite 3: Permanency for children in foster care for extended time periods	121.7 +	152.4	Yes
Composite 4: Placement stability	101.5 +	85.9	No

Status of Permanency Outcome 1

Tennessee is not in substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in only 27.5 percent of the cases, which is less than the 95 percent required for a rating of substantial conformity.
- The State Data Profile indicates that for the CFSR 12-month target period for the data indicators, the State did not meet the national standards for Permanency Composite 1 (timeliness and permanency of reunification) and Permanency Composite 4 (placement stability).

However, the State did meet the national standard for Permanency Composite 2 (timeliness of adoptions) and Permanency Composite 3 (permanency for children in foster care for extended time periods). Performance on the individual measures included in the composites is presented in the discussion of the items related to each measure.

The outcome was substantially achieved in 40 percent of Putnam County cases, 30 percent of Shelby County cases, and 10 percent of Bradley County cases. Tennessee was not in substantial conformity with Permanency Outcome 1 in the 2002 CFSR and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The following concerns were identified in the 2002 CFSR:

- Most children in the foster care cases reviewed did not have permanency and stability in their living situations.

- Agency practice was inconsistent with regard to establishing appropriate permanency goals and achieving adoptions in a timely manner.
- The goal of other planned permanent living arrangement (OPPLA) was being established for children without a thorough exploration of other permanency options.

To address these concerns, Tennessee implemented the following strategies in its PIP:

- The State conducted a statewide assessment to determine resources needed in each region.
- The State utilized a backlog review process to review cases, facilitate staffing, and provide support services. The State developed and implemented regional plans for redesigning the DCS structure to improve permanency planning.
- The State increased the availability of services to children and their families by using the Brian A. Needs Assessment process and resulting allocation of funds.
- The State developed and implemented a statewide post-adoption service program to support families that adopt children from the child welfare system.

Tennessee met its goals for this outcome by the end of its PIP implementation period.

Key Findings of the 2008 CFSR

Findings pertaining to the specific items assessed under Permanency Outcome 1 during the 2008 CFSR are presented below.

Item 5. Foster care reentries

Strength Area Needing Improvement

Case Review Findings

An assessment of item 5 was applicable for 13 (32.5 percent) of the 40 foster care cases. Cases were not applicable if the child did not enter foster care during the period under review. In assessing this item, reviewers determined whether the entry into foster care during the period under review occurred within 12 months of discharge from a prior foster care episode. The results of this assessment are presented in the table below.

Item 5	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	3	2	6	11	85
Area Needing Improvement	0	0	2	2	15
Total Applicable Foster Care Cases	3	2	8	13	
Not Applicable Foster Care Cases	7	8	12	27	
Total Foster Care Cases	10	10	20	40	

This item was rated as a Strength in 100 percent of applicable Bradley County and Putnam County cases and 75 percent of applicable Shelby County cases.

Item 5 was rated as a Strength in 9 of the 13 applicable foster care cases because the child’s entry into foster care during the period under review did not take place within 12 months of discharge from a prior episode. Item 5 was rated as a Strength in 2 of the 13 applicable case because the agency made concerted efforts to prevent the child’s reentry into foster care. This item was rated as an ANI in two cases when the child reentered foster care within 12 months of discharge of a prior episode and the agency did not make concerted efforts to prevent the reentry. One child reentered foster care within 6 months, and the other child reentered foster care in approximately 2 months.

Rating Determination

Item 5 was assigned an overall rating of ANI. Reviewers determined that in 85 percent of the applicable cases, the child’s entry into foster care was not within 12 months of a prior foster care episode. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State’s 2002 CFSR.

Performance on the Composite 1 Measure Relevant to the Permanency of Reunification

The data below are presented to provide additional information about foster care reentry. There is no national standard for the measure of foster care reentry. National standards with regard to permanency have been established only for the scaled composite scores.

The measure of foster care reentry is part of Composite 1: Timeliness and permanency of reunification. The State’s performance on Composite 1 is shown in the table for Permanency Outcome 1.

Tennessee’s performance on the individual measure of foster care reentry (measure C1.4) included in Composite 1: Timeliness and permanency of reunification was as follows: 14.9 percent of the children exiting foster care to reunification in the 12 months prior to the CFSR 12-month target period reentered foster care in less than 12 months from the time of discharge. This percentage is lower than the national median of 15.0 percent, but higher than the national 25th percentile of 9.9 percent. For this measure, lower percentages are associated with higher levels of performance.

Statewide Assessment Information

According to the Statewide Assessment, DCS has made a practice of returning children home to their parents as soon as safely possible. Although reunification is successful in many cases due to the provision of supportive services, parental substance abuse and mental health issues can present a challenge to preventing reentry into State custody. DCS, as reported in the Statewide Assessment, has focused on team decision-making and careful monitoring upon return home to ensure successful reunification and prevent multiple custody episodes. When the Child and Family Team (CFT) determines the family is ready for reunification, the child is returned home, upon court approval, for a trial home visit, which lasts 90 days unless extended by court order. The services to the family can be extended on a noncustodial basis for as long as necessary to ensure the success of the family placement.

The Statewide Assessment reports that although DCS has made progress in partnering with the court system to improve outcomes for children, some courts still disregard caseworker assessments and return children home against the recommendation of DCS. In these situations, families often will refuse post-custody services.

Stakeholder Interview Information

Many stakeholders commenting on this item during the onsite CFSR expressed the opinion that reentries into foster care occur but are rare. Shelby County stakeholders reported that DCS in that county does not reunify families before problems are resolved and generally provides services to prevent reentry when families are reunified. Shelby County stakeholders also reported that the court has returned children to their parents against the recommendation of DCS.

Item 6. Stability of foster care placement

Strength Area Needing Improvement

Case Review Findings

All 40 foster care cases were applicable for an assessment of item 6. In assessing this item, reviewers were to determine whether the child experienced multiple placement settings during the period under review and, if so, whether the changes in placement settings were necessary to achieve the child's permanency goal or meet the child's service needs. Reviewers also assessed the stability of the child's current placement setting. The findings of this assessment are presented in the table below.

Item 6	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	3	8	16	27	67.5
Area Needing Improvement	7	2	4	13	32.5
Total Applicable Foster Care Cases	10	10	20	40	
Not Applicable Foster Care Cases	0	0	0	0	

Item 6 was rated as a Strength in 80 percent of Shelby County and Putnam County cases and 30 percent of Bradley County cases.

Item 6 was rated as a Strength when reviewers determined the following:

- The child did not experience a placement change during the period under review, and either the current placement was stable or the child was discharged from foster care during the period under review (22 cases).
- The placement changes experienced were in the child's best interests and were intended to further achievement of the child's permanency goal or to provide specialized services to the child (five cases).

Item 6 was rated as an ANI when reviewers determined that the child was in multiple placement settings during the period under review, and at least one placement change was not planned by the agency to further attainment of the child's permanency goal (13 cases). In eight of these cases, placements disrupted at the request of the foster parent or relative caregiver because they did not believe that they could meet the needs of the child or adequately handle the child's behaviors. Additionally, in one of the 13 cases, the child's placement setting at the time of the onsite CFSR was not stable.

Additional findings of the case review were the following:

- Children in 22 cases experienced only one placement during the period under review.
- Children in 10 cases experienced two placements during the period under review.
- Children in eight cases experienced three or more placements during the period under review, including one case with five placements.

Rating Determination

Item 6 was assigned an overall rating of ANI. In 67.5 percent of the applicable cases, reviewers determined that children experienced placement stability or that changes in placement were in the best interests of the child. This percentage is less than the 90 percent required for a rating of Strength. Item 6 also was rated as an ANI in the State's 2002 CFSR.

Performance on the Individual Measures Included in Composite 4: Placement stability

The data below are presented to provide additional information about placement stability. There are no national standards for the individual measures of placement stability. National standards have been established only for the scaled composite scores for Composite 4: Placement stability. The State's performance on Composite 4 is shown in the table for Permanency Outcome 1.

Tennessee's performance on the individual measures of placement stability included in Composite 4: Placement stability is reported below:

- 77.4 percent of the children in foster care for at least 8 days but less than 12 months experienced two or fewer placement settings. This percentage is less than the national median for this measure of 83.3 percent.
- 51.5 percent of the children in foster care for at least 12 months but less than 24 months experienced two or fewer placement settings. This percentage is less than the national median for this measure of 59.9 percent.
- 37.3 percent of the children in foster care for at least 24 months experienced two or fewer placement settings. This percentage is higher than the national median for this measure of 33.9 percent but is less than the 75th percentile of 41.8 percent.

Statewide Assessment Information

According to the Statewide Assessment, DCS has a quality assurance (QA) system designed to evaluate best practice casework, implement improvement strategies, and monitor performance. The Quality Services Review (QSR) is one of the primary means of QA. The Statewide Assessment reports that the third year of QSRs was completed during the spring of 2008. Results from the first year (2005-2006) and the results from the reviews in six regions for which scoring has been completed for the 2007-2008 review year were reported throughout the Statewide Assessment.

According to the Statewide Assessment, the department uses qualitative data from TN Kids, reports issued relative to the Brian A. Settlement Agreement, contractor data, case file reviews, and QSR results to understand stability for children in a number of different entry and exit cohorts and over time. As reported in the Statewide Assessment, data indicate 88 percent of children in foster care at the beginning of 2006, had two or fewer placement moves during that same year. Of the children who came into

foster care sometime during 2006, 85 percent experienced two or fewer placement moves. In the September 2007 report by the Brian A Technical Assistance Committee, 83.9 percent of children had two or fewer placement moves.

As reported in the Statewide Assessment, the Appropriate Placement and Acceptable Placement Supports indicators in the QSR relate to placement stability. In the 2007-2008 QSRs, 89 percent of cases reviewed rated acceptably on Appropriate Placement, and 80 percent of cases rated acceptably on Placement Supports.

According to the Statewide Assessment, more resource homes are needed for teenagers, especially those with behavior problems. Some resource parents are reluctant to accept troubled teenagers due to the media coverage of teen violence in resource homes. Other resource parents, who have children of their own, are not willing to take teenage mothers and their babies.

Stakeholder Interview Information

Stakeholders in Bradley County and Putnam County commenting on this item during the Onsite Review reported that multiple placements occur less frequently than in years past. Stakeholders in Bradley County contribute the decrease in moves to the increased number of foster parents, better training for the foster parents, and more respite services. Bradley County stakeholders reported that the placement changes that do occur are justified or due to treatment needs. Stakeholders reported that the evaluation process for moving children to different levels of treatment is very structured in order to reduce the trauma of unnecessary moves. There are, however, instances when providers ask children to be moved due to the child's behavior. Stakeholders also reported that the decision to place a child and move a child is a team decision that includes input from the parents and the child. Stakeholders in Bradley County and Shelby County reported that cross-functional teams meet to resolve issues when a child's placement is at risk of disruption.

Stakeholders in the review sites reported that caseworkers carefully consider the best placement for the child. Stakeholders in Putnam County and Shelby County also reported fewer placement changes when children are placed with relatives than when they are in other types of placements. Stakeholders reported that maintaining placements depends on the child as children with behavior issues tend to change placements more frequently.

Shelby County stakeholders reported that TN Kids can be used to match children to the best placement by entering the child's information into the system, which in turns locates a resource family who can best meet the child's identified needs. Stakeholders in Putnam County said that the Unified Placement Process (UPP) assists staff with engaging community providers in assuring the first placement is the best placement.

Item 7. Permanency goal for child

 Strength **X** Area Needing Improvement

Case Review Findings

All 40 foster care cases were applicable for an assessment of item 7. In assessing this item, reviewers were to determine whether the agency had established a permanency goal for the child in a timely manner and whether the most current permanency goal was appropriate. Reviewers also were to determine whether the agency had sought termination of parental rights (TPR) in accordance with the requirements of the Adoption and Safe Families Act (ASFA).

Item 7	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	3	5	9	17	42.5
Area Needing Improvement	7	5	11	23	57.5
Total Applicable Foster Care Cases	10	10	20	40	
Not Applicable Foster Care Cases	0	0	0	0	

The item was rated as a Strength in 50 percent of Putnam County cases, 45 percent of Shelby County cases, and 30 percent of Bradley County cases.

Item 7 was rated as a Strength in 17 cases when reviewers determined that the child’s permanency goal was appropriate and had been established in a timely manner and that, where applicable, ASFA requirements with regard to seeking TPR had been met. The item was rated as an ANI in 23 cases when reviewers determined one or more of the following:

- The child’s current permanency goal was not appropriate given the case situation and the needs of the child (10 cases).
- The child’s permanency goal was not established in a timely manner (15 cases).
- A TPR petition was not filed in accordance with ASFA guidelines, and no compelling reasons were documented (10 cases).

Case review findings pertaining to case plan goals were as follows:

- 19 children had a single goal of adoption.
- 9 children had a single goal of reunification (including reunification with relatives).
- 6 children had concurrent goals of reunification with parents and adoption.

- 4 children had concurrent goals of reunification with parents and reunification with relatives.
- 2 children had concurrent goals of adoption and reunification with relatives.

Case review findings pertaining to TPR were as follows:

- At the time of the onsite CFSR, 28 of the 40 children in the foster care cases had been in foster care for 15 of the most recent 22 months.
- ASFA requirements were met in 18 (64 percent) of the 28 cases for which the requirements were applicable.

Rating Determination

Item 7 was assigned an overall rating of ANI. Reviewers determined that the agency had established an appropriate permanency goal for the child in a timely manner and met ASFA requirements in only 42.5 percent of the cases. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Performance on the Individual Measures Included in Composite 3: Permanency for children in foster care for extended time periods

The data below are presented to provide additional information about achieving permanency for children in foster care for extended time periods. There are no national standards for the individual measures included in Composite 3. National standards have been established only for the scaled composite scores for Composite 3. The State's performance on Composite 3 is shown in the table for Permanency Outcome 1.

Tennessee's performance on the individual measures included in Permanency Composite 3 (Achieving permanency for children in foster care for extended time periods) is as follows:

- 40 percent of the children in foster care for 24 months or longer at the start of the 12-month CFSR target period for the data indicators were discharged from foster care to a permanent home (i.e., adoption, reunification with parents or other relatives, or guardianship) by the end of the target period. This percentage exceeds the national 75th percentile for this measure of 29.1 percent.
- 93.1 percent of the children exiting foster care during the CFSR 12-month target period who were legally free for adoption at the time of exit were discharged to a permanent home. This percentage is less than the national median for this measure of 96.8 percent.
- 20.1 percent of the children who were discharged from foster care during the 12-month target period with a discharge reason of emancipation had been in foster care for 3 years or longer at the time of discharge. This percentage is less than the national 25th percentile of 37.5. For this measure, lower scores indicate more positive performance.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that the initial permanency plan be established during the CFTM held within the first 30 days of the child entering foster care. Within 60 days of the date of custody, the completed permanency plan is to be submitted to the court for approval. All permanency plans are reviewed by regional teams at a minimum at the 6- and 9-month custody points. Permanency plans and their goals also are reviewed by Foster Care Review Boards (FCRB) or the court at least every 6 months to determine the progress of the parents, the appropriateness of services provided by DCS, and the permanency plan goal. DCS policy allows for the establishment of concurrent goals when appropriate.

In November 2006, the department began monthly reviews of children who have been in foster care for 15 of the past 22 months without a TPR filed. Through this review process, the department has reduced the number of children in custody over 15 months without TPR from more than 2,000 to fewer than 500. The department also conducts backlog reviews of children in foster care at three benchmark points: 6 to 9 months, 9 to 12 months, and over 12 months without TPR. The reviews allow DCS to identify cases in which TPR is likely and ensure sound casework practices are being followed when a case plan has concurrent permanency goals. As reported in the Statewide Assessment, regular reviews have assisted in moving the cases to permanency.

Stakeholder Interview Information

Some stakeholders at the three review sites commenting on this item during the Onsite Review reported that DCS establishes initial permanency goals in a timely manner and reviews the goal every 3 months. Putnam County and Shelby County stakeholders reported that DCS is effective in selecting the appropriate goal for children and that the goal for each child is decided through the CFTM process. Additionally, these counties' stakeholders reported that when the circumstance of the case warrant it, the goal will be changed in a timely manner. However, some Putnam County stakeholders reported that there are times that reunification remains the goal for longer than it should and children are reunited with parents after 3 or 4 years in foster care. According to Bradley County stakeholders, the legal department must approve goal changes to adoption and permanent guardianship

Stakeholders at the three review sites and at the State level reported that the agency does use concurrent goals. Putnam County and Shelby County stakeholders reported that concurrent goals are generally established at the 6-month mark. State-level stakeholders reported there is no clear evidence that the concurrent goal is being pursued.

Putnam County stakeholders reported that establishing a permanency goal for teenagers often is difficult. Shelby County stakeholders reported that older youth have input into their permanency goal. Putnam County stakeholders reported that the court and DCS recognize the need for flexibility for this population.

State-level stakeholders commenting on this item during the onsite CFSR expressed the opinion that caseworkers do not always thoroughly assist the family with achieving permanency, which results in TPR not being justified. Additionally, these stakeholders reported that the quality of judges affects achieving permanency for children.

Additional information concerning TPR is provided under item 28 in the Systemic Factors Section of this report.

Item 8. Reunification, guardianship, or permanent placement with relatives

 Strength X Area Needing Improvement

Case Review Findings

Item 8 was applicable for 21 (52.5 percent) of the 40 foster care cases. In assessing these cases, reviewers were to determine whether the agency had achieved the permanency goals of reunification, guardianship, or permanent placement with relatives in a timely manner or, if the goals had not been achieved, reviewers were to determine whether the agency had made, or was in the process of making, diligent efforts to achieve the goals. Results of this assessment are shown in the table below.

Item 8	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	1	2	6	9	43
Area Needing Improvement	3	3	6	12	57
Total Applicable Foster Care Cases	4	5	12	21	
Not Applicable Foster Care Cases	6	5	8	19	
Total Foster Care Cases	10	10	20	40	

This item was rated as a Strength in 50 percent of applicable Shelby County cases, 40 percent of applicable Putnam County cases, and 25 percent of applicable Bradley County cases. Item 8 was rated as a Strength when reviewers determined that the goal had been achieved in a timely manner or that the agency was making concerted efforts to achieve the goal in a timely manner (nine cases). Item 8 was rated as an ANI in 12 cases when reviewers determined that the agency had not made diligent efforts to achieve the goal in a timely manner. There were no clear trends in these cases regarding reasons for delays in achieving this goal in a timely manner.

Rating Determination

Item 8 was assigned an overall rating of ANI. Reviewers determined that the agency had made diligent efforts to attain the goals of reunification, permanent placement with relatives, or guardianship in a timely manner in 43 percent of the 21 applicable cases. This percentage is less than the 90 percent required for a rating of Strength.

Performance on the Individual Measures Pertaining to Timeliness Included in Composite 1:

Timeliness and permanency of reunification

The data below are presented to provide additional information about the timeliness of reunification. There are no national standards for the individual measures included in Composite 1. National standards have been established only for the scaled composite score for Composite 1. The State's performance on Composite 1 is shown in the table for Permanency Outcome 1.

Tennessee's performance for the 12-month CFSR target period on the three "timeliness" measures included in Permanency Composite 1 (Timeliness and permanency of reunification) is presented below.

- 71.2 percent of the reunifications occurred in less than 12 months of the child's entry into foster care. This percentage is higher than the national median of 69.9 percent but less than the national 75th percentile of 75.2 percent.
- The median length of stay in Tennessee foster care for children discharged to reunification was 7.6 months. This length of stay exceeds the national median of 6.5 months. Note that a lower number of months indicates higher performance.
- 55.4 percent of children entering foster care in the last 6 months prior to the 12-month target period were discharged from foster care to reunification in less than 12 months of entry into foster care. This percentage is higher than the national 75th percentile of 48.4 percent.

Statewide Assessment Information

According to the Statewide Assessment, every effort is made to return children safely home. The preferred goal for children in DCS custody is reunification, if the conditions that led to the child's removal can be remedied and it is safe for the child to return home. If the child is unable to return to his/her parents, then efforts are made to achieve permanency through a legal relationship with a relative or other person with a significant relationship with the child. If reunification is not appropriate and all efforts have been made to reunify the child and parents, the goal of permanent guardianship can be used.

DCS has received the Federal Waiver Demonstration Project to establish a subsidized permanent guardianship program in Tennessee. The Subsidized Guardianship Pilot Initiative began in December 2006. The initiative provides subsidies to identified relative and kinship caregivers in the pilot areas. The State has used information from the pilot regions to determine whether

subsidizing guardianship will result in an increase in permanency and in safety for children, reduce the length of stay in foster care, and improve stability of family care. The goal of subsidized permanent guardianship is identified in TN Kids as OPPLA. Efforts in the State under the Federal IV-E waiver for subsidized guardianship have yielded 203 exits to permanency with relative and fictive kin from January 2007 through April 2008.

Stakeholder Interview Information

Stakeholders in Bradley County and Putnam County commenting on this item during the onsite CFSR expressed the opinion that services are being provided to assist families in achieving their goals. Shelby County stakeholders reported that DCS makes efforts to work with both the mother and father. Additionally, Shelby County stakeholders reported diligent searches for absent parents and relatives begin during the CPS process.

Stakeholders in Bradley County and Putnam County commenting on this item during the onsite CFSR expressed the opinion that since the introduction of subsidized guardianship as a permanency option there has been an increase in the use of relatives to achieve permanency. Putnam County stakeholders reported that subsidized guardianship has helped stabilize relative placements. Shelby County stakeholders reported the use of kinship placements but expressed the opinion that these placements do not occur often enough. Additionally, relatives are not always informed of the permanent guardianship or the subsidized guardianship waiver options.

Stakeholders at the State level reported that in the 18 months prior to the Onsite Review, approximately 235 children exited foster care to subsidized guardianship.

Item 9. Adoption

Strength **Area Needing Improvement**

Case Review Findings

Item 9 was applicable for 27 (67.5 percent) of the 40 foster care cases. In assessing this item, reviewers were to determine whether diligent efforts had been, or were being made, to achieve finalized adoptions in a timely manner. The results of this assessment are shown in the table below.

Item 9	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	2	2	6	10	37
Area Needing Improvement	6	5	6	17	63
Total Applicable Foster Care Cases	8	7	12	27	
Not Applicable Foster Care Cases	2	3	8	13	
Total Foster Care Cases	10	10	20	40	

This item was rated as a Strength in 50 percent of applicable Shelby County Cases, 29 percent of applicable Putnam County cases, and 25 percent of applicable Bradley County cases.

Item 9 was rated as a Strength in 10 cases when reviewers determined that the State had made diligent efforts to achieve finalized adoptions in a timely manner. Item 9 was rated as an ANI in 17 cases when reviewers determined one or more of the following:

- The adoption was delayed because of frequent continuances granted by the courts and the TPR appeals process (one case).
- The adoption was delayed due to the agency not filing for TPR in accordance with ASFA requirements (eight cases).
- The adoption was delayed due to the need to make a decision regarding the separation of siblings (one case).
- There was a lack of concerted efforts by the agency to seek an adoptive family for the child (eight cases).
- Delays were caused by the ICPC process (two cases).
- Adoption was the concurrent plan, and it was not pursued (one case).
- Services to preserve adoptive placement were not provided by the agency (two cases).
- The child did not want to be adopted; however, the goal remained adoption (five cases).

An additional finding relevant to this item was that adoption was finalized during the period under review in 7 of the 27 applicable cases. In one case, the adoption was finalized 20 months after the child's entry into foster care, but in three cases, the child had been in foster care for 56 months or longer at the time of finalization.

Rating Determination

Item 9 was assigned an overall rating of ANI. Reviewers determined that the agency had made concerted efforts to achieve a finalized adoption in a timely manner in 37 percent of the applicable cases. This percentage is less than the 90 percent required for a rating of Strength. This item was rated as an ANI in the State's 2002 CFSR.

Performance on the Individual Measures Included in Composite 2: Timeliness of adoptions

The data below are presented to provide additional information about the timeliness of adoptions. There are no national standards for the individual measures included in Composite 2. National standards have been established only for the scaled composite score for Composite 2. The State's performance on Composite 2 is shown in the table for Permanency Outcome 1.

Tennessee's performance during the CFSR 12-month target period on the individual measures included in Permanency Composite 2 (Timeliness of adoptions) is as follows:

- 29.8 percent of the children exiting to adoption were discharged in less than 24 months from the time of entry into foster care. This percentage exceeds the national median of 26.8 percent but is less than the national 75th percentile of 36.6 percent.
- The median length of stay in foster care for children adopted was 30.8 months. This length of stay is less than the national median of 32.4 months but higher than the national 25th percentile of 27.3 months. Note that a lower number of months equates to a higher level of performance.
- 32.2 percent of children in foster care for 17 months or longer on the first day of the CFSR 12-month target period were discharged to a final adoption by the last day of the target period. This percentage exceeds the national 75th percentile of 22.7 percent.
- 17.5 percent of children in foster care for 17 months or longer on the first day of the CFSR 12-month target period became legally free for adoption (i.e., there was a TPR for both the mother and father) within 6 months. This percent exceeds the national 75th percentile of 10.9 percent.
- 69.2 percent of children who were legally free for adoption were adopted within 12 months of becoming legally free. This percent exceeds the national 75th percentile of 53.7 percent.

Statewide Assessment Information

As reported in the Statewide Assessment, Tennessee completed 1,216 adoptions in the last Federal FY. At the time that the Statewide Assessment was being prepared, adoption was the established permanency goal for 20.5 percent of the children in foster care.

The Statewide Assessment reports that, according to the February 2008 Brian A. Monthly Summary Report, DCS filed for TPR within 90 days for 81.7 percent of children who had the goal of adoption established for more than 3 months during the reporting period. Additionally, data indicate that of the children for whom TPR occurred during the reporting period, 73 percent

had their adoptions finalized or permanent guardianship transferred within 12 months of being in full guardianship. According to the most recent Brian A. outcome data, the statewide percentage of children with sole goals of adoption who had TPR activity within 3 months of the goal change was 82.9 percent. Of the remaining children, 61.5 percent had TPR activity within 6 months.

According to the Statewide Assessment, DCS policy requires that a CFTM be held at least every 3 months to determine if it is in the child's best interests to pursue a goal of adoption. If the team agrees upon a goal of adoption, DCS is mandated to continue to ensure and document that reasonable efforts are made to return the child/youth to the parent or caregivers until TPR occurs.

Once the goal of adoption is approved by the CFTM, the Permanency Specialist immediately registers the child on the REACT (Resource Exchange for Adoptable Children in Tennessee) database. All children who are in State guardianship or have the goal of adoption must be registered and maintained in current status in REACT. REACT data provides Permanency Specialists and private provider staff with information necessary to identify families most suitable to meet the needs of children in need of permanent families. From the point of a child's entry in the REACT system, the child's progress toward permanency is tracked until a permanent placement is found.

According to DCS policy, when the permanency goal for a child changes to adoption, including as a concurrent goal, the caseworker is to discuss adoption with the current resource family. According to the Statewide Assessment, resource parent involvement in the CFT often means that pre-adoptive homes can be identified early in the case. If a child has been in custody for 12 months with a goal of adoption or a concurrent goal of adoption and the current resource family is not willing or appropriate to adopt, or the child is in a congregate care setting and no adoptive placement has been identified, the Brian A. Settlement Agreement requires that DCS convene a CFTM to establish an Individualized Recruitment Plan (IRP).

If an adoptive resource has not been identified within 60 days of the TPR, the CFT is to submit an updated IRP to the Finding Our Children Unconditional Supports (FOCUS) Team. The FOCUS Team reviews the IRP, ensures that timeframes, roles, and responsibilities are set forth in the plan, and ensures that the child is registered on both REACT and AdoptUsKids. The FOCUS Team also assists with conducting archeological digs, family searches, interviews, and building a permanency-focused CFT. FOCUS teams have been implemented statewide, and more than 300 children have been served as of March 1, 2008. Harmony Adoption Services (Harmony) documents case referrals and tracks and reports on actions taken by the FOCUS teams.

Stakeholder Interview Information

Some stakeholders in Bradley County who commented on this item during the Onsite Review expressed the opinion that the State has made progress in moving cases to adoption. However, other stakeholders in Bradley County reported that there is a

large amount of time between filing for TPR and the granting of the TPR. Stakeholders in the county reported that DCS had been filing in Circuit Court in hopes of expediting the TPR process; however, the judge granted continuances that caused delays in achieving TPR. Bradley County currently files for TPR in Juvenile Court. However, only a half a day a week is designated for dependency cases, which can result in a TPR proceeding occurring over several months. Stakeholders in Bradley County expressed the opinion that there is a need for an additional juvenile court judge or referee. Stakeholders in Bradley County did report that the judge generally makes a TPR decision immediately upon completion of the trial. Bradley County stakeholders reported that locating an adoptive resource and the 6-month supervision period may delay the timely achievement of adoption.

Shelby County stakeholders acknowledged that achieving adoption is a timely process. According to these stakeholders, it may take 3 to 6 months for a TPR to be placed on the court schedule. Once on the court schedule, the case may be continued for various reasons including failure of DCS to meet publication requirements or the parents not having legal representation.

Putnam County stakeholders reported that effective July 1, 2008, new legislation allows for an interlocutory appeal if a TPR case is not heard in 6 months of the filing of the TPR petition.

Stakeholders in the three review sites reported that parents do file appeals to TPR decisions. However, Bradley County stakeholders reported that none of their TPRs have been overturned. Shelby County stakeholders reported if appeals occur, the adoption will be delayed; however, once the appeal is denied, the adoption occurs quickly.

According to Bradley County stakeholders, foster parent adoptions go quickly. However, Putnam County stakeholders reported that sometimes private attorneys do not see the urgency in establishing permanency, which causes delays in foster parent adoptions. These stakeholders indicated that as a result of training for the attorneys conducted by the Court Improvement Program (CIP), they have seen improvement in this area.

Shelby County stakeholders reported the CFTM process is utilized to identify adoptive families for children. The FOCUS Team recruits families for children who it is difficult to find placement. Shelby County stakeholders reported that it is more difficult to find adoptive homes for older children due to behavior issues. Additionally, many older youth do not want to be adopted and neither DCS nor the court can compel them to do so.

Putnam County stakeholders indicated that although adoption subsidy is available, DCS is inconsistent in discussing it with adoptive parents. Adoption assistance, according to stakeholders, is renewed annually by the family providing documentation

that the child is still engaged in services and is still in the home. If the family does not provide verification, the subsidy can be suspended, but an extension can be granted (at a lower rate) until the documentation is obtained.

Putnam County stakeholders reported that the Adoption Support and Preservation Program conducts pre-adoption counseling to help prepare children and families for the adoption process.

Item 10. Other planned permanent living arrangement

Case Review Findings

Item 10 was not applicable for any of the 40 foster care cases reviewed because no child had a goal of OPPLA.

Statewide Assessment Information

According to the Statewide Assessment, DCS has established a process for review and approval of OPPLA as an appropriate permanency goal. That process has led to a decrease in the number of children with a goal of OPPLA. DCS no longer recognizes emancipation as a permanency goal because DCS believes that every child deserves a connection to a permanent family. No child can be assigned a permanency goal of OPPLA without written approval by the commissioner or her designee, the Assistant Director of Permanency Planning. The conditions under which OPPLA can be identified as a permanency goal for youth in Tennessee are:

- The department has made reasonable and appropriate efforts to return the child to the child's parents, to place the child with appropriate family members, or to place the child for adoption and has been unable to do so.
- The person to whom the department proposes to assign permanent caregiver status has demonstrated a commitment to assuming long-term responsibility for the child.
- The person to whom the department proposes to assign permanent caregiver status has been fully informed about the options of adoption and, if applicable, permanent guardianship, and expresses a reasoned judgment for not pursuing adoption or permanent guardianship.
- It is in the best interests of the child to remain in the home of the proposed permanent caregiver rather than to be considered for adoption by another person.
- The CFT has carefully considered all of the permanency options for this child and recommended OPPLA as a sole or concurrent goal.
- Approval for the goal of OPPLA has been requested and granted by the commissioner or her designee in the Central Office.

According to the Statewide Assessment, local courts do not always uphold the agency’s limited use of OPPLA. Often, courts will disregard DCS’s work with the CFT in setting goals by superimposing the use of OPPLA goal, particularly for older youth.

Stakeholder Interview Information

According to stakeholders at the three review sites and the State level commenting on this item during the onsite CFSR, OPPLA is rarely used as a permanency goal. However, according to stakeholders in Putnam County, OPPLA would at times be the appropriate goal for some youth. Shelby County stakeholders reported that when the OPPLA is used, the youth has not been adequately prepared or educated on services available to him or her.

Permanency Outcome 2

Outcome P2: The continuity of family relationships and connections is preserved for children					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	4	7	12	23	57.5
Partially Achieved	5	3	8	16	40.0
Not Achieved or Addressed	1	0	0	1	2.5
Total Applicable Foster Care Cases	10	10	20	40	
Not Applicable Foster Care Cases	0	0	0	0	

Status of Permanency Outcome 2

Tennessee is not in substantial conformity with Permanency Outcome 2. The outcome was rated as substantially achieved in 57.5 percent of the cases, which is less than the 95 percent required for substantial conformity. The outcome was determined to be substantially achieved in 70 percent of applicable Putnam County cases, applicable 60 percent of Shelby County cases, and 40 percent of applicable Bradley County cases. Tennessee was not in substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The following concerns were identified in the 2002 CFSR:

- DCS was not consistently effective in placing siblings together.
- There were inconsistencies in practice with regard to facilitating or promoting visitation with parents and siblings in foster care and preserving children’s connections.
- Relatives were not being sought as potential placement resources.
- Agency practice was not consistent with regard to promoting or maintaining the relationship between children and their parents.

To address these concerns, Tennessee implemented the following strategies in its PIP:

- The State studied and developed recommendations to implement subsidized guardianship.
- Contracted therapeutic visitation services were made available.
- The State developed and implemented statewide policies to support children placed with kin.
- The State developed and provided information regarding available support services and provided this information to families served by DCS.
- The State implemented a statewide relative caregiver program.

Tennessee met its goals for this outcome by the end of the PIP period.

Key Findings of the 2008 CFSR

The findings pertaining to the specific items assessed under Permanency Outcome 2 during the 2008 CFSR are presented and discussed below.

Item 11. Proximity of foster care placement

 X **Strength** **Area Needing Improvement**

Case Review Findings

Item 11 was applicable for 29 (72.5 percent) of the 40 foster care cases. Cases determined to be not applicable were those in which (1) TPR had been attained prior to the period under review, (2) contact with parents was not considered to be in the child’s best interests, and/or (3) parents were deceased or their whereabouts were unknown. In assessing item 11, reviewers were to determine whether the child’s most current foster care setting was in close proximity to the child’s parents or close relatives. The results of this assessment are presented in the table below.

Item 11	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	4	8	16	28	97
Area Needing Improvement	1	0	0	1	3
Total Applicable Foster Care Cases	5	8	16	29	
Not Applicable Foster Care Cases	5	2	4	11	
Total Foster Care Cases	10	10	20	40	

This item was rated as a Strength in 100 percent of applicable Putnam County and Shelby County cases and 80 percent of applicable Bradley County cases.

Item 11 was rated as a Strength when reviewers determined that the child was placed in the same community or county as the parents or that the child’s placement was not in the same community or county, but was still in close proximity to the parents (26 cases). The item also was rated as a Strength if the child was placed out of his or her community or county, but that the placement was necessary to meet the needs of the child and/or support attainment of the permanency goal (two cases). This item was rated as an ANI in one case when the distance between the child’s family and the foster care placement was determined to be a barrier to reunification efforts and unnecessary to meet the child’s needs.

Rating Determination

Item 11 was assigned an overall rating of Strength. In 97 percent of the cases, reviewers determined that DCS had made diligent efforts to ensure that children were placed in foster care placements that were in close proximity to their parents or relatives or that were necessary to meet special needs. This percentage is higher than the 90 percent required for a rating of Strength. This item also was rated as a Strength in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that children be placed within their home regions or within 75 miles of their homes of origins. Placement outside the child’s home region requires the approval of the regional administrator.

According to the February 2008 Brian A. Settlement Agreement mid-month report reported in the Statewide Assessment, 90.4 percent of children adjudicated dependent/neglected and/or unruly were placed within 75 miles of their home. As reported in the Statewide Assessment, as of December 31, 2008, there were only 177 (2.05 percent) children placed outside of the State borders, and 55 of those children were placed on trial home visits or in in-home placements.

As reported in the Statewide Assessment, barriers for Tennessee are the development and distribution of placement resources in the State to match the location and needs of children. Much of the State's resource home development has been based on the interest of a family in partnering with DCS or contract agency, rather than an analysis of child specific needs followed by targeted recruitment. As a result, matching the needs of a child with the strengths of the resource home can conflict with placement in a child's own community. Additionally, congregate care facilities and specialized programs are clustered in the urban and surrounding areas, making it a struggle for rural regions to keep children close to home when they require congregate care or certain specialized programs.

Stakeholder Interview Information

Stakeholders in Putnam County commenting on this item during the onsite CFSR expressed the opinion that DCS caseworkers place children in close proximity to their families. Bradley County stakeholders reported concern that delinquent boys are frequently placed outside the county. Additionally, Bradley County stakeholders expressed the opinion that when placements occur outside the county, it affects the reunification process.

Shelby County stakeholders reported children are placed out of the county when they are chronic runaways or need specialized treatment that is not available in their county of residence, and that sometimes children are placed out of their county of origin if there is a lack of foster home placements in that county.

Item 12. Placement with siblings

 X Strength Area Needing Improvement

Case Review Findings

Item 12 was applicable for 22 (55 percent) of the 40 foster care cases. Cases were not applicable if the child did not have a sibling in foster care at any time during the period under review. In assessing item 12, reviewers were to determine whether siblings were, or had been, placed together and, if not, whether the separation was necessary to meet the needs (service or safety needs) of one or more of the children. The results of this assessment are presented in the table below.

Item 12	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	5	5	10	20	91
Area Needing Improvement	0	0	2	2	9
Total Applicable Foster Care Cases	5	5	12	22	
Not Applicable Foster Care Cases	5	5	8	18	
Total Foster Care Cases	10	10	20	40	

The item was determined to be substantially achieved in 100 percent of applicable Bradley County and Putnam County cases and 83 percent of applicable Shelby County cases.

Item 12 was rated as a Strength in 20 cases when reviewers determined that the child was placed with siblings or, if the child was not placed with siblings, the separation was in the best interests of the child or was necessary because one of the siblings had special placement needs. Item 12 was rated as an ANI in two cases when reviewers determined DCS had not made sufficient efforts to locate a placement for a sibling group when it was appropriate for the group to be placed together.

Rating Determination

Item 12 was assigned an overall rating of Strength. In 91 percent of the applicable cases, reviewers determined that the agency placed siblings together in foster care whenever possible and appropriate. This percentage is higher than the 90 percent required for a rating of Strength. This item was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS makes every effort to place siblings together. Additionally, DCS thoroughly explores relatives and kin resources to enhance the opportunity of placing siblings together. However, the Statewide Assessment also notes that there are barriers to placing siblings together, including a scarcity of resource homes that will accept sibling groups of three or more and of resource homes that will accept sibling groups that include teenagers. According to the Statewide Assessment, the implementation of the MRS, UPP, and the CFT process are all efforts aimed at increasing the number and proportion of children and youth who are placed with their own siblings while in State custody.

The Resource Home Availability Report in TN Kids identifies resource homes available within each region and identifies available placements within the resource home for sibling groups. As reported in the Statewide Assessment, since 2003, the number of siblings placed together has been at 83 percent or higher each year.

Stakeholder Interview Information

Most stakeholders commenting on this item during the onsite CFSR expressed the opinion that diligent efforts are made to place siblings together unless it is therapeutically in the best interests to separate the children. However, some stakeholders reported that occasionally the size of the sibling group or the lack of resources will pose a barrier to sibling placement.

Item 13. Visiting with parents and siblings in foster care

Strength Area Needing Improvement

Case Review Findings

Item 13 was applicable for 31 (77.5 percent) of the 40 foster care cases. Cases were not applicable for an assessment of this item if the child had no siblings in foster care and if one of the following conditions were met with regard to the parents: (1) TPR was established prior to the period under review and parents were no longer involved in the child's life (or parents were deceased), or (2) visitation with a parent was considered to not be in the best interests of the child. In assessing this item, reviewers were to determine (1) whether the agency had made, or was making, diligent efforts to facilitate visitation between children in foster care and their parents and siblings in foster care and (2) whether these visits occurred with sufficient frequency to meet the needs of children and families. The findings of this assessment are presented in the table below.

Item 13	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	5	7	9	21	68
Area Needing Improvement	2	2	6	10	32
Total Applicable Foster Care Cases	7	9	15	31	
Not Applicable Foster Care Cases	3	1	5	9	
Total Foster Care Cases	10	10	20	40	

Item 13 was rated as a Strength in 78 percent of applicable Putnam County cases, 71 percent of applicable Bradley County cases, and 60 percent of applicable Shelby County cases.

Item 13 was rated as a Strength in 21 cases when reviewers determined that the frequency and quality of visitation with parents and siblings met the needs of the children. Item 13 was rated as an ANI in 10 cases when reviewers determined the agency did not make concerted efforts to promote visitation with mothers, siblings, and/or fathers.

Specific findings with regard to the frequency of visitation with mothers, fathers, and siblings are provided in the table below.

Visitation frequency for children in foster care (during the period under review)	Mother	Father	Siblings in Foster Care
Visits occurred at least once a week	8 (31%)	0 (0%)	0 (0%)
Visits occurred less frequently than once a week but at least twice a month	7 (27%)	4 (25%)	6 (60%)
Visits occurred less frequently than twice a month but at least once a month	7 (27%)	1 (6%)	3 (30%)
Visits occurred less frequently than once a month	1 (4%)	4 (25%)	1 (10%)
Visits did not occur	3 (11%)	7 (44%)	0
Total Applicable Cases	26	16	10

Rating Determination

Item 13 was assigned an overall rating of ANI. In 68 percent of the applicable cases, reviewers determined that the agency made concerted efforts to ensure that visitation was of sufficient frequency to meet the needs of the family. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that any children or youth, regardless of adjudication, who are in the legal custody of DCS should have the opportunity to visit their families and/or siblings unless there is a court order that limits such visitation or it is not in the best interests of the child. Visitation with removal parents or caregivers is required to occur no less than 4 hours every month. According to the Statewide Assessment, although there has been an increase in visits between parents and children, most parents only receive the minimum required visitation. Visitation between siblings placed separately is required to occur no less than 1 hour per month. However, policy recognizes that visits may need to occur more frequently to support the siblings’ relationship. For siblings placed separately in foster care, DCS encourages and facilitates a relationship between the resource home placements so they may coordinate the siblings’ visitation schedule.

Whenever children are not placed together, a plan for visitation between siblings is developed at the initial CFTM and documented in the case file. DCS policy outlines that sibling visitation should occur in the most home-like setting as frequently as necessary to preserve the ongoing relationship of the children but no less frequently than once a month. If this visitation is contrary to treatment, best interests of the children, or restricted by the court, this information will be documented in the case file.

As reported in the Statewide Assessment, TN Kids reporting documentation indicates that practice is improving with regard to both parent-child visitation and sibling visitation. It was noted that documented family (parent) visitation occurring twice per month increased from 17.1 percent in December 2006 to 22.3 percent in September 2007. It also was noted that siblings not placed together make up 19.52 percent of the children in foster care, and their monthly visitation rates were only 44.76 percent in July 2007. According to the Statewide Assessment, visitation may be underreported in the TN Kids system.

The QSR process assesses visitation and other means of supporting family relationships with parents, siblings, and extended family in the Family Connections indicator. According to the Statewide Assessment, reviews completed for QSR Year 3 found that 39 percent of cases were rated as acceptable.

Barriers to frequent visitation that were reported in the Statewide Assessment include the following:

- Limited engagement with fathers and noncustodial mothers
- Unknown whereabouts of absent parents
- Children with high-level needs placed far away from parents and siblings (although regions have access to funds for transportation assistance to families, including payment for gas, public transportation tickets, hotels, and food when children are placed far from their homes)

Stakeholder Interview Information

Most stakeholders commenting on this item during the onsite CFSR expressed the opinion that DCS meets the minimum standards for parental visitation. Additionally, most stakeholders reported that sibling visitation is occurring.

Shelby County stakeholders reported that therapeutic visitation centers are used for some parent/child visitation. During these visits, caseworkers work with the parents and then debrief with the parents after the visitation session. Shelby County stakeholders also reported that visitation increases as the family progresses toward reunification.

Item 14. Preserving connections

 Strength X Area Needing Improvement

Case Review Findings

Item 14 was applicable for 39 (97.5 percent) of the 40 foster care cases. In assessing item 14, reviewers were to determine whether the agency had made, or was making, diligent efforts to preserve the child's connections to neighborhood, community,

heritage, extended family, faith, and friends while the child was in foster care. This item is not rated on the basis of visits or contacts with parents or siblings in foster care. The results of the assessment are provided in the table below.

Item 14	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	7	9	17	33	85
Area Needing Improvement	3	1	2	6	15
Total Applicable Foster Care Cases	10	10	19	39	
Not Applicable Foster Care Cases	0	0	1	1	
Total Foster Care Cases	10	10	20	40	

Item 14 was rated as a Strength in 90 percent of applicable Putnam County cases, 89 percent of applicable Shelby County cases, and 70 percent of applicable Bradley County cases.

Item 14 was rated as a Strength when reviewers determined one or more of the following:

- The agency made concerted efforts to preserve the child’s connections with extended family members (through phone contacts, visits, and/or placements with relatives) (27 cases).
- The agency made concerted efforts to preserve the child’s connections with the child’s religious or cultural heritage (three cases).
- The agency made concerted efforts to preserve the child’s connections with the school, community, and important activities such as dance classes or sports (e.g. selecting placements that do not require a change of school, jobs, sports teams, etc.) (10 cases).
- The agency ensured that the child’s connection to previous service providers was preserved (four cases).

Item 14 was rated as an ANI when reviewers determined the following:

- The agency did not make concerted efforts to maintain the child’s connections to extended family (four cases).
- The agency did not make concerted efforts to preserve the child’s connections to school or community (two cases).

Rating Determination

Item 14 was assigned an overall rating of ANI. In 85 percent of the cases, reviewers determined that the agency had made concerted efforts to maintain the child’s connections with extended family, culture, religion, community, and school. This

percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in Tennessee's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, when children are unable to remain within their own family and community, caseworkers are expected to develop plans to preserve the child's connections to family, community, faith, and culture while in placement. Some barriers to maintaining connections noted in the Statewide Assessment included the following:

- There are limited placement resources within rural areas so that children cannot always be placed in their same communities. Urban areas generally have a myriad of resources that allow for more support and opportunity for connections to families, neighborhood, community, faith, family, Tribe, school, and friends.
- There are missed opportunities for engaging with families so that family members can serve as supports.

Stakeholder Interview Information

Some stakeholders commenting on this item during the onsite CFSR reported that DCS makes every effort to maintain children in their schools. Additionally, stakeholders in Putnam County and Shelby County and at the State level reported that DCS makes efforts to maintain children's connections to their community, church, and to extended family.

Item 15. Relative placement

 Strength **X** Area Needing Improvement

Case Review Findings

Item 15 was applicable for 38 (95 percent) of the 40 foster care cases. Cases were not applicable if relative placement was not an option during the period under review because (1) the child was in an adoptive placement at the start of the time period, or (2) the child entered foster care needing specialized services that could not be provided in a relative placement. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to locate and assess relatives (both maternal and paternal relatives) as potential placement resources for children in foster care. The results of this assessment are presented in the table below.

Item 15	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	5	6	12	23	61
Area Needing Improvement	5	4	6	15	39
Total Applicable Foster Care Cases	10	10	18	38	
Not Applicable Foster Care Case	0	0	2	2	
Total Foster Care Cases	10	10	20	40	

Item 15 item was rated as a Strength in 67 percent of applicable Shelby County cases, 60 percent of applicable Putnam County cases, and 50 percent of applicable Bradley County cases.

Item 15 was rated as a Strength in 23 cases when reviewers determined the following:

- The child was placed with relatives or close family members (six cases).
- The child was not placed with relatives but the agency made diligent efforts to search for both maternal and paternal relatives when applicable (16 cases). In these cases, children were not placed with relatives because a relative could not be found or because identified relatives were unable or unwilling to care for the children and/or had a criminal record or history of substantiated child maltreatment.
- In one case, a relative had been identified as the placement resource for the child and was in the process of moving the child into the home at the time of the Onsite Review.

Item 15 was rated as an ANI when reviewers determined the following:

- The agency had not made diligent efforts to search for known maternal and paternal relatives during the period under review (nine cases).
- The agency made diligent efforts to search for maternal relatives, but not paternal relatives (three cases).
- The agency made diligent effort to search for paternal relatives, but not maternal relatives (two cases).
- The agency had not made diligent efforts to search for maternal relatives when a child was removed from a single adoptive parent (mother) (one case).

Rating Determination

Item 15 was assigned an overall rating of an ANI. In 61 percent of cases, reviewers determined that the agency had made diligent efforts to locate and assess relatives as potential placement resources. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, relatives and kin should be the priority placement for children and youth who have been removed from their own parents or caregivers. Relatives are defined by blood, marriage, or adoption and kin are persons with a significant relationship to the child (for example, a fellow church member, friend, godparent, minister, neighbor, or teacher). The identified relative/kin should be engaged in the CFT process in order to assist in making critical decisions regarding the child's placement and progress toward permanency.

Once a child is placed with relatives/kin through an expedited placement, DCS policy allows for an expedited placement following a satisfactory interview, home visit, reference, and records check. These relative/kin must become fully approved resource parents within 120 days of the child's placement. However, the Statewide Assessment reports that the statewide average for approving a relative/kin placement as a resource home is 208 days.

There is recognition, according to the Statewide Assessment, that outreach to relatives is not consistent and that communication issues and court decisions have been obstacles to increasing kinship resource homes.

Stakeholder Interview Information

Most stakeholders at the three review sites and the State level commenting on this item during the onsite CFSR expressed the opinion that DCS makes concerted efforts to seek relatives as potential placement resources. Stakeholders at the State level reported that one of the main goals of the pre-custody or initial CFTM is to identify relatives and that diligent searches and archeological digs are conducted to locate family and usually begin during the CPS process. Stakeholders at the State level indicated that even if relatives cannot provide full-time care, they are contacted to serve as permanent connections for the children.

Item 16. Relationship of child in care with parents

 Strength X Area Needing Improvement

Case Review Findings

Item 16 was applicable for 30 (75 percent) of the 40 foster care cases. Cases were not applicable if (1) parental rights had been terminated prior to the period under review and parents were no longer involved with the child, (2) a relationship with the parents was considered to be not in the child’s best interests throughout the period under review, or (3) both parents were deceased. In assessing this item, reviewers were to determine whether the agency had made diligent efforts to support or maintain the bond between children in foster care and their mothers and fathers through efforts other than arranging visitation. The results of this assessment are provided in the table below.

Item 16	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	3	6	4	13	43
Area Needing Improvement	3	3	11	17	57
Total Applicable Foster Care Cases	6	9	15	30	
Not Applicable Foster Care Cases	4	1	5	10	
Total Foster Care Cases	10	10	20	40	

Item 16 was rated as a Strength in 67 percent of applicable Putnam County cases, 50 percent of applicable Bradley County cases, and 27 percent of applicable Shelby County cases.

Item 16 was rated as a Strength when reviewers determined that the agency had made concerted efforts to support and/or strengthen the bond between parents and children through various activities. The table below identifies the activities as well as the number of cases relevant for each type of activity.

Effort Made	With Mother	With Father	Total
Encourage the parent's participation in school activities and case conferences, attendance at doctors' appointments with the child, or engagement in the child's after school or sports activities	11	4	15
Provide or arrange for transportation or provide funds for transportation so that the parent could attend the child's special activities and doctors' appointments	8	1	9
Provide opportunities for therapeutic situations to help the parent and child strengthen their relationship	13	5	18
Encourage the foster parents to provide mentoring or serve as role models to the parent to assist her/him in appropriate parenting	8	3	11
Encourage and facilitate contact with incarcerated parents (where appropriate) or with parents not living in close proximity to the child	1	0	1

Item 16 was rated as an ANI when reviewers determined the following:

- The agency did not make concerted efforts to support the child's relationship with the mother (five cases).
- The agency did not make concerted efforts to support the child's relationship with the father (nine cases).
- The agency did not make concerted efforts to support the child's relationship with either parent (three cases).

Rating Determination

Item 16 was assigned an overall rating of ANI. Reviewers determined that the agency had made concerted efforts to support the parent-child relationships of children in foster care in 43 percent of the cases. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS recognizes the importance of maintaining and promoting the relationships between parents and their children placed in foster care. According to the Statewide Assessment, birth parents and resource parents should be encouraged to partner in the parenting of the child. It was noted that the CFT process allows the parents to continue to be a part of the decision-making process for their child.

According to the Statewide Assessment, areas of the State have developed innovative supports to encourage the relationship of children with their families, including therapeutic visitation, supervised visitation, and transportation grants, which provide a stipend to volunteers and resource parents to transport children and/or parents to visits.

In addition to visitation, parents can attend doctor's appointments, school activities, and other activities with their children, when appropriate. Resource parents are encouraged to engage birth parents so that information about their children can be freely shared. Decisions about these types of contact are made by the CFT based on the individual circumstances of the case.

As indicated in the Statewide Assessment, the QSR rates the status of family connections for children in foster care. As reported in the Statewide Assessment, the most recent data from the QSR indicate that only 39 percent of the cases reviewed were rated as acceptable for this indicator.

As part of a needs assessment, DCS conducted focus group sessions with youth in foster care. According to the Statewide Assessment, "Several youth and former foster youth stated that the inability to maintain contact with birth families directly influenced their sense of well-being, their progress toward forming trusting relationships, and, in some incidences, had the effect of encouraging them to run from placements."

Stakeholder Interview Information

Stakeholders in Putnam County commenting on this item during the onsite CFSR reported that caseworkers are making a concerted effort to locate and/or engage fathers in the case process. Additionally, Putnam County stakeholders reported that visits are made to the jail and that CFTMs have occurred in the jail in order to engage the incarcerated parent. Shelby County stakeholders reported that parents can attend Individualized Education Program (IEP) meetings, medical appointments, and sporting events with their children. Bradley County stakeholders did not comment on this item.

III. CHILD AND FAMILY WELL-BEING

Well-Being Outcome 1

Outcome WB1: Families have enhanced capacity to provide for their children's needs					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	8	7	8	23	35.4
Partially Achieved	6	3	14	23	35.4
Not Achieved or Addressed	3	7	9	19	29.2
Total Applicable Cases	17	17	31	65	

Status of Well-Being Outcome 1

Tennessee is not in substantial conformity with Well-Being Outcome 1. The outcome was substantially achieved in only 35.4 percent of the cases reviewed, which is less than the 95 percent required for a determination of substantial conformity. The outcome was substantially achieved in only 47 percent of Bradley County cases, 41 percent of Putnam County cases, and 26 percent of Shelby County cases. The outcome was found to be substantially achieved in 52.5 percent (21 cases) of the 40 foster care cases and 8 percent (2 cases) of the 25 in-home services cases. Tennessee was not in substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The following key concerns were identified in the 2002 CFSR:

- Inadequacy of assessments, particularly with respect to identifying underlying problems such as substance abuse and sexual abuse
- Inconsistency in meeting children's and parent's service needs
- Lack of independent living (IL) services for children
- Lack of attention in some cases to the service needs of foster parents
- Lack of engagement/involvement with the family in case planning, particularly with fathers
- Lack of sufficient frequency and quality of caseworker visits with parents

To address these concerns, the State implemented the following strategies in its PIP:

- The State provided skills-based training statewide to teach family-centered casework and planning and also implemented regional plans for FTMs.
- The State developed and implemented a quality visitation process to facilitate attachment between parents and children and support placements.

The State met its target goals for this outcome by the end of the PIP implementation period.

Key Findings of the 2008 CFSR

The findings pertaining to the specific items assessed under Well-Being Outcome 1 during the 2008 CFSR are presented and discussed below.

Item 17. Needs and services of child, parents, foster parents

 Strength **X** Area Needing Improvement

Case Review Findings

Item 17 was applicable for all 65 cases. In assessing this item, reviewers were to determine whether the agency had (1) adequately assessed the needs of children, parents, and foster parents and (2) provided the services necessary to meet those needs. This item excludes the assessment of children’s (but not parents’) needs pertaining to educational, physical health, and mental health needs. These are addressed in later items. The results of this assessment are provided in the table below.

Item 17	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	10	7	8	25	38
Area Needing Improvement	7	10	23	40	62
Not Applicable	0	0	0	0	
Total Cases	17	17	31	65	

Item 17 was rated as a Strength in 59 percent of Bradley County cases, 41 percent of Putnam County cases, and 26 percent of Shelby County cases. The item was rated as a Strength in 52.5 percent (21 cases) of the 40 foster care cases and in 16 percent (4 cases) of the 25 in-home services cases.

Item 17 was rated as a Strength when reviewers determined that the needs of children, parents, and foster parents had been adequately assessed and that identified service needs had been met. Item 17 was rated as an ANI when reviewers determined that there was either inadequate assessment of needs or inadequate services to meet identified needs. Specific case review findings for item 17 are shown in the table below.

Target person for needs assessment and services	Foster Care		In-Home Services	
	Yes	Total	Yes	Total
Mother's needs assessed and met	18 (62%)	29	12 (48%)	25
Father's needs assessed and met	8 (40%)	20	5 (23%)	22
Child's needs assessed and met	34 (85%)	40	8 (32%)	25
Foster parents' needs assessed and met	33 (89%)	37		

Rating Determination

Item 17 was assigned an overall rating of an ANI. Reviewers determined that the State had adequately assessed and addressed the service needs of children, parents, and foster parents in only 38 percent of the cases. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS has updated and improved the assessment process for all families and children that it serves. DCS has implemented quantitative and qualitative assessments with a family focus for both noncustodial and custodial clients to collect the critical information, including strength and needs, for the provision of services. The following quantitative assessments are utilized by DCS:

- **SDM Child Abuse/Neglect Screening Criteria:** A tool used immediately upon receipt of a report of abuse/neglect to gather all available information to determine whether the report meets DCS criteria to initiate an investigation.
- **SDM Response Priority Decision Trees:** A tool used to determine how quickly face-to-face contact must be initiated for assigned investigations.
- **SDM Safety Assessment:** A tool to guide the decision to leave children in the home or protectively place children out of the home based on observed threats of immediate harm and the availability of interventions to mitigate safety concerns.
- **SDM Family Risk Assessment:** A tool to estimate the likelihood of future maltreatment. Guides the decision for whether or not to open a case for ongoing services.

- SDM Family Risk Reassessment (for nonprotective custody cases): A tool to guide the decision to close a case and, for cases that remain open, the minimum contact standards.
- Youth Level of Service (YLS)/Case Management Inventory (CMI): A tool to identify both risk and protective factors that are present in a child's life that either promote or prevent delinquent behavior.
- FAST: A family planning tool for understanding family circumstances and assisting in the development of noncustodial services.
- Child and Adolescent Needs and Strengths (CANS): A tool that provides a context for communicating and making decisions about care. It consists of approximately 65 items to evaluate how the department can best provide resources and services for the child and family.
- Ansell Casey Life Skills Assessment: An assessment for youth who are 14 years and older to identify barriers and needed skills to successfully function as young adults. The assessment results are useful for goal setting, program planning, and for measuring progress on life skill acquisition.
- Structured Analysis Family Evaluation: A tool designed to evaluate families for adoption, resource home approval, concurrent planning, and relative placement.

A qualitative assessment utilized by DCS is the FFA which is an inclusive, living document that captures the results of all other assessment tools and provides historical information from the family, child, and other team members. The FFA continually evaluates a child and family's strengths and needs as well as offering an explanation as to why those strengths and needs exist. Data indicate that from January 2007 through July 2007, 92.9 percent of children who entered custody had the FFA initiated. Of the children who entered care in April of 2008, 92 percent had a CANS completed.

In addition to the assessment protocol, DCS has developed Well-Being Unit meetings to assist with assessments and service planning. These meetings include the M.S.S.W. consultant, Education Specialist, nurse practitioner, and staff psychologist. These specialists review the assessment tools available to ensure that the best placement for the child was made in addition to ensuring the identified needs and services are being addressed. According to the Statewide Assessment, this review process has averted many potential crisis with clients.

As reported in the Statewide Assessment, the QSR data indicate that developing quality assessments and linking the appropriate services to meet the needs of families is a challenge for caseworkers. The QSR includes a rating of the assessment process in the Ongoing Functional Assessment indicator. Review results from 2007-2008 reviews indicate 28 percent of Ongoing Functional Assessment scores were in the acceptable range. The Plan Implementation indicator rates how well services are being utilized.

This indicator found 32 percent acceptable in the 2007-2008 QSR process. QSR data indicate that the Resource Availability and Use indicator was rated acceptable in 64 percent of the 2007-2008 cases.

Communication, according to the Statewide Assessment, between private providers and DCS also is an issue affecting assessment and service provision. During a May 2008 focus group with service providers in Hamilton County and Shelby County, participants voiced the concern that in many cases assessment information is not shared between DCS and providers. In addition, providers do not receive the necessary information from the department in order to provide appropriate services.

Resource parents, according to the Statewide Assessment, receive a variety of services and support through DCS, including case management services provided by the Resource Parent Support Worker and the caseworker. They also may access concrete services such as day care vouchers, reimbursement for extraordinary transportation costs, and in-home counseling or wraparound services, depending upon the needs of the children placed in the resource home. In addition, resource parents can find support and advocacy by joining Tennessee's Foster and Adoptive Care Association.

DCS, according to the Statewide Assessment, has clear policies on the requirements for providing Independent Living Program (ILP) services to all children in foster care beginning at age 14, regardless of the goal. Youth with a goal of OPPLA work intensively with the ILP specialist to ensure they are prepared for the transition into adulthood. According to the Statewide Assessment, the Office of Interdependent Living has established and expanded a grant contract with Youth Villages to provide Transitional Living Services to eligible youth and young adults. This program is open to youth exiting State custody to adulthood. Services include the identification of housing resources, employment, educational attainment, life skills preparation, and the enhancement of permanent adult connections. At the time of the Statewide Assessment, there were 261 youth and young adults receiving services.

As reported in the Statewide Assessment, at the time of the assessment, DCS was serving 573 youth through Voluntary Post-Custody services, including funding for education through the Chafee Education and Training Voucher system. Additionally, 127 of these youth were receiving direct housing support to maintain an IL arrangement. Moreover, these youth receive ongoing case management support and ongoing planning through regional staff and the staff of the ILP.

Stakeholder Interview Information

According to stakeholders in Bradley County and Shelby County commenting on this item during the Onsite Review, the DCS has moved from an incident-based assessment to a family-centered assessment that assists in getting to the underlying issues. Stakeholders reported that assessments are ongoing and reassessments are completed at designated times. Stakeholders in Bradley County reported that the FFA is a good, ongoing document that, according to Shelby County stakeholders, supports the

CANS. The FFA is useful to everyone who needs to understand a child's needs. Additionally, CANS can help identify the treatment needs and treatment level of children. However, some stakeholders in Bradley County expressed concern that CANS only assesses children 5 years old and older, thus leaving the most vulnerable without an adequate assessment. Stakeholders also reported that the Well-Being Unit has improved the quality of assessments.

Putnam County stakeholders reported that mental health services are available to parents, and the providers accept insurance or the fee is calculated by a sliding scale based on parent income.

Shelby County stakeholders reported that parent assessments and evaluations can be paid for with DCS funds.

Stakeholders at the State level reported that the UPP has encouraged resource families to engage birth families. Stakeholders at the State level also reported that the Foster Parents Bill of Rights requires a Foster Parent Advocacy program at the regional level. Therefore, there is a foster parent advocate in most regions. If an allegation of child maltreatment has been made against the foster parent, they have the right to have an advocate present. A primary concern of foster parents, according to stakeholders at the State level, is not receiving a 14-day notice of removal prior to children being moved from their home. Another concern voiced by stakeholders at the State level, is that caseworkers do not always have the required amount of contacts with foster parents. DCS, according to stakeholders at the State level, offers a mentorship program which is currently operating in about half the State. The goal of the program is to assign a mentor to prospective foster parents as they begin Parents As Tender Healers (PATH) training.

According to stakeholders at the State level, the entire family should be assessed as part of the DJJ assessment process. The YLS conducted on youth who are part of the juvenile justice system identifies the risk of criminality.

According to stakeholders in Putnam County and Shelby County and at the State level, youth at the age of 14 are referred to an ILP. The TN Kids permanency plan, according to Putnam County and State level stakeholders, now includes an IL plan, which triggers the Ansell Casey Assessment. Therefore, caseworkers must complete the IL plan to generate the permanency plan for youth 14 and over. The evaluation of the youths' needs continue throughout the year, and services become more intensive as they age.

According to State level stakeholders, there are ILP regional staff who provide services to youth. Additionally, stakeholders reported that private providers also are used to providing IL services. Most stakeholders at the three review sites and at the State level expressed the opinion that the services provided by and through the ILP were beneficial to youth. Stakeholders across the

sites credited ILP caseworkers for assisting youth in educational advancement and in success in other social and post-custody endeavors.

According to stakeholders at the State level, the biggest challenges in meeting the needs of youth are housing, finding foster parents willing to take children 18 years and over, and preparing youth who enter foster care in their late teens for IL. According to stakeholders across the sites, children involved in an education plan are eligible for post-custody services. Those not involved in an educational plan, according to State level staff, are referred to Youth Villages, which provides services to transitioning youth.

According to stakeholders at the review site and at the State level, services provided to youth include:

- Educational services
- Sex education
- HIV awareness
- College preparatory classes
- Money management and budgeting
- How to balance a checkbook
- Job skills
- Time management classes
- Public speaking classes
- Financial assistance/allowance
- Cooking skills
- Assistance with college applications
- Payment of driving test fees
- Purchase of school books

In addition to the above services, State stakeholders reported that three Leadership Academies were conducted on college campuses with more than 75 youth in attendance. There also is a mentoring program contract that uses AmeriCorps volunteers. The program began in January 2007, and as of June 1, 2008, there were 290 trained mentors and 287 active mentor matches. The program has served 347 youth. Putnam County stakeholders discussed Opportunity Passport, which works with a bank to match up to \$1,000 for post-custody youth who are accepted into the program. The youth are paid a stipend for attending four life skill classes.

According to stakeholders at the three review sites and the State level, the ILP can assist youth with expenses related to secondary education, including room and board, car maintenance, living allotment, college tuition, and books. Some stakeholders across the site expressed concern that payment or reimbursement for expenses sometimes is delayed.

Although most stakeholders across the sites spoke favorably of the ILP, some stakeholders at the State level expressed the opinion that the current IL services are not adequate and that there are not enough services to meet needs. One crucial need reported by these stakeholders is the need for transitional living housing. In addition, some stakeholders in Shelby County reported that DCS does not provide IL services as they are required and wait until the youth is preparing to transition out of foster care to begin IL planning. Also, according to these stakeholders, IL plans are not always included with the permanency plan.

Stakeholders at the State level reported that post-custody youth may volunteer for the ILP. According to stakeholders in Putnam County, at the age of 17.5, a youth meets with the ILP Specialist and is given an opportunity to participate in post-custody services. These stakeholders reported that youth must sign a waiver if they do not want to receive post-custody services. Shelby County stakeholders reported that if a youth cannot graduate from high school by the age of 19, they are ineligible for post-custody services. According to stakeholders in Shelby County, after a child leaves foster care, he or she has up to 1 year to request services. Stakeholders at the State level reported to request services the youth must complete an application at the DCS office. Shelby County and State level stakeholders advised that a CFTM is held to discuss the services needed by the youth. State level stakeholders reported that DCS is in the process of developing an 800 number to assist youth in accessing ILP information.

According to State level stakeholders, youth with mental health and substance abuse issues are referred to TennCare (Medicaid) prior to aging out of foster care to ensure continuation of services.

Stakeholders in Putnam County voiced frustration about the recent disbanding, due to budgetary restraints, of the Post-Custody Unit, which assisted youth no longer in foster care. It is now, according to stakeholders, the responsibility of the assigned caseworkers to offer services to post-custody youth.

Shelby County stakeholders expressed the opinion that there are few services available to teenage mothers and their children even within the foster care system.

Stakeholders also commented on the availability of services. These comments are included under item 35 in the systemic factors section.

Item 18. Child and family involvement in case planning

 Strength X Area Needing Improvement

Case Review Findings

Item 18 was applicable for 62 (95 percent) of the 65 cases. A case was not applicable if parental rights had been terminated prior to the period under review and parents were not involved with the child in any way and the child was too young or had cognitive delays or other conditions that were barriers to participation in case planning. In assessing this item, reviewers were to determine whether parents and children (if appropriate) had been involved in the case planning process, and if not, whether their involvement was contrary to the child’s best interests. A determination of involvement in case planning required that a parent or child had actively participated in identifying the services and goals included in the case plan. The results of this assessment are presented in the table below.

Item 18	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	9	6	9	24	39
Area Needing Improvement	7	11	20	38	61
Total Applicable Cases	16	17	29	62	
Not Applicable Cases	1	0	2	3	
Total Cases	17	17	31	65	

Item 18 was rated as a Strength in 56 percent of applicable Bradley County cases, 35 percent of applicable Putnam County cases, and 31 percent of applicable Shelby County cases. The item was rated as a Strength in 54 percent (20 cases) of the 37 applicable foster care cases and 16 percent (4 cases) of the 25 in-home services cases.

Item 18 was rated as a Strength when reviewers determined that all appropriate parties had actively participated in the case planning process or that the agency had made concerted efforts to involve them in the case planning process. The item was rated as an ANI when reviewers determined that the agency had not made concerted efforts to involve the mother, father, and/or child (if age appropriate) in the case planning process.

Specific information regarding involvement in case planning is provided in the table below. It is important to note that the exclusion of fathers from case planning occurred even when fathers’ whereabouts were known, and they were involved with or living with the child.

Involvement in Case Planning	Foster Care		In-Home Services	
	Yes	Total	Yes	Total
Mother involved in case planning	19 (73%)	26	14 (56%)	25
Father involved in case planning	8 (42%)	19	6 (27%)	22
Child (if age appropriate) involved in case planning	21 (78%)	27	6 (30%)	20

Rating Determination

Item 18 was assigned an overall rating of ANI. Reviewers determined that the agency had made diligent efforts to involve parents and/or children in the case planning process in only 39 percent of the applicable cases. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, the permanency plan (case plan) is developed during a CFTM with the active involvement and input from everyone present. At the conclusion of the meeting, participants are given a handwritten copy of the permanency plan that everyone signs. Caseworkers are required to conduct the initial permanency planning CFTM and have a completed plan, signed by the parents, submitted to the court no later than 30 days after custody. The Statewide Assessment also notes that permanency plans are reviewed every 3 months in a Progress Review CFTM.

Data provided in the Statewide Assessment present the following findings for the period from October 2007 to December 2007:

- 37 percent of the initial permanency planning CFTMs were attended by at least one mother.
- 19 percent of the initial permanency planning CFTMs were attended by at least one father.
- 89.9 percent of the Initial Permanency Planning CFTMs were attended by youth over 12.

In 2007, the Office of Performance Measurement conducted satisfaction surveys with youth and parents. Eighty surveys were completed by youth. Findings included the following:

- 69 percent of youth agreed with the statement: “I help plan my services and set my goals.”
- 59 percent of youth agreed with the statement: “Overall, I am satisfied with the services that I am receiving.”
- 41 percent of youth agreed with the statement: “DCS asks me about my ideas on how to improve its services.”

For the 126 surveys completed by parents, the following findings were reported:

- 61 percent of parents agreed with the statement: “I help plan my services and set my goals.”
- 63 percent of parents agreed with the statement: “Overall, I am satisfied with the services that I am receiving.”
- 46 percent of parents agreed with the statement: “DCS asks me about my ideas on how to improve its services.”

Stakeholder Interview Information

Most stakeholders at the three review sites commenting on this item during the onsite CFSR expressed the opinion that overall DCS makes concerted efforts to involve parents and children in case planning. Putnam County stakeholders reported that caseworkers ensure the involvement of incarcerated parents and that case planning meetings are scheduled to accommodate children’s school schedules.

The case plan is developed during a CFTM for foster care cases and during a FSTM for Assessment and CPS cases. Stakeholders in Bradley County expressed the opinion that families are more engaged in the FSTM than in CFTM because DCS does not have custody of the children, and the meetings are conducted in the family home. These stakeholders reported that the number of children in custody in Bradley County has decreased and attributes the decrease in part to the FSTM process.

Bradley County stakeholders reported that DJJ conducts an assessment, an Individual Program Plan, with the family that addresses the entire family. The plans are reviewed every 30 days if possible, but must be reviewed quarterly.

Item 19. Caseworker visits with child

Strength Area Needing Improvement

Case Review Findings

Item 19 was applicable for all 65 cases. In conducting the assessment of this item, reviewers were to determine whether the frequency of visits between the caseworkers and children was sufficient to ensure adequate monitoring of the child’s safety and well-being and whether visits focused on issues pertinent to case planning, service delivery, and goal attainment. The results of this assessment are presented in the table below.

Item 19	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	10	10	21	41	63
Area Needing Improvement	7	7	10	24	37
Not Applicable	0	0	0	0	0
Total Cases	17	17	31	65	

The item was rated as a Strength in 68 percent of Shelby County cases and 59 percent of Putnam County and Bradley County cases. The item was rated as a Strength in 92.5 percent (37 cases) of the 40 foster care cases compared to only 16 percent (4 cases) of the 25 in-home services cases.

Item 19 was rated as a Strength when reviewers determined that the frequency and quality of visits between caseworkers and children were sufficient to ensure adequate monitoring of the child’s safety and well-being and promote attainment of case goals. Item 19 was rated as an ANI when reviewers determined the following:

- The frequency of caseworker visits was not sufficient to meet the needs of the child, and the visits did not focus on issues pertinent to case planning, service delivery, and goal attainment (15 cases). In a number of these cases, the caseworker visited only with the child who was the focus of the agency’s involvement and did not interact or observe other children in the home.
- The frequency of caseworker visits was not sufficient to meet the needs of the child, although when visits did occur they were substantive (one case).
- The frequency of caseworker visits was sufficient, but the visits did not focus on issues pertinent to case planning, service delivery, and goal attainment (five cases).
- The agency caseworker did not visit the child (three cases).

Specific information regarding the frequency of visitation is provided in the table below.

Typical frequency of caseworker visits with child (during the period under review)	Foster Care Cases	In-Home Services Cases
Visits occurred at least once a week	6 (15%)	1 (4%)
Visits occurred less frequently than once a week but at least twice a month	19 (47.5%)	4 (16%)
Visits occurred less frequently than twice a month but at least once a month	15 (37.5%)	4 (16%)
Visits occurred less frequently than once a month	0 (0%)	13 (52%)
Visits did not occur	0 (0%)	3 (12%)
Total Cases	40	25

Rating Determination

Item 19 was assigned an overall rating of ANI. In 63 percent of the cases, reviewers determined that caseworker visits with children were of sufficient frequency and/or quality. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that caseworkers must visit children in foster care twice a month and that one of the two monthly visits must occur in the child's home. DCS monitors whether these visits are occurring; however, it does not have the capability to monitor the quality of visits.

DCS policy for children receiving in-home services requires that children be interviewed face-to-face at least once during an investigation of abuse or neglect and no less than once every 2 weeks following classification. Policies on MRS specify that children receiving in-home services through assessment shall be seen twice within the first month with at least one visit taking place in the home. Visitation for assessments continuing beyond 30 days is to take place no less frequently than twice a month thereafter.

According to the Statewide Assessment, caseworkers met policy requirements in 73.7 percent of foster care cases in July 2007. For the April 30, 2008, DCS and Private Provider Aggregate Face-to-Face Contacts report, Brian A. children statewide were seen at least twice per month at a rate of 86.4 percent, and the percentage of children statewide who had no contacts was 1.8 percent. TN Kids data indicate that in August 2007, 55.9 percent of children receiving in-home services had at least one face-to-face contact with the caseworker each month, and 32.2 percent of children had two or more face-to-face contacts reported. In March of 2008, 84 percent of children receiving in-home services had at least one face-to-face contact each month, with

33.6 percent having two or more face-to-face contacts each month. Face-to-face contact reports are reviewed at least monthly by Continuous Quality Improvement (CQI) coordinators and management staff, and they are used to follow up with caseworkers regarding their visitations with children.

Stakeholder Interview Information

Some stakeholders at the three review sites commenting on this item during the onsite CFSR indicated that generally caseworkers are seeing the children on their caseloads on a frequent basis. These stakeholders also reported that the quality of caseworker contacts with children varies based on the caseworker.

Putnam County and Shelby County stakeholders reported that the CQI team assesses caseworker visitation and reports pertaining to visitation. CQI assesses the reasons contacts are not made. According to Putnam County stakeholders, frequently there is a lack of data or information missing from the private provider.

Item 20. Caseworker visits with parents

 Strength **X** Area Needing Improvement

Case Review Findings

Item 20 was applicable for 54 (83 percent) of the 65 cases. Cases were not applicable for this assessment if parental rights had been terminated prior to the period under review and parents were no longer involved in the lives of their children. All cases that were not applicable were foster care cases. Reviewers were to assess whether the caseworker’s face-to-face contact with the children’s mothers and fathers was of sufficient frequency and quality to promote attainment of case goals and/or ensure the children’s safety and well-being. The results of this assessment are presented in the table below.

Item 20	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	6	4	4	14	26
Area Needing Improvement	6	10	24	40	74
Total Applicable Cases	12	14	28	54	
Not Applicable Cases	5	3	3	11	
Total Cases	17	17	31	65	

The item was rated as a Strength in 50 percent of applicable Bradley County cases, 29 percent of applicable Putnam County cases, and 14 percent of applicable Shelby County cases. The item was rated as a Strength in 38 percent (11 cases) of the 29 applicable foster care cases and 12 percent (3 cases) of the 25 in-home services cases.

Item 20 was rated as a Strength when reviewers determined that visits occurred with sufficient frequency to meet the needs of parents and children and that visits focused on issues pertinent to case planning, service delivery, and goal attainment. Item 20 was rated as an ANI when reviewers determined the following:

- Visits with the mother were not of sufficient frequency or quality (15 cases).
- Visits with the mother were not of sufficient frequency, although when they did occur they were of sufficient quality (three cases).
- Visits with the mother were of sufficient frequency, but not quality (six cases).
- Visits with the father were not of sufficient frequency or quality (13 cases).
- Visits with the father were not of sufficient frequency, although when they did occur they were of sufficient quality (one case).
- There were no visits with father (18 cases).
- There were no visits with mother (four cases).

Specific information pertaining to the frequency of caseworker visits with parents is provided in the following table.

Typical frequency of caseworker visits with parents	Foster Care Cases		In-Home Services Cases	
	Mother	Father	Mother	Father
Visits occurred at least once a week	1 (4%)	0 (0%)	0 (0%)	0 (0%)
Visits occurred less frequently than once a week but at least twice a month	9 (35%)	2 (11%)	3 (12%)	1 (5%)
Visits occurred less frequently than twice a month but at least once a month	9 (35%)	2 (11%)	6 (24%)	2 (9%)
Visits occurred less frequently than once a month	5 (19%)	7 (39%)	14 (56%)	8 (36%)
Visits did not occur	2 (8 %)	7 (39%)	2 (8%)	11 (50%)
Total Applicable Cases	26	18	25	22

Additional findings were the following:

- For the 26 foster care cases and the 25 in-home cases for which visits with mothers were applicable, there were 23 cases (45 percent) in which these visits occurred less than once a month or not at all.
- For the 18 foster care cases and the 22 in-home cases for which visits with fathers were applicable, there were 33 cases (82.5 percent) in which these visits occurred less than once a month or not at all.

Rating Determination

Item 20 was assigned an overall rating of an ANI. Reviewers determined that the frequency and/or quality of caseworker visits with parents were sufficient to monitor the safety and well-being of the child or promote attainment of case goals in 26 percent of the 54 applicable cases. This percentage is less than the 90 percent required for a rating of Strength. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires that caseworkers visit with the parents of children in foster care at least once a month in the parent's residence. As reported in the Statewide Assessment, this guideline is generally followed unless the department has received a court order that reasonable efforts are not required. Additionally, parents being served through the Assessment track must be seen at least twice during the first month with at least one visit taking place in the home. Visitation for assessments continuing beyond 30 days should occur no less than twice a month thereafter. As reported in the Statewide Assessment, caseworkers visit parents in their homes, during CFTMs, at various medical and therapeutic appointments for both the children and parents, at work, in jail or prison if needed, and in a variety of other locations as is necessary and appropriate.

Stakeholder Interview Information

Stakeholders did not comment on this item during the onsite CFSR.

Well-Being Outcome 2

Outcome WB2: Children receive appropriate services to meet their educational needs					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	12	9	19	40	83.3
Partially Achieved	1	0	2	3	6.3
Not Achieved	2	1	2	5	10.4
Total Applicable Cases	15	10	23	48	
Not Applicable Cases	2	7	8	17	
Total Cases	17	17	31	65	

Status of Well-Being Outcome 2

Tennessee is not in substantial conformity with Well-Being Outcome 2. The outcome was substantially achieved in 83.3 percent of the 48 applicable cases. This is less than the 95 percent required for substantial conformity. The outcome was determined to be substantially achieved in 90 percent of applicable Putnam County cases, 83 percent of applicable Shelby County cases, and 80 percent of applicable Bradley County cases. Tennessee was not in substantial conformity with this outcome in its 2002 CFSR and was required to address the outcome in its PIP.

Key Concerns From the 2002 CFSR

The following key concerns were identified in the 2002 CFSR:

- A lack of advocacy for the child around education-related issues
- A lack of educational alternatives for children who have been expelled or suspended from school
- An inadequacy of educational services in residential placement settings

To address these concerns, the State implemented the following strategies in its PIP:

- Continued the implementation of the Education Plan, which includes a plan for schools in residential settings

- Monitored staff performance to ensure that both DCS staff and contract staff meet the educational standards outlined for custodial and noncustodial children

The State met its target goals for this outcome by the end of the PIP implementation period.

Key Findings of the 2008 CFSR

The findings pertaining to the specific item assessed under Well-Being Outcome 2 during the 2008 CFSR are presented and discussed below.

Item 21. Educational needs of the child

 Strength X Area Needing Improvement

Case Review Findings

Item 21 was applicable for 48 (74 percent) of the 65 cases reviewed. Cases were not applicable if any of the following applied: (1) children were not of school age, or (2) children in in-home cases did not have service needs pertaining to education-related issues. In assessing this item, reviewers were to determine whether children’s educational needs were appropriately assessed and whether services were provided to meet those needs. The results of this assessment are provided below.

Item 21	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	12	9	19	40	83
Area Needing Improvement	3	1	4	8	17
Total Applicable Cases	15	10	23	48	
Not Applicable	2	7	8	17	
Total Cases	17	17	31	65	

Item 21 was rated as a Strength when reviewers determined that the child’s educational needs were appropriately assessed and services were provided, if necessary. Item 21 was rated as an ANI when reviewers determined one of the following:

- There was a lack of assessments of educational needs even when there was clear evidence that the child was experiencing school-related problems (five in-home cases).

- Educational issues were identified but services were not provided to address the needs, nor did the caseworker follow-up to ensure the issues were addressed (two foster care cases).
- Educational needs and documentation could not be located in the case record (one foster care case).

Rating Determination

Item 21 was assigned an overall rating of ANI. In 83 percent of the applicable cases, reviewers determined that the agency had made diligent efforts to meet the educational needs of children. This percentage is lower than the 95 percent required for this item to be rated as a Strength. A 95-percent standard is established for this item because it is the only item included in the outcome. This item also was rated as an ANI in the 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS staffs a 25-person Division of Education that is charged with the task of supporting the provision of appropriate educational services to children in DCS custody. It is the policy of the DCS to ensure that students in State custody receive appropriate educational services, including special education when necessary.

Youth who are placed in DCS-operated group homes and in provider agencies may attend public school or an in-house school, depending on their treatment needs.

According to the Statewide Assessment, the 15 Education Specialists statewide consult with caseworkers, resource parents, and schools regarding any education issue, but especially issues related to enrollment, special education services, 504 planning, discipline, and school records. The education specialists provide information for and attend CFTMs, Individualized Education Program Meetings (IEP), and 504 meetings in order to ensure that students in custody are receiving appropriate educational services. According to the Statewide Assessment, the addition of the Education Specialists has been essential to supporting DCS's commitment to serving children in public school settings. The positive relationships formed between the Education Specialists and the public schools have enabled students to receive needed services and remain in school when circumstances might have warranted suspensions or expulsions.

The QSR includes an indicator that measures the extent to which the child is performing at grade level or to the level anticipated in an IEP; is involved in educational, vocational, and interdependent living activities as appropriate; is enrolled in an appropriate educational program; and for very young children, the extent to which they are meeting expected developmental milestones. In the 2007-2008 reviews, 81 percent of the children were rated as having acceptable Learning and Development.

According to the Statewide Assessment, the following are challenges to DCS efforts to meet children's educational needs:

- The difficulty of finding alternative education programs for expelled students (especially in rural areas and for high school students)
- The difficulty of identifying services for special needs children and/or children with more intensive needs in rural areas
- Enrolling high school students promptly in public school systems
- Getting resource parents to play an active role in education beyond attendance checks and report card checks
- Deepening the level of attention of caseworkers and frontline supervisors to education needs and issues, beyond doing checks on attendance and special education concerns
- Transferring credits and dealing with scheduling issues
- Promoting school stability by working with school systems to allow children to remain in his/her school upon entering custody or upon a placement move
- Addressing transportation issues, particularly in alternative school situations or where youth are attending out-of-zone schools in order not to transfer schools

In September 2007 the Technical Assistance Committee reported that 61 percent of children changed schools as a result of coming into foster care. For children who experienced a placement change once in foster care, 55 percent had to change schools as a result of the placement change.

While DCS and the Department of Education (DOE) work well together on many issues, according to the Statewide Assessment, the lack of a clear Memorandum of Understanding around some of the issues listed above, as well as around truancy issues, educational neglect, and data sharing, potentially limit both departments' efforts to meet the educational needs of children in or at risk of State custody.

Stakeholder Interview Information

According to stakeholders across the three review sites and at the State level commenting on this item during the Onsite Review, the educational needs of the children are assessed and met by DCS and DOE. However, these stakeholders also reported that it can be a challenge to provide consistent education services for children in foster care due to children's frequent placement changes. In addition, these stakeholders indicated that although DCS makes a diligent effort to maintain children in the same school district, when children have to change districts, there often are problems with credits transferring due to the different scheduling systems of the home school and the new school. Stakeholders reported that generally, DCS and DOE work together to resolve these issues. However, some stakeholders reported delays in grade promotion and graduation due to credit

loss during district transfers. Some stakeholders expressed the opinion that if all schools were placed on the same scheduling system, the majority of the education-related issues for children in foster care would be resolved.

As reported by stakeholders at the three review sites and the State level, Education Specialists play a key role in ensuring that the education needs of children are met. They noted that there are 15 Education Specialist across the State who review children’s education records, attend IEP meetings and disciplinary meetings, and advocate for the children.

Stakeholders at the State level expressed the opinion that the DCS and DOE collaborate and communicate well on issues pertaining to children in foster care.

Well-Being Outcome 3

Outcome WB3: Children receive adequate services to meet their physical and mental health needs					
Number of cases reviewed by the team according to degree of outcome achievement					
	Bradley County	Putnam County	Shelby County	Total	Percent
Substantially Achieved	10	9	18	37	66.1
Partially Achieved	3	1	2	6	10.7
Not Achieved or Addressed	1	4	8	13	23.2
Total Applicable Cases	14	14	28	56	
Not Applicable	3	3	3	9	
Total Cases	17	17	31	65	

Status of Well-Being Outcome 3

Tennessee is not in substantial conformity with Well-Being Outcome 3. The outcome was determined to be substantially achieved in 66.1 percent of the 56 applicable cases, which is less than the 95 percent required for substantial conformity. The outcome was substantially achieved in 71 percent of applicable Bradley County cases and 64 percent of applicable Putnam and Shelby County cases. The outcome was substantially achieved in 87.5 percent (35 cases) of the 40 foster care cases and 12.5 percent (2 cases) of the 16 applicable in-home services cases. Tennessee was not in substantial conformity with this item in its 2002 CFSR and was required to address the item in its PIP.

Key Concerns From the 2002 CFSR

The following concerns were identified in the 2002 CFSR:

- Some children who appeared to need mental health assessments had not received them, and some children who had mental health assessments had not received all of the services recommended by the assessment.
- In some cases, recommended services were documented but there was no follow up to determine whether services had been provided.

To address these concerns, the State implemented the following strategies in its PIP:

- The State ensured that every child coming into care received a medical examination within 30 days and, if appropriate, a psychological evaluation within 30 days.
- The State developed practices to ensure that if evaluations or examinations resulted in a need for services, that there was follow up to determine if the services were provided.
- The State developed and actively implemented a plan for ensuring compliance with the policies regarding the use of psychotropic medications, restraints, and seclusion.

The State met its target goals for this outcome by the end of the PIP implementation period.

Key Findings of the 2008 CFSR

Findings pertaining to the specific items assessed under Well-Being Outcome 3 during the 2008 CFSR are presented and discussed below.

Item 22. Physical health of the child

Strength **Area Needing Improvement**

Case Review Findings

Item 22 was applicable for 45 (69 percent) of the 65 cases reviewed. Cases that were not applicable were in-home services cases in which physical health concerns were not an issue. In assessing this item, reviewers were to determine whether (1) children's physical health needs (including dental needs) had been appropriately assessed, and (2) the services designed to meet those needs had been, or were being, provided. The findings of this assessment are presented in the table below.

Item 22	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	11	10	20	41	91
Area Needing Improvement	1	1	2	4	9
Total Applicable Cases	12	11	22	45	
Not Applicable Cases	5	6	9	20	
Total Cases	17	17	31	65	

Item 22 was rated as a Strength in 92 percent of applicable Bradley County cases and 91 percent of applicable Putnam and Shelby County cases. The item was rated as a Strength in 100 percent of the 40 foster care cases and 20 percent (1 case) of the 5 applicable in-home services cases.

Item 22 was rated as a Strength when reviewers determined that children's health needs (medical and dental) were routinely assessed and identified needs were addressed by appropriate services. Item 22 was rated as an ANI when reviewers determined one of the following:

- Neither medical nor dental needs were assessed or met (three in-home cases).
- Medical needs were assessed but not met and dental needs were not assessed or met (one in-home case).

Rating Determination

Item 22 was assigned an overall rating of a Strength. Reviewers determined that the agency was effective in assessing and meeting the physical health needs of children in 91 percent of the cases. This percentage exceeds the 90 percent required for an overall rating of Strength. This item also was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, children entering care are assigned immediate eligibility and a primary care provider (PCP) for TennCare services to facilitate immediate health service needs and the initial Early Periodic Screening, Diagnosis,

and Treatment (EPSDT) screening. Policy requires that the child be taken for a screening within 30 days of entering care. EPSDT screenings are performed by providers designated by the Tennessee Department of Health (DOH) who are knowledgeable about foster care and Medicaid requirements of EPSDT screening components.

A summary sheet indicating the completed components of the screening, and findings of the screening, is provided by DOH or designated provider to the child's assigned PCP with a copy to the DCS Well-Being team. Well-Being teams review all screens with regional staff, assist with plan development, make recommendations, and track identified services. Follow-up health services are also identified at the CFTM and action steps are assigned as appropriate.

Health information, according to the Statewide Assessment, about children in foster care is provided to resource parents and to agencies caring for children. Resource parents, caseworkers, and out-of-home providers share the responsibility for coordinating medical care.

The QSR Physical Health indicator for the 6 regions reviewed in 2007-2008 prior to the Statewide Assessment completion indicated 97 percent of the children reviewed were receiving acceptable physical health services. Additionally, as reported in the Statewide Assessment, data indicate that 92.8 percent of children in foster care receive an annual health screening.

Stakeholder Interview Information

Stakeholders at the three review sites commenting on this item during the onsite CFSR expressed the opinion the DCS is effective in assessing the physical and medical needs, including dental, of children receiving foster care services. Each child, according to stakeholders, receives an EPSDT within 30 days of entering care and needed follow up is monitored and ensured by the Well-Being Unit. According to stakeholders in Bradley County and Putnam County, a registered nurse from the Well-Being Unit monitors cases to ensure children are receiving the appropriate medical treatment. Additionally, stakeholders in Bradley County reported that the QA team reviews cases to ensure children medical needs have been met.

Stakeholders at all sites reported that dental and medical services that accept TennCare are available in their areas. Additionally, Putnam County stakeholders reported that in their region there is a mobile dental unit that provides dental services.

Item 23. Mental health of the child

Strength **Area Needing Improvement**

Case Review Findings

Item 23 was applicable for 46 (71 percent) of the 65 cases reviewed. Cases were not applicable if the child was too young for an assessment of mental health needs, or if there were no mental health concerns. In assessing this item, reviewers were to determine whether (1) mental health needs had been appropriately assessed and (2) appropriate services to address those needs had been offered or provided. The findings of this assessment are presented in the table below.

Item 23	Bradley County	Putnam County	Shelby County	Total	Percent
Strength	11	5	13	29	63
Area Needing Improvement	3	5	9	17	37
Total Applicable Cases	14	10	22	46	
Not Applicable Cases	3	7	9	19	
Total Cases	17	17	31	65	

The item was rated as a Strength in 79 percent of applicable Bradley County cases, 59 percent of applicable Shelby County cases, and 50 percent of applicable Putnam County cases. The item was rated as a Strength in 84 percent (26 cases) of the 31 applicable foster care cases and 20 percent (3 cases) of the 15 applicable in-home services cases.

Item 23 was rated as a Strength when reviewers determined that children’s mental health needs were appropriately assessed and the identified mental health needs were addressed. Item 23 was rated as an ANI when reviewers determined the following:

- Mental health needs were not assessed or met (11 in-home cases, 3 foster care cases).
- Mental health needs were assessed but not met (1 in-home case, 2 foster care cases).

Ratings Determination

Item 23 was assigned an overall rating of an ANI. In 63 percent of the applicable cases, reviewers determined that the agency had made concerted efforts to address the mental health needs of children. This percentage is less than the 90 percent required for a rating of Strength. This item was also rated as an ANI in Tennessee’s 2002 CFSSR.

Statewide Assessment Information

According to the Statewide Assessment, a behavioral screening tool is incorporated into the EPSDT screening provided by DOH or designated provider. For children under age 4, the Parents’ Evaluation of Developmental Status tool is used; for children age 4 and older, the Pediatric Symptom Checklist is used. All of this information is reviewed by designated members of

the Well-Being team and shared with regional staff. The psychologist on the Well-Being team reviews the well-being history and information tool and provides recommendations to address identified behavioral health needs. Behavioral health information about children in foster care is provided to resource parents and to agencies caring for children.

For behavioral health, children are assigned to the Behavioral Health Organization (BHO). The BHO provides customer service to Well-Being teams and caseworkers to assist in coordinating health services. The BHO provides the department with assessment information for children utilizing crisis services, as well as discharge summaries from inpatient hospital stays.

Historically, according to the Statewide Assessment, DCS has struggled to find adequate services for young adults age 18 and older. Efforts to transition these youth to adult services were often hampered by a shortage of community-based services for youth with mental retardation. Therefore, these youth were often forced to stay in the custody of DCS and receive voluntary services. Over the past several years, the DCS, in collaboration with the Division of Mental Retardation Services (DMRS) and the BHO, has enhanced its efforts to transition DCS youth from custody to adult mental retardation and behavioral health. Additionally, the Statewide Assessment reports that DCS has a dedicated Central Office Transition Specialist coordinator who works with regional liaisons to manage the more difficult cases that are either DMRS or Department of Mental Health and Developmental Disability (DMHDD) dependent, thus youth transition out of care more successfully.

Issues with the behavioral mental health services identified in the Statewide Assessment are listed below.

- Behavioral health services are not sufficiently targeted to address the unique needs of children affected by grief, loss, and attachment issues.
- DCS has begun to track specific behavioral health services; however, the reporting of identified gaps is still under development.
- The State is lacking in quality substance abuse treatment resources.
- TennCare eligibility after discharge from foster care is not guaranteed.
- In-home treatment services lack sufficient coordination and monitoring after discharge.

QSR has an indicator for Emotional/Behavioral Well-Being, applicable to all children age 2 and older. This indicator does not rate service provision, but provides a snapshot of how well children are doing behaviorally and emotionally and how well they function in daily settings. This rating also incorporates the effectiveness of any services being provided when applicable. In the 2007-2008 QSR, 74 percent of the children rated acceptably.

Stakeholder Interview Information

Stakeholders at the three review sites commenting on this item during the Onsite Review expressed the opinion that mental health needs are being assessed but had differing opinions about the availability of mental health services. Stakeholders at the three review sites did all report that the Centers of Excellence (COE) for Children in State Custody conducts consultations with the psychiatric hospital's team for children with extreme mental health issues. Additionally, all sites reported that the psychologist from the Well-Being Unit reviews the mental health assessment and ensures follow-up services are provided. Stakeholders at the State level reported that the in-house psychiatrist monitors all children receiving psychotropic medication through TennCare.

Some Bradley County stakeholders reported that mental health services are available in the area but that parents have unrealistic expectations about the results. However, other Bradley County stakeholders voiced concern for the accessibility of quality mental health services for children with mental health needs as services are limited and those available frequently have waiting lists. Additionally, according to stakeholders in Bradley County, there is not a Board-certified child psychiatrist in the area, and it may take months to secure an appointment with a child psychiatrist in another area of the State. Stakeholders in Bradley County also reported that the community mental health agency experiences a lot of turnover in therapists; therefore trauma reduction is affected because children do not have one, consistent, long-term therapist who can work with difficult cases.

Similar to Bradley County stakeholder's comments, some Putnam County stakeholders reported that although there is not a child psychiatrist in the area, and most clinical services are in the larger metropolitan area, mental health services are available to the children. However, other stakeholders in Putnam County reported that there is a need for child counseling services in the area.

Shelby County stakeholders commenting on this item during the onsite CFSR reported that services are available in the community. The initial mental health screening is conducted by DOH. Referrals for follow-up are provided and medication monitoring is conducted by DOH. Additionally, the school system in Shelby County has an outpatient mental health division in all of the schools. The majority of referrals for services come through the teachers, parents, and the Student Support Team, which has criteria to determine the need for services and the impact on academic performance.

SECTION B: SYSTEMIC FACTORS

This section of the CFSR Final Report provides information regarding the State’s substantial conformity with the seven systemic factors examined during the CFSR. Information on the items included under each systemic factor comes from the Statewide Assessment and from interviews with stakeholders held during the onsite CFSR. Additional information may come from other Federal reports or assessments.

Each item included in a systemic factor reflects a key Federal program requirement relevant to the Child and Family Services Plan (CFSP) for that systemic factor. The overall rating for the systemic factors is based on the ratings for the individual items incorporated in the systemic factor. For any given systemic factor, a State is rated as being either “in substantial conformity” with that factor (a score of 3 or 4) or “not in substantial conformity” with that factor (a score of 1 or 2). Specific requirements for each rating are shown in the table below.

Rating the Systemic Factor

Not in Substantial Conformity		In Substantial Conformity	
1	2	3	4
None of the CFSP or program requirements is in place.	Some or all of the CFSP or program requirements are in place, but more than one of the requirements fail to function as described in each requirement.	All of the CFSP or program requirements are in place, and no more than one of the requirements fails to function as described in each requirement.	All of the CFSP or program requirements are in place and functioning as described in each requirement.

It should be noted that ratings for the items included in each systemic factor are not based on single comments from an individual stakeholder; however, these comments are included in the report when they provide important insights or clarification on the State’s performance on a particular systemic factor.

If a State is not in substantial conformity with a particular systemic factor, then that factor must be addressed in the State’s PIP. For each systemic factor, information is provided about the State’s performance in its first CFSR as well as in the current CFSR. If the systemic factor was part of the State’s PIP, the key concerns addressed in the PIP and the strategies for assessing those concerns are noted.

IV. STATEWIDE INFORMATION SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	<u>4X</u>

Status of Statewide Information System

Tennessee is in substantial conformity with the systemic factor of Statewide Information System. The State was in substantial conformity with this factor in its 2002 CFSR and was not required to address this factor in the PIP.

Specific findings in the 2008 CFSR for the item included in this systemic factor and the reason for the item rating are presented below.

Item 24. The State is operating a statewide information system that, at a minimum, can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care

 X Strength _____ Area Needing Improvement

Item 24 is rated as a Strength because the State’s information system can identify the status, demographic characteristics, location, and goals for the placement of each child in foster care.

This item was rated as a Strength in the 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, although the State does not yet operate a statewide child welfare automated system, the State maintains a statewide system known as TN Kids. TN Kids was implemented in September 1999; it primarily supported DCS’s intake and referral functions and was accessible by only a few data entry personnel in each region. In the following year,

additional modules were implemented, and training for all DCS employees was conducted. Since that time numerous enhancements have been made to the system.

According to the Statewide Assessment, the TN Kids child welfare system helps DCS attain safety, permanency, and well-being for children who are in State custody, or who are at risk of entering custody, and their families. DCS policy requires that staff document all casework activities in TN Kids. There are several legacy systems within the State that are operated and maintained to support specific programs and operations. According to the Statewide Assessment, some of the legacy systems do not interface with each other and/or the TN Kids application. However, with the information in TN Kids and the legacy systems, the State can readily access the status, demographic characteristics, location, and permanency goals for every child who is or has been in foster care. The system provides the necessary data to meet the reporting requirements of the Adoption and Foster Care Analysis and Reporting System, the National Child Abuse and Neglect Data System, and the State.

Additionally, the system has the capacity to track provider financial and contractual information; track special placement approvals; and can distinguish between CPS cases and MRS cases. Recent health services enhancements added the capacity to track specific health-care providers and identified and completed health services.

Some aspects of TN Kids are available to external stakeholders:

- Web-based CPS Intake is available to law enforcement, educators, and medical practitioners as a way to submit electronic CPS referrals to DCS.
- TN Kids Case Recordings is a web-enabled interface that allows private providers to record information about face-to-face visits with DCS clients.
- DCS staff and private provider staff use the system to report serious incidents that affect children in custody.

As reported in the Statewide Assessment, TN Kids is also used for planning and management both at Central Office and in the regions. Case characteristics and experiences can be captured and displayed in various reports that are available to State and regional staff. Canned reports provide real time or recent data used by managers on a daily, weekly, or monthly basis to monitor case assignments, permanency plans, placements, and many of the Federal and key Brian A. performance indicators. Reports produced from monthly TN Kids extracts supplement those available directly from the application.

Stakeholder Interview Information

According to stakeholders at the State level commenting on this item during the onsite CFSR, TN Kids, the current data system, has been in use since 1999. Stakeholders at the three review sites reported that the system is adequate and maintains

demographics, placement locations, permanency goals, and legal status of children in foster care. Stakeholders also indicated that the information is generally entered timely and accurately. Additionally, the system, according to Bradley County stakeholders, has a number of edits that catch inaccurate data, including that TN Kids will not allow a case to be opened without demographics on the child.

According to stakeholders at the three review sites and at the State level, all placement changes must be entered into TN Kids within 24 hours of the change. Shelby County stakeholders reported that Shelby County staff must enter changes into TN Kids within 10 hours. Providers, according to stakeholders at the three review sites and at the State level, are required to enter placement changes within 24 hours of the change into a web-interface with TN Kids. DCS receives a notice of the change and then enters the placement change into TN Kids within 24 hours. Additionally, according to stakeholders, child placing providers enter case contacts, e.g. child/parent visits, into TN Kids. A 2007 enhancement allows medical and behavioral information to be entered into TN Kids by the caseworker or medical personnel.

According to stakeholders at the State level, data reports are sent out to the counties and regions on a regular basis. There are three sets of outcome measures:

- Federal
- Brian A. measures produced quarterly
- Regional outcomes based on entry cohorts

Detailed and discrete data on caseworkers' visits with children are produced twice a month, which allows team leaders to know the status of caseworkers' visits.

Additionally, there are Crystal computer application reports that can be accessed in TN Kids. The State, according to State-level stakeholders, built a data warehouse and created a "dashboard" on resource homes to allow easy access to data, such as the number of resource homes and which children are placed in the homes. Central Office, according to State-level stakeholders, tracks who accesses the reports.

Stakeholders at the three review sites reported that the management reports and alerts generated by TN Kids are beneficial. Additionally, Bradley County and Putnam County stakeholders indicated the "mega report," which provides information on where children are placed throughout the region, is a helpful management tool. This report is sent from Central Office at the beginning, middle, and end of each month. Additionally, the report details the number of children entering and exiting foster care placement. According to Putnam County stakeholders, the mega report is used by Putnam County analysts to generate a

dashboard report, and the results in the mega report are used to generate special studies or follow-up analyses. One example cited was of a special report that provided information about placement proximity that was subsequently used by supervisors to target recruitment efforts for resource families.

Stakeholders at the State level reported that SDM and FFAs are manual processes and not built into TN Kids.

According to stakeholders at the State level, new caseworkers have 3 to 5 days of classroom training for each TN Kids module pertinent to their specialty.

V. CASE REVIEW SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
		1	<u>2X</u>	3

Status of Case Review System

Tennessee is not in substantial conformity with the systemic factor of Case Review System. The State was not in substantial conformity with this systemic factor in its 2002 CFSR and was required to address this factor in the PIP.

Key Concerns From the 2002 CFSR

Key concerns identified during the 2002 CFSR were the following:

- DCS had a process in place for a written case plan to be jointly developed by the child and parents; however, the information gathered during the review indicated that many children and parents were not involved in the development of the case plan.
- DCS had a process in place for TPR but the information gathered during the review indicated that the State was not consistently seeking TPR in accordance with ASFA.

- DCS had a process in place for foster parents, pre-adoptive parents, and relative caregivers to be notified of and have an opportunity to be heard in any review or hearing; however, the information gathered during the review indicated that parties do not always receive these notices or do not receive them timely.

The State implemented the following PIP strategies to address concerns related to Case Review System:

- The State implemented the Engaging Families Initiative to utilize full family involvement in permanency planning to move more quickly to permanency and to ensure preservation of relationships.
- The State drafted and implemented legal risk policy to address the number of cases presented to the court as exceptions to reasonable efforts in order to expedite children’s movement to permanent homes.
- The State expedited the process to finalize adoptions by having the DCS attorney work with the adoptive parent’s attorney to get the case on the court schedule.
- The TPR process was expedited by the Tennessee Supreme Court adopting Rule 8A.
- The State put a monitoring plan in place comparing TPR cases prior to Rule 8A and the handling of TPR cases after the court’s adoption of the rule.

The State met its target goals for this systemic factor by the end of the PIP implementation period.

Specific findings of the 2008 CFSR for each item included in this systemic factor and the reasons for item ratings are presented below.

Item 25. The State provides a process that ensures that each child has a written case plan to be developed jointly with the child’s parent(s) that includes the required provisions

Strength Area Needing Improvement

Item 25 is rated as an ANI because parental involvement in the case planning process is inconsistent. Data from the Onsite Review indicate that parents and children were involved in case planning in only 39 percent of the 62 applicable cases. Additionally, data from the State’s QSR indicate that 27 percent of the cases reviewed in the 2007-2008 review scored acceptably on the Child and Family Permanency Planning indicator, which includes consideration of whether the plan was developed by the CFT. This item was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

As reported in the Statewide Assessment, since the 2002 CFSR, DCS has placed emphasis on the CFT process to improve the participation of the child and the family in the development of the written case plan/permanency plan.

According to the Statewide Assessment, all children in DCS custody must have a permanency plan approved by the court within 60 days of entering foster care. The plan is developed in collaboration with the family and other team members in an Initial Permanency Planning CFTM. The Statewide Assessment reports that the planning process allows family members to maintain personal responsibility and respect throughout the process.

The permanency plan includes information about the risks, behaviors, and/or conditions that led to the child entering custody and addresses through action plans how to achieve permanency. The action plans include child safety issues, community risk issues, educational and behavioral issues, medical issues, and family functioning issues and have timeframes for expected achievement of the goals and the responsible party for ensuring that certain actions take place. State law requires that DCS prepare a new plan at least every 12 months until permanency is achieved or the child reaches the age of majority. DCS uses the Foster Care Review and quarterly progress reports to evaluate the progress and continued needs of the family.

The permanency plan has been designed to follow the flow of the Functional Assessment processes that allow caseworkers to better translate the needs and strengths of the family. Additionally, the Interdependent Living Plan, which is developed to create goals that will help youth transition into adulthood, has been incorporated into the permanency plan. It also ensures that the youth's voice is a part of the planning process; their input is required. According to the Statewide Assessment, generally children age 6 and older are included in service planning unless there is clinical justification for not doing so.

The data from the QSR indicate 27 percent of the cases reviewed in the 2007-2008 review scored acceptably on the Child and Family Permanency Planning indicator, which includes consideration of whether the plan was developed by the CFT.

As reported in the Statewide Assessment, QSR results indicate that permanency plans are not "living" documents adapted when circumstances for the child and family change but rather, required documents updated at prescribed intervals. Plan development often includes what will be needed to get the child home or to permanency but does not always include what it will take to keep the child in the home or with the permanency resource, as evidenced by numerous failed trial home visits.

Stakeholder Interview Information

Stakeholders at the three review sites commenting on this item during the onsite CFSR suggested that DCS prepares case plans for children in foster care and receiving in-home services and that case plans are developed in a timely manner. Furthermore, stakeholders reported family involvement in case planning through the CFTM and the FSTM. Stakeholders indicated that families are generally actively involved in the development of the case plan and that the plans are usually individualized and effective. Several stakeholders indicated that DCS is deficient in engaging noncustodial parents in case planning at the beginning of the case. Many stakeholders reported that the quality of the CFTM and the case plans have improved in recent years.

According to stakeholders, case plans are required to be completed in 30 days and updated every 6 months. However, according to stakeholders in Shelby County, caseworkers are required to update case plans every 5 months. The timeliness of case plans is tracked in TN Kids reports. CFTM facilitators are responsible for tracking CFTM and the completion of the case plan.

According to stakeholders across the sites and at the State level, involvement of youth in case planning varies. Many stakeholders reported that youth are actively involved in the case planning process. However, others indicated that youth attend CFTM; however, their input is not solicited.

Several stakeholders across the sites indicated that CFTMs would be more effective and less intimidating to parents if conducted somewhere other than the DCS office. Stakeholders in Putnam County reported that CFTMs are effective and productive.

Item 26. The State provides a process for the periodic review of the status of each child no less frequently than once every 6 months, either by a court or by administrative review

Strength **Area Needing Improvement**

Item 26 is rated as a Strength because each child in foster care has a periodic review at least every 6 months either by the court or the FCRB. Stakeholder information from the Onsite Review indicates that reviews are generally held timely, which supports the information provided in the Statewide Assessment. This item was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, State law requires that the local Juvenile Court or the FCRB review the progress of the permanency plan for each child in foster care within 90 calendar days of the date the child entered care and no less than every 6

months thereafter. Additionally, DCS requires that quarterly progress report forms be completed every 90 calendar days from the date of custody. The quarterly progress report provides the court with a description of how the child is doing, including the quality of visitation, educational level, independent living, and any medical/dental/treatment needs. It also ensures that diligent efforts are being made to locate other relatives. The court reviews for progress on action steps and outcomes from the permanency plan and makes recommendations for next steps. Caseworkers secure a written report of the findings of the review and include it in the child's case file. Report information and review dates are entered into TN Kids.

There is inconsistency across the State regarding how judges utilize the findings of the FCRBs. Some judges place a high value on what is recommended, but others do not consider FCRB findings relevant. Additionally, the Statewide Assessment reports that some FCRBs are more effective than others. Furthermore, there is confusion in some locations between DCS and court staff about who bears the responsibility and authority over FCRBs. In some counties, the court does not exercise any control or authority over the FCRB, including appointment of members. The department has partnered with the Administrative Office of the Courts (AOC) to bring some consistency through trainings to members of the review boards and to DCS staff.

As reported in the Statewide Assessment, DCS policy allows caseworkers to exercise discretion in following the recommendations of the FCRB, which, according to the Statewide Assessment, makes it difficult for all parties to place value in the FCRB's assessment and recommendations. However, caseworkers are encouraged to respond to recommendations made by the FCRBs because they are an extension of the Juvenile Court designed to assist the court with the high volume of cases that must be reviewed annually.

Stakeholder Interview Information

According to stakeholders at the State level commenting on this item during the Onsite Review, DCS attorneys schedule reviews with the court every 6 months. The cases are heard either by the FCRB or the court. According to stakeholders, about 10 counties in the State do not have an FCRB, therefore, the court in those counties are required to conduct the 6-month review. It was reported by stakeholders that in some counties the FCRB and the court both conduct a 6-month review.

Some stakeholders at the State level indicated that recommendations of FCRBs are not considered binding or useful and that FCRBs are viewed as ineffective. Stakeholders explained that State law mandates FCRBs, and the CIP is providing training to improve the consistency of the FCRBs.

According to stakeholders in Bradley County, the FCRB conducts the 90-day review, the 6-month review, and the court conducts the 12-month permanency hearing. The reviews are usually timely. The reviews, according to stakeholders, are

generally scheduled 3 to 4 weeks early, and the FCRB can request to review a case more frequently. The judge, according to stakeholders, usually sees FCRB recommendations, but views the FCRB as operating primarily in name only. The reviews, according to stakeholders, are generally thorough and effective. However, it was reported that heavy caseloads sometimes affect the caseworkers' preparations for the 6-month review.

According to Putnam County stakeholders interviewed during the onsite CFSR, the FCRB reviews cases 3 months after the child enters care and every 6 months thereafter. The cases may be reviewed more frequently if the circumstances of the case warrant. The court officer works with the DCS court liaison to ensure reviews are scheduled timely. The court liaison is responsible for notifying the required participants. A summary report is prepared by the caseworker prior to the FCRB. The FCRB, described by stakeholders as helpful and thorough, prepares a summary of the review findings. The summary is forwarded to the judge. The judge, however, does not review the FCRB or the report of the court-appointed special advocate (CASA) unless both attorneys approve. The judge in Putnam County, according to stakeholders, views these reports as ex parte communication; therefore, he generally relies only on the information presented in the court. In addition to the FCRB, cases are reviewed by the court every 6 months. According to stakeholders in Putnam County, the FCRB is very active and often serves as an advocate for the child and/or families.

According to Shelby County stakeholders, the FCRB reviews cases every 6 months. The FCRB hears an average of 15 to 18 cases once a week in a 3-hour timeframe. Stakeholders reported that DCS provides the FCRB with a summary of the case. If the FCRB denies the plan, the case is sent to the referee; however, according to stakeholders, the court does not know the case was sent back by FCRB. According to stakeholders, the FCRB tries to move cases to permanency. Additionally, the court conducts periodic and 12-month reviews that are full evidentiary reviews. DJJ cases are reviewed by the court every 6 months.

Some Shelby County stakeholders indicated that participation of children, parents, and foster parents depends on notification. Stakeholders expressed that if families are not notified this may cause a delay in the court hearing and that notification does not always occur timely. However, all parties present are engaged by the court. State law requires that children be in court, but the judge may grant an exception based on the child's age or what is in the best interests of the child.

Bradley County stakeholders reported that DJJ case plans are revised at 6 months and then every 3 months thereafter. The DJJ Review Board generally reviews cases every 3 months and frequently makes recommendations regarding mental health, drug and alcohol, and educational needs. Putnam County stakeholders reported that timely judicial reviews are conducted on DJJ cases at 3 months and then every 6 months thereafter.

Some stakeholders in Putnam County expressed frustration with the lack of interaction the guardians *ad litem* (GALs) have with the children they are assigned to represent.

Item 27. The State provides a process that ensures that each child in foster care under the supervision of the State has a permanency hearing in a qualified court or administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter

 X Strength _____ Area Needing Improvement

Item 27 is rated as a Strength because each child in foster care has a permanency hearing in a qualified court or by an administrative body no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter. Information from the Statewide Assessment and stakeholder interviews state that permanency hearings are held timely. This item also was rated as a Strength in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, permanency plans must be approved by the court within 60 calendar days of the date a child enters foster care. The court is required by law to review the requirements, goals, and progress on the permanency plan of each child in State custody. Following the ratification of the permanency plan, the court holds a permanency hearing within 12 months of the child entering care and every 12 months thereafter until permanency is achieved.

The purpose of permanency hearings is to review the appropriateness of and the progress in achieving the established goal. Permanency hearings also provide an opportunity to review services provided to the child and/or family. Outcomes of the hearings are documented in the child’s case record and entered into TN Kids.

The CIP conducts a Legal Advocacy in Child Dependency and Termination Proceedings training in which permanency hearings are addressed. The content of the training focuses on the significance of the permanency hearing, including emphasis on the fact that it is to be a full evidentiary hearing. Specific detail is given as to the roles and responsibilities of both the parent’s attorney and the GAL.

According to the Statewide Assessment, in addition to running regular reports to track compliance with timely completion and ratification of permanency plans, TN Kids tracks dates of permanency hearings but does not run regular reports on this. As reported in the Statewide Assessment, there is a gap in recent data on many of the issues raised in this item.

Although by DCS policy, permanency plans and other documents are developed for DJJ Youth Development Center (YDC) youth, the permanency plans for children/youth placed in YDCs are not submitted or reviewed by the court unless the court issues a directive. When a youth placed in YDC is released and/or stepped down, a permanency plan must be completed and approved by the court within 60 calendar days of the date of step down.

Stakeholder Interview Information

According to stakeholders in Putnam County and at the State level commenting on this item during the Onsite Review, DCS attorneys work closely with the courts to schedule permanency hearings every 12 months. Stakeholders at the State level expressed the opinion that the increased number of DCS attorneys has improved the ability to achieve permanency in a timely manner. Additionally, stakeholders reported that relationships with the courts have improved in recent years. DCS and the courts have not always agreed on the need to establish permanency for DJJ cases; however, the State has seen improvement in this area.

The State, according to stakeholders in Putnam County and at the State level, recently established new guidelines for permanency hearings that require children to attend. The CIP has conducted training on the requirement for children to be present at the hearings.

According to stakeholders in Bradley County, permanency hearings are timely due in part to frequent court hearings on each case, monitoring reports, and reminders from legal support staff. Stakeholders described permanency hearings as effective in moving the case to permanency. Stakeholders expressed the opinion that although most caseworkers are adequately prepared for permanency hearings, some caseworkers do not appear organized or ready to present testimony. The court in Bradley County reviews cases involving older youth every 6 months.

According to stakeholders in Putnam County commenting on this item during the Onsite Review, permanency hearings are held annually, are timely, and are generally effective. Permanency hearings are scheduled 9 months in advance. The court explains to the parents the limited time in which to establish permanency. According to stakeholders in Putnam County, the region does a good job of moving children toward permanency in a timely manner, which has contributed to stability of staff.

Shelby County stakeholders indicated that in terms of procedure, the court and DCS do not see any difference in the 6-month review and the 12-month permanency hearing. However, the 12-month permanency hearing is conducted by the referee and is a full evidentiary hearing in which the progress and appropriateness of the child's goal is reviewed. When there are delays or

continuance it is generally due to case plans not being submitted to the court, the family not being notified, or the caseworkers not being prepared to proceed.

Although the majority of stakeholders in Bradley County and Putnam County expressed the opinion that permanency hearings are effective, some stakeholders in these counties reported concerns about the time allotted for the court to hear the cases. Stakeholders in Bradley County reported that the judge has one afternoon per week to hear dependency and termination cases, which does not allow the judge to look deeply into each case. The effectiveness of permanency hearings in Putnam County is challenging due to the large number of cases. As a result of the large court dockets, it is more difficult for the court to address the child's individual needs. Additionally, Shelby County stakeholders reported that permanency may be affected by court continuances and overloaded court dockets.

Item 28. The State provides a process for termination of parental rights proceedings in accordance with the provisions of the Adoption and Safe Families Act

Strength Area Needing Improvement

Item 28 is rated as an ANI because data and information examined during the CFSR process to determine if the State has a process in place for TPR is not clear and is sometimes conflicting. Stakeholder interviews indicate that the State has an effective process in place for filing for TPR when a child has been in foster care for 15 of 22 months. However, at the time of the Statewide Assessment, there were 500 children in custody for 15 months or longer who did not have a TPR filed. Case review findings from the Onsite Review indicated that at the time of the onsite CFSR, 28 of the 40 children in the foster care cases reviewed had been in foster care for 15 of the most recent 22 months. ASFA requirements were met in 18 (64 percent) of the 28 cases for which the requirements were applicable. This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS has several data sources tracking TPR-related issues. The sources and findings as reported in the Statewide Assessment are summarized below:

- Data from the Statewide Assessment indicate the number of children in custody for more than 15 months for whom TPR has not been filed has been reduced from more than 1,900 in November 2006 to 836 as of June 30, 2007. At the time of the Statewide Assessment, there were fewer than 500 children in custody for more than 15 months for whom TPR had not been filed.

- The Permanency Plan with a goal of Adoption TPR Activity Compliance report monitors all permanency plans with a sole goal of adoption until full guardianship and adoption is achieved. For the period of May 1, 2007, through April 30, 2008, for all children with a sole goal of adoption established for 3 or more months, 81 percent had a TPR filed within 3 months.
- TN Kids automatically tracks the length of custodial episodes for each child in State custody and alerts the caseworker when the child has remained in foster care for 13 months with no TPR.

According to the Statewide Assessment, DCS policies and procedures and the Adoption Best Practice Manual have been created or revised to ensure that DCS has a clear process for TPR and to ensure that the provisions set forth in ASFA are met by DCS.

In addition to DCS policy, Brian A. sets guidelines for TPR:

- Within 90 days of the permanency goal changing to adoption, the DCS attorney should file the TPR petition.
- DCS should take all reasonable steps to ensure that the date of the trial court order granting full guardianship is within 8 months of the filing of the TPR and that the date of the finalization of the adoption or the date the child achieves permanent guardianship is within 12 months of full guardianship.
- All children who have been in custody for 15 months or more with no TPR petition filed shall be reviewed by the commissioner or her designee.

Stakeholder Interview Information

According to stakeholders at the State level commenting on this item during the Onsite Review, some counties are experiencing backlogs of TPR hearings.

Stakeholders at the State level reported that 500 children who have been in foster care 15 out of 22 months without TPR are reviewed regularly by the managing attorney and the DCS Commissioner. Additionally, according to stakeholders at the State level and in Shelby County, a report is available through TN Kids indicating all children who have been in foster care 15 out of 22 months.

Stakeholders in Shelby County and at the State level reported that compelling reasons must be documented in the case file and entered into TN Kids. Additionally, cases with compelling reasons are reviewed regularly by the Regional Administrator (RA) and the commissioner. The most common “compelling reasons” as reported by stakeholders include:

- Reunification may be imminent, and DCS wants to give parents more time.
- Reasonable efforts have not been made.

- Although a diligent search was not completed initially, the parents have now been located and time is needed for service provision.
- Parents are in treatment and need more time to complete the treatment.

According to stakeholders in Bradley County, TPR petitions are filed timely due to a process of legal review that the attorney completes on each custodial case every 6 months that assesses case progress. Additionally, caseworkers are discussing the need for a referral for TPR earlier in the case with the idea that the TPR can be withdrawn if the family makes acceptable progress. The RA receives a monthly report of progress toward timely filing of TPR.

Although filing for TPR is timely, stakeholders in Bradley County reported a large time gap between the filing and the actual TPR hearing. Currently, the Juvenile Court in Bradley County has a half a day a week for dependency hearings, so a TPR hearing may be spread out over several months which can greatly delay permanency for children. Bradley County stakeholders reported that although appeals and continuances occur, recently there have been fewer appeals of TPR filed. Stakeholders attributed this in part because DCS lead attorney is well prepared for the TPR process.

Putnam County stakeholders reported that the agency attorneys meet with agency supervisors to staff cases for permanency and discuss what, if any, activities need to occur to prepare a case for timely filing of TPR. Putnam County stakeholders reported that Putnam County DCS is very effective in filing timely TPR petitions and frequently, if case circumstances warrant, file for TPR prior to 15 months. However, some stakeholders voiced concerns that in some cases when adjudication has been delayed, parents may not be afforded ample time to work on the case plan goals prior to the State filing for TPR. Additionally, compelling reasons are appropriately documented when the decision is made not to file for TPR. Putnam County stakeholders reported that there are not a significant number of TPR cases going through the appeal process.

According to Shelby County stakeholders, Shelby County DCS is effective in filing for TPR because all documentation for compelling reasons not to file TPR cases is reviewed by the General Counsel. If the agency has provided good documentation, the case is able to move forward to TPR. Barriers to timely filing of TPR are related to lack of diligent search for fathers and lack of reasonable efforts.

As reported by stakeholders at the State level, the State has focused on ensuring legal representation for all parents and GALs for all children in foster care.

Item 29. The State provides a process for foster parents, pre-adoptive parents, and relative caregivers of children in foster care to be notified of, and have an opportunity to be heard in, any review or hearing held with respect to the child

 Strength X Area Needing Improvement

Item 29 is rated as an ANI because foster parents, pre-adoptive parents, and relative caregivers of children are not consistently provided notification of reviews and hearings, and the opportunity for these parties to be heard in these reviews and hearings is not consistent across the State.

This item was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS policy requires the caseworker to provide notification of case reviews and hearings to the parent, non-relative resource parents, kinship care resource parents, GAL, the parents' attorneys, and the child, if the child is age 6 or older and it is appropriate for the child to participate in the case reviews. Notice must be provided to all team members and documented in TN Kids at least 7 days before the hearing if done by phone or in person and 10 days in advance if notice is given by mail. Additionally, effective July 1, 2007, each court order should include documentation of whether DCS provided notification of hearings to the resource parents, prospective adoptive parents, or a relative providing care for the child.

Data gathered during DCS Exit Surveys conducted January to June 2007 with resource parents whose homes were closed during the first 6 months of 2007 strongly indicate that resource parents are receiving the notification of hearings and reviews. According to the survey, 74.6 percent of resource parents who responded reported that they attended CFTMs. Additionally, 66.4 percent report that they were given copies of the permanency plan. Although the Statewide Assessment did not indicate the percentage, it reported that some resource parents reported that they were in attendance at the hearings, but the court would not let them speak or be heard.

Stakeholder Interview Information

According to stakeholders at the three review sites and at the State level commenting on this item during the Onsite Review, DCS staff are responsible for providing notification to relatives, foster parents, and adoptive parents of case reviews and permanency hearings.

Bradley County stakeholders indicated that foster parents are notified of reviews and hearings by the caseworker via written notification and/or telephone calls and that the consistency of notification has improved in recent years. Stakeholders in Putnam County varied in their opinion of notification practices. Some stakeholders reported that caseworkers are consistently providing notification to caregivers. However, other stakeholders indicated notification depends upon the assigned caseworker. Some Putnam County stakeholders reported that caregiver notification appears far more consistent in regard to FCRB reviews and internal meetings such as CFTMs, than for judicial proceedings. Stakeholders in Shelby County indicated that notification of hearings is inconsistent. Notification, when it occurs, is frequently by telephone and generally only a few days prior to the hearing.

According to State-level stakeholders, foster parents are encouraged to participate in all CFTM, FCRB, and court hearings for children in their care. Except for some Putnam County stakeholders, the majority of stakeholders across the sites commenting on this item during the Onsite Review indicated that when foster parents attend hearings or the FCRB they are given the opportunity to speak.

VI. QUALITY ASSURANCE SYSTEM

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	<u>4X</u>

Status of Quality Assurance System

Tennessee is in substantial conformity with the systemic factor of QA System. The State was in substantial conformity with this systemic factor in its 2002 CFSR and was not required to address this factor in the PIP.

Specific findings of the 2008 CFSR for each item included in this systemic factor are presented below.

Item 30. The State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of the children

 X Strength Area Needing Improvement

Item 30 is rated as a Strength because the State has developed and implemented standards to ensure that children in foster care are provided quality services that protect the safety and health of children.

This item also was rated as a Strength in the State’s 2002 CFSR.

Statewide Assessment

According to the Statewide Assessment, DCS has put in place a process to monitor and evaluate the performance of providers who have contracts to deliver services to children and families through the E&M Division of the Office of Performance and Quality Improvement (PQI). These monitoring activities provide protection to the children served by these agencies by establishing and enforcing standards that provide for the children’s basic health, safety, and well-being. The primary activities related to this monitoring are carried out through the Program Accountability Review (PAR) and Licensure teams.

The PAR reviews the following:

- A subrecipient’s compliance with terms of the contractual agreement and the requirements for administering the program
- Adherence to applicable laws and regulations
- Measures of progress toward stated results and outcomes
- Financial management and the accounting system

Additionally, PAR randomly reviews private provider employee files as a part of its contract monitoring functions. PAR monitors for specified training topics and for completion of the requisite number of training hours.

According to the Statewide Assessment, licensing standards are developed by committee and promulgated through public hearings and review by the legislature.

As reported in the Statewide Assessment, the Placement Quality Team (PQT) is a cross-functional CQI team of State staff from multiple DCS divisions who meet regularly to discuss provider related issues. PQT can provide technical support to a provider to improve performance in specific areas and can sanction providers if performance places children in the program at risk.

Findings regarding provider performance are addressed through corrective action plans that are managed by a subgroup of the PQT.

Stakeholder Interview Information

Based on information provided by Shelby County and State-level stakeholders during the onsite CFSR, the State has developed and implemented standards to ensure that children in foster care are provided quality services that protect their safety and health. The practice model established by the State articulates a set of standards that follow the Federal and State requirements and these standards are communicated to all foster care providers. The stakeholders reported that the PQT monitors placements and has the authority to sanction providers if not in compliance with State standards. The State also has an M.S.W. in every region to review cases. Additionally, numerous reviews are conducted by the commissioner and her staff.

Stakeholders in Bradley County reported that the CPS team and QSR look closely at the safety of children. A registered nurse and the QA team monitor cases to ensure children are receiving appropriate medical treatment. Additionally, the QA team addresses the safety of children and compliance with providers and ensures the implementation and completion of provider corrective action plans. These stakeholders also reported that a psychologist always reviews the cases of children receiving levels 1, 3, and 4 mental health services. The COE conducts weekly consultation with the psychiatric hospital's team. Additionally, stakeholders reported that the Private Provider Policy Manual addresses DCS expectations pertaining to safety, health, and permanency. As reported by State-level stakeholders, a section of the monitoring report under Brian A. requires the establishment of standards.

As reported by Putnam County stakeholders, Resource Parent Specialists visit DCS foster homes monthly if children are placed in the home and quarterly if there are no children placed in the home. The Resource Parent Specialists evaluate the physical conditions of the homes. Stakeholders indicated that private agencies and DCS participate in the Cross Functional Team, which is a product of CQI, and offers the opportunity to meet to discuss Strengths and ANIs. Stakeholders stated that the Cross Functional Teams are very helpful.

Shelby County stakeholders reported that Shelby County DCS has a Utilization Team that conducts reviews to monitor many private providers' contracts and the utilization of services. The assessment process compares the child's identified needs with services being provided and measure progress. These stakeholders also indicated that performance-based contracting is another means of measuring safety of children in care. The contracts are outcome driven with incentives. According to Shelby County stakeholders, caseworkers have monthly contacts with foster parents and children in all types of foster care placements.

Stakeholders in Bradley County and Shelby County reported that the Well-Being Unit meets weekly to provide feedback to staff on cases.

Item 31. The State is operating an identifiable quality assurance system that is in place in the jurisdictions where the services included in the CFSP are provided, evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates program improvement measures implemented

 X Strength Area Needing Improvement

Item 31 is rated as a Strength because the State is operating a QA system that evaluates the quality of services, identifies strengths and needs of the service delivery system, provides relevant reports, and evaluates implemented program improvement measures. This item also was rated as Strength in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS, through the Office of PQI, has a QA system designed to evaluate best practice casework, implement improvement strategies, and monitor performance. The QSR and the CQI process are the primary means of QA.

As reported in the Statewide Assessment, it is DCS policy to conduct a QSR for each region annually. The E&M Division within the Office of PQI coordinates the annual QSR for each of the 12 DCS regions. The cases represent a random, stratified sample that includes more than 200 dependent/neglected children drawn from each region of the State, as well as cases involving delinquent children. These QSRs are conducted by reviewers from a cross-section of stakeholders, including Central Office staff, regional staff, and staff from outside agencies such as the Tennessee Commission on Children and Youth (TCCY) and the Tennessee Center for Child Welfare (TCCW).

When the annual regional QSR is completed, an exit discussion is led by the QSR review team that provides regional staff with preliminary feedback regarding the results of the review. Once the data have been checked for accuracy, a final report is shared with the commissioner, the Central Office core leadership team, the RA, TCCY, and TCCW. The final report presents the scores for all of the service indicators and compares them to prior QSR results. In addition, the report includes story narratives that summarize the findings from the specific cases that were reviewed. Additionally, each region is expected to conduct “mini-QSRs” on an ongoing basis as part of the CQI process.

Other QA procedures also are in place:

- Monthly supervisory reviews on CPS cases to assess compliance with response time, reduction of risk factors, and closure or transition of the case
- Case Process Reviews to assess the accuracy, completeness, and timeliness of the activities and documentation of the casework

Stakeholder Interview Information

Stakeholders at the State level commenting on this item during the onsite CFSR reported that the Office of PQI is responsible for all QA functions. The Office of PQI includes the E&M Division and the Policy, Planning, and Performance Division.

The primary QA function, as reported by stakeholders at the three review sites and at the State level, is the annual QSR. Case files are reviewed and external stakeholders, including older youth and parents, provide input into the QSR process. After the Onsite Review, there is a closing conference and a comprehensive report that includes aggregate data from the regional office and stories that describe the cases that were reviewed. From the QSR results, DCS develops priority areas for improvement. Action steps are created and implemented to address the priority areas. The reviews, according to State-level stakeholders, serve as an annual report card for DCS.

These stakeholders reported that DCS is in the third year of QSR process and scores have been improving. According to stakeholders at the State level, the regional CQI coordinator receives data reports from the QSR. Data reports are used to identify ANIs, to identify the barriers, to develop tools for skill building, and to track progress. Additionally, the Tennessee Social Work Education Consortium receives copies of QSR results and stories and uses this information to revise training curriculum as warranted. In addition to the annual QSRs, stakeholders reported that each region also conducts two “mini-QSRs” that mirror the State QSR.

Stakeholders at the three review sites expressed mixed opinions about the usefulness of the review process to caseworkers. Some stakeholders expressed the opinion that the QSR process provides constructive feedback to caseworkers, and that caseworkers find the reviews beneficial because recommendations are made on cases that will improve their ability to work better with families. Other stakeholders, however, indicated that caseworkers find the reviews challenging and frustrating because they do not receive feedback. Some stakeholders indicated that caseworkers may or may not receive the aggregate data from their supervisors.

Another QA function in Tennessee is the CQI teams. There are local and regional CQI teams and a State CQI team. The primary function of the CQI teams, according to stakeholders in Bradley County and at the State level, is to use the available data to evaluate underlying issues and trends and determine if there are actual practice issues or data issues. Stakeholders in Shelby County reported that the findings from the CQI are used to mentor and train staff as well as evaluate staff practice.

Stakeholders in Bradley County and Putnam County and at the State level reported that Case Plan Reviews are also utilized by DCS to evaluate the quality of services provided. The supervisor/team leader is required to review 10 percent of the cases under their supervision. The review instrument is designed to review case organization, documentation, and form completion. Additionally, State CQI conducts a reliability process in which a second level review is conducted on the cases reviewed by the supervisor/team leader.

Stakeholders reported that the child abuse review team reviews non-severe cases on a monthly basis as mandated by State statute. Additionally the CPIT reviews more severe indicated cases.

IV. STAFF AND PROVIDER TRAINING

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	3	<u>4X</u>

Status of Staff and Provider Training

Tennessee is in substantial conformity with the systemic factor of Staff and Provider Training. The State was not in substantial conformity with this systemic factor in its 2002 CFSR and was required to address the factor in its PIP.

Key Concerns From the 2002 CFSR

The following key concerns were identified in the 2002 CFSR:

- Although DCS had established a new training division, the initial training did not sufficiently prepare staff for the work they are required to perform.
- Ongoing training was not sufficiently comprehensive to meet the needs of staff and needed to be strengthened in subject areas such as substance abuse and cultural competency.

To address these concerns, Tennessee implemented the following strategies in its PIP:

- The State implemented a competency and skills based pre-service training program based on the Standards of Professional Practice Manual.
- The State developed and began delivering competency based in-service training.
- The State revised and implemented a comprehensive database system that monitors and tracks the training activities and hours for all DCS employees.

The State met its goals for this systemic factor by the end of its PIP implementation period.

Specific findings of the 2008 CFSR for each item included in this systemic factor are presented below.

Item 32. The State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services

 X **Strength** **Area Needing Improvement**

Item 32 is rated as a Strength because the State is operating a staff development and training program that supports the goals and objectives in the CFSP, addresses services provided under titles IV-B and IV-E, and provides initial training for all staff who deliver these services. This item was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS collaborates with the Tennessee Social Work Education Consortium to provide initial training to direct service staff. The consortium selected Middle Tennessee State University (MTSU) to be the lead university to assume fiduciary responsibility of managing the resources given to address DCS staff training needs, as well as recruit undergraduate social work majors for employment with DCS through a stipend program. MTSU subsequently established the TCCW to coordinate the management of the consortium as well as the development, delivery, and evaluation of

professional development. Currently, 11 of the university partners within the consortium have a sub-contractual relationship with the TCCW to provide training to the department's direct service staff and resource parents.

The TCCW offers a nine-course New Case Manager Certification program. The certification program is a 10- to 12-week course consisting of more than 160 hours of training with four classroom courses and five on-the-job training (OJT) courses. Caseworkers, according to the Statewide Assessment, are prepared to work effectively with families and children. The training includes the following:

- Introduction to DCS's Guiding Principles and approach to practice, including the Practice Wheel
- Overview of the department's philosophy
- Skill development, including the opportunity to practice each skill, in the following areas:
 - Family-centered practice, including cultural responsiveness
 - Conducting comprehensive family assessments
 - Building and supporting the family team
 - All aspects of case planning, including locating appropriate services/resources
- Open discussion and reflection on the caseworker's growth and development in skill areas
- Introduction to DCS and Federal regulations, policies, and procedures

The five OJT courses are coordinated by OJT coaches located in each of the 12 regions and are designed to transfer the knowledge and skills from the classroom to direct practice opportunities in the field.

A Case Manager Team Meeting (CMTM) is held with the new caseworker and the caseworker's direct supervisor, the OJT coach, an assigned mentor, and the assigned classroom trainer. In one or two regions where turnover is high, the OJT coach has had to conduct group CMTMs. The caseworker identifies the strengths and skills he/she brings to the job as well as areas for development. Members of the CMTM develop an activity plan that outlines what practice activities the caseworker will be participating in after completion of each course. The new caseworker is given immediate feedback on his/her performance. The OJT coach shares observations and assessment of performance with the caseworker and the Case Manager Team develops a plan based on strengths and areas of development.

The OJT coach ensures that the new caseworker receives all necessary training, including:

- TN Kids
- Health and medical requirements in obtaining and providing health services to families
- Establishing eligibility for services
- Legal requirements

The new caseworker receives a training caseload of no more than five cases during the last course of OJT, which typically lasts 2 to 4 weeks. The work done with these five cases is closely supervised by an experienced caseworker.

The OJT coach prepares the caseworker for the final skill demonstration assessment as well as the final written knowledge examination. During the final CMTM, the new caseworker is informed as to whether or not he/she has successfully completed the certification program. At this time, the new caseworker may receive a full caseload or may be assigned a partial caseload if the supervisor feels it would be more appropriate to gradually increase the caseload. Independent caseloads are not assigned prior to successful completion of the knowledge assessment and the skills demonstration.

Additional training is required for supervisory caseworkers. New supervisors are required to take the following courses: a 9-hour course entitled Organizational Policies and Practices for Supervisors; a 6-hour web-based course entitled Performance Evaluation; and a 5-day course called Supervision Basics. Once supervisors complete their required training, they are expected to complete a minimum of 24 in-service hours a year.

Private provider staff members with case management duties are required to complete a minimum of 160 hours of pre-service training, which must mirror the DCS curriculum, as well as 80 hours of classroom instruction and 80 hours of field instruction before assignment of a full caseload. In addition, private providers must provide new supervisors 40 hours of in-service training specific to child welfare worker supervision prior to the assignment of supervisory responsibilities.

The consortium provides quarterly reports to the department on various measures, including the number of staff who complete the program and the number of staff requiring retraining, as well as impact evaluations 6 months to 1 year after training. The consortium also reports the number of successful and unsuccessful final skills demonstration and the written knowledge examinations.

Data collected from the consortium indicate that there were 401 potential caseworkers that attended initial staff training during FY 2006-07. Ninety percent of the participants successfully completed the final knowledge assessment on the first attempt, and

79 percent successfully completed both the knowledge exam and the final skills demonstration assessment on the first attempt. The average score for the final assessment was 70 percent.

Stakeholder Interview Information

Stakeholders at the three review sites and at the State level commenting on this item during the Onsite Review expressed varying opinions about the quality of new caseworker training. Some stakeholders reported that the new caseworker training is adequate to prepare caseworkers to carry out the responsibilities of their jobs. Other stakeholders, however, noted that the classroom training is unrealistic and that caseworkers learn more through OJT, mentoring, and actually performing the work. A major concern noted by a number of stakeholders across the sites is that only 1 week of training focuses on the new caseworker's assigned area of work.

Based on the information provided by stakeholders at the three review sites and at the State level, the TCCW delivers a New Case Manager Certification Program for new caseworkers in child welfare and DJJ. The program is about 260 hours long and includes 9 courses and 5 weeks of OJT. Stakeholders at the State level state that Brian A. required DCS to provide this pre-service training for all current staff. Additionally, stakeholders reported that all the tools used by DCS have specific trainings, including FAST and CANS, which are taught by FAST and CANS consultants.

New caseworkers are assigned mentors to shadow and practice skills with during OJT. Stakeholders noted that in some offices there may be a lot of new staff, and it is difficult to find an experienced caseworker to be a mentor. Also, State-level stakeholders indicated that each region has at least one OJT coach with many counties to cover, and that in counties with only one OJT coach, it can be difficult for the coach to conduct all of the observations and the mentors may need to do that.

Stakeholders at the three review sites and at the State level reported that there is a pre-test at the beginning of the training process, a competency assessment at the conclusion of each training course, and a comprehensive assessment at the end of the training course that includes a knowledge exam and a skill demonstration exam. Staff are allowed to take both sections of the comprehensive assessment several times. If they fail a re-test, training staff confer with the caseworker and supervisor to develop an individual plan, which may include remedial work, reassignment to another position, or termination. There is a CMTM at the end of OJT that includes the mentor, training staff, the OJT coach, the new caseworker, and the supervisor. The meeting is to provide the new caseworkers with feedback and to address any questions or issues.

Stakeholders at the three review sites and at the State level were consistent in reporting that new caseworkers receive five cases during Course 9 of training but cannot go out alone on a case until the successful completion of the competency assessment process.

Stakeholders at the State level reported that DJJ staff who work in YDCs and group homes receive pre-service training through the Department of Corrections (DOC) training academy. Additionally, two universities within the consortium focus on training for DJJ staff.

According to stakeholders in Bradley County, new child welfare supervisors are required to complete Supervision Basics, a 5-day course developed by the TCCW. Additionally, the supervisors must complete Department of Human Resources (DHR) online administrative training on the evaluation process and agency policy and procedures.

Item 33. The State provides for ongoing training for staff that addresses the skills and knowledge base needed to carry out their duties with regard to the services included in the CFSP

 X Strength _____ Area Needing Improvement

Item 33 is rated as a Strength because the State requires 40 hours of annual in-service training for caseworkers and supervisors. Completion of the required training is tracked by a regional training coordinator. This item was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, annual training hour requirements for DCS staff are based on job category and position titles. Management and direct service staff must attend 40 hours of in-service training annually, and support staff must attend 16 hours. Ongoing training opportunities are delivered through a variety sources. Central Office program staff and the Training Division provide internal opportunities. Regional trainers provide training to staff members transferring from one program area to another. Additionally, several computer-based trainings have been delivered to staff through the online Learning Management system.

The professional development provided by the consortium covers a variety of topics. The consortium also provides supervisor training including roles, responsibilities, and competencies of a direct service supervisor, as well as areas of supervision that relate to ethical dilemmas, personnel, and fiscal matters. The consortium provides TN Kids training, which includes a basic

course, three courses specific to job duties, and another course for the application and payment process for vendors. Currently, the consortium utilizes pre- and post-tests as tools to assess the level of knowledge gained through individual courses.

The Statewide Assessment notes that the consortium assesses training needs of local and regional direct service staff and delivers courses targeted to meet those needs. A university partner in the Northwest region of the State created a course to help caseworkers assess parenting style, as well as understand their role in helping families learn appropriate ways of dealing with child and adolescent behaviors. Another university partner provided a leadership workshop in the Southwest region.

According to the Statewide Assessment, between 2005 and 2007, the TCCW and the consortium trained a supervisor version and an experienced worker version of a certification program. The separate trainings consisted of 15 days for supervisors and 9 days for experienced workers and were attended by 2,358 experienced staff members.

As reported in the Statewide Assessment, the Training Division has several sources of data collection to determine whether agency staff is meeting their required annual training:

- Regional training coordinators
- The Training Administration System
- The Training Information System database
- The TN DOC Training Academy

There is no centralized system for monitoring training participation. Therefore, as noted in the Statewide Assessment, DCS is not able to provide data on the number of staff who complete the training requirements. Computer-based trainings are currently automatically tracked within the Training Division's online learning management system, MOODLE.

Private provider staff members are required to complete the same number of training hours as DCS staff. The TCCW is responsible for ensuring that providers are providing in-service training opportunities.

Stakeholder Interview Information

According to stakeholders at the three review sites and the State level, 40 hours of training are required annually for caseworkers and supervisors. At least 24 hours of a supervisor's annual hours must pertain to supervisory issues. The State sends out a list of available trainings monthly via e-mail. Stakeholders across the sites reported that training opportunities are available through the Consortium, local agencies/providers, DCS attorneys, and online services. Stakeholders reported that some trainings are mandated by the Central Office; for example, medication training is required every 2 years, and skills training may

be required based on trends identified during the QSR. Stakeholders also suggested that supervisors are supportive of ongoing training, and staff has the opportunity to attend.

State-level stakeholders reported that each region has a regional training coordinator who tracks annual training requirements. At this point, no corrective action is taken if requirements are not met. Additionally, stakeholders at the three review sites indicated that each office has someone who tracks the annual training hours.

As reported by State-level stakeholders, TCCW is working with regional staff to conduct supervisory Good to Great training. The course is 6 weeks of coach-supported training that involves teaching and coaching. At the end of the training, the supervisor takes a professional skills assessment to assess improvement in practice. Included in the process is a 360-model evaluation that includes self-assessment and evaluation/observations of several people for each supervisor.

Stakeholders at the State level and in Shelby County reported that DCS employees can receive a stipend to obtain their M.S.W. degrees through two universities. DCS pays for tuition and provides a stipend for books. According to these stakeholders, the employees are permitted to attend class full-time or part-time. Upon completion, the employees are required to work for DCS for 2 years. Additionally, Western Kentucky University has offered two cohorts for DCS students at DCS offices near the Kentucky border.

Item 34. The State provides training for current or prospective foster parents, adoptive parents, and staff of State licensed or approved facilities that care for children receiving foster care or adoption assistance under title IV-E that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children

 X Strength _____ Area Needing Improvement

Item 34 is rated as a Strength because the State requires and provides 30 hours of pre-service PATH training. Additionally, the State requires 15 hours of in-service training within 12 months of a family being approved and 15 hours annually every year thereafter. Participation in PATH training and ongoing training are tracked by the TCCW and entered into TN Kids. This item was rated as a Strength in Tennessee’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS requires PATH training for all foster, adoptive, and relative caregivers prior to approval of a home study. All applicants and adults living in the home with a significant parenting role must complete an intake

session and nine sessions of PATH for a 30-hour training requirement. Classes in medication administration, CPR, and first aid were recently added as required classes.

Additionally, all newly approved resource parents must complete 15 hours of required in-service classes within 12 months of the date that the family is approved. The required classes are the following:

- Working with Birth Parents
- Parenting with Positive Discipline
- Parenting the Sexually Abused Child
- Cultural Competency
- Education

In subsequent years, resource parents must complete 15 hours of training and may select training topics based on interest and need. Resource parents are required to be retrained in medication administration, CPR, and first aid every 2 years.

According to the Statewide Assessment, DCS policy requires that each of the regions have PATH sessions available for prospective resource parents every 30 days in order to afford potential parents an opportunity to begin the approval process in a timely manner. The training schedules offer flexibility as classes are offered at night, on Saturdays, and sometimes during the day. There is at least one PATH group started in every region each month, and regions that encompass multiple counties require more than one group per month. During FY 2007-2008, there were 196 PATH groups scheduled across the State. According to the Statewide Assessment, participants indicated overall that they are satisfied with the PATH training and the trainers who delivered the curriculum.

To ensure that each DCS resource family is receiving the required training, Resource Parent Support Units within the regions are required to review documentation that training has been completed as a part of the initial approval and annual reassessment process. Corrective Action Plans are issued and resource homes will not be reapproved without documentation of annual training. To prevent the removal of children placed in the home, DCS or private provider staff meets with the family to assist them in meeting their training needs. Children are rarely moved because of the resource family's non-compliance with training requirements.

According to the Statewide Assessment, the consortium provides 10 regional conferences for resource parents to obtain additional training in subject areas other than the required in-service training. Participants have an opportunity to earn up to 6 hours of training. In FY 2006-2007, 87 classes were delivered at 10 regional conferences, with 981 participants trained. At the

time the Statewide Assessment was completed, for FY 2007-2008, 87 classes had been delivered at 10 regional conferences, with 802 participants trained.

In addition to the regional conference, there is a statewide conference held each year. The statewide conference occurs over a 3-day weekend. During the conference, resource parents have the opportunity to receive 15 hours of training and network with other resource parents and agency staff.

To ensure that each private provider resource family is receiving the required training, DCS Licensure and PAR Team review resource parent files on site visits. The Licensure Unit of DCS reviews a sample of resource parent files at least semi-annually for all contract agencies operating under a license issued by DCS.

Stakeholder Interview Information

Stakeholders at the three review sites and the State level commenting on this item during the Onsite Review reported that PATH training must be completed prior to a child being placed in the home. Relatives with children already placed in their home that choose to go through the licensing process are allotted a certain amount of time to complete training. According to stakeholders, PATH training begins at least every 30 days and is conducted by the TCCW staff and resource parents. According to Shelby County stakeholders, PATH is offered during the evenings and on the weekends.

The opinions of PATH training varied among stakeholders. Some stakeholders reported that the training was excellent and of high quality. Other stakeholders reported that the training provided prospective foster parents with emotional awareness of fostering but not the technical side of fostering. For example, stakeholders reported that foster parents were not trained on the legal/court process, State statutes, DCS policy, or the role of the guardian ad litem. Some stakeholders expressed the opinion that the training is not adequate and does not focus on topics needed for foster parents.

Stakeholders in Putnam County reported that foster parents complete a self-survey that identifies their ongoing training needs. According to State-level stakeholders, the consortium meets with the Foster and Adoptive Parent Association about the training needs of foster parents. Most stakeholders across the sites indicated that there are ample training opportunities for foster parents to complete ongoing training, including 10 regional conferences and an annual State conference. However, some stakeholders in Putnam County also reported that there are not enough local trainings to complete the required training hours, but that training is available via the Internet or videos. Stakeholders in Shelby County reported that foster parents received specialized training. Stakeholders at the State level reported that caseworkers may make recommendations for foster parent training based on the needs of the foster parents and the children in their home.

According to stakeholders at the three review sites and at the State level, pre-service training and ongoing training is tracked by the TCCW and entered into TN Kids. If foster parents do not complete ongoing training, a corrective action plan is developed and a timeframe to complete the training is provided.

As reported by stakeholders at the State level, the State reviews private provider’s training plans annually. PAR monitors training standards, contracts, and policy manual requirements.

V. SERVICE ARRAY AND RESOURCE DEVELOPMENT

Rating of Review Team Regarding Substantial Conformity				
	Not in Substantial Conformity		Substantial Conformity	
Rating	1	<u>2X</u>	3	4

Status of Service Array

Tennessee is in substantial conformity with the systemic factor of Service Array and Resource Development. The State was found not to be in substantial conformity with this systemic factor in the 2002 CFSR and was required to address the factor in its PIP.

Key Concerns From the 2002 CFSR

The following concerns were identified in the 2002 CFSR:

- There were significant gaps in services.
- Procedures were lacking with regard to a formal evaluation of the quality of services.
- Prevention services for families whose children remained in the home were not adequate and caseworkers were not aware of the services that were available for these families.
- Children and families in rural areas had difficulty accessing services.
- Accessing flexible funds to meet the unique needs of children and families involved a cumbersome process that resulted in caseworkers often not requesting the funds.

- Services in general were not adequately individualized to meet the unique needs of children and families served by DCS.
- Fewer services were available in rural areas, and children and families often had difficulty accessing services in these areas.
- Accessing flexible funds was often difficult and cumbersome and resulted in less appropriate services for children and families.
- Services were not adequately individualized to meet the unique needs of children and families served by DCS.

The State implemented the following strategies in its PIP:

- The State increased the availability of services to children in State custody and their families by the use of the Brian A. needs assessment process and resulting allocation of funds.
- The State modified contracts with provider agencies to include performance measures. Providers must report to ensure that standards are met.
- The State developed IL services to address service gaps for youth age 14 and older, and staff and foster parents were trained on how to access IL services.
- The State increased the availability of services to children in State custody and their families by identifying appropriate funding streams to support child welfare services.
- The State identified appropriate funding streams to support child welfare services by conducting short- and long-term fiscal analyses and assessing and simplifying the flexible funding and needs assessment funding process.

The State met its goals for this systemic factor by the end of its PIP implementation period.

Specific findings of the 2008 CFSR for each item included in this systemic factor are presented below.

Item 35. The State has in place an array of services that assess the strengths and needs of children and families and determine other service needs, address the needs of families in addition to individual children in order to create a safe home environment, enable children to remain safely with their parents when reasonable, and help children in foster and adoptive placements achieve permanency

 X Strength Area Needing Improvement

Item 35 is rated as a Strength because the State has in place an array of services that addresses the needs of families and children and is designed to create a safe home environment, enables children to remain safely with their parents when reasonable, and helps children in foster and adoptive placements achieve permanency. This item was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

The Statewide Assessment reports that the following services are available in both every county and region in the State:

- In-home services are available through the MRS system. Assessment workers work in coordination with community agencies to develop consistent and focused service plans.
- Relative Caregiver Programs provide support services to caregivers who are raising and caring for related children that are not in State custody.
- Family Crisis Intervention Program (FCIP) provides 24-hour, on-call services that are designed to address problems in order to stabilize families with an adolescent who are in crisis because of the adolescent's behavior. By law, no child may be committed to the custody of DOC as an unruly child without the family having had the benefit of FCIP services prior to removing the child from the home.
- A wide array of custodial services is available to children entering foster care with an emphasis on supporting reunification and/or other appropriate permanency goals, on working to reduce the trauma of custody, and on meeting children's broader well-being needs.
- Regional Well-Being Units participate in CFTMs, consult with field staff on individual cases, and mentor team leaders and team coordinators on clinical supervision. These units include health advocacy representatives, services and appeals tracking coordinators, nurses, psychologists, educational specialists, consultant M.S.W.s, IL specialists, and CANS assessment evaluators.
- The COE provides consultation and evaluation for children in State custody who have complex behavioral and medical problems. The COE provides direct services to these children including psychiatric and psychological evaluations and medication management. For children with complicated medical problems, the COE coordinate referrals and services to medical sub-specialties and hospital services to meet the child's needs.
- DCS partners with the Tennessee Foster and Adoptive Care Association and with advocacy and mentoring programs to build networks of support for resource parents and to encourage and assist resource parents in actively working toward permanency for each child and youth.
- DCS contracts with Harmony to provide adoption support and preservation services, including crisis intervention, family and individual counseling, mentoring, respite, support groups, and training. Harmony also provides the FOCUS team, which recruits adoptive homes for children who are difficult to adopt and/or have been in guardianship for an extended period of time.
- The Office of Interdependent Living, which is geared toward serving youth in foster care ages 14 to 21, is responsible for statewide programming to implement the requirements and achieve the goals of the Chafee Foster Care Independent Living Program and Educational and Training Vouchers. Educational and training vouchers, and other services that are made

available through the use of State funds and partnerships with community and private agencies, are available to eligible youth up to their 23rd birthday if they are in school and making satisfactory progress at the time of their 21st birthday.

As reported in the Statewide Assessment, in December 2007, two versions of a community stakeholder survey were conducted to evaluate DCS's ability to deliver services, as well as to identify gaps in the availability of services for families. One survey was designed for service providers only, while the other was for an assortment of community partners, such as juvenile courts, resource parents, birth parents, and staff of other State agencies. A total of 206 responses were received. The results from the survey indicated an overall satisfaction rate of 56 percent for birth parents, 54 percent for the broad stakeholder group, and 69 percent for service providers. Identified service gaps included substance abuse counseling, mental health services, tutoring services, and more secure facilities for youth who enter foster care through the juvenile justice system.

Regarding the overall satisfaction rate for all stakeholder groups, the results included the following:

- 63 percent of respondents indicated that DCS assesses the strengths and needs of children and families and determines service needs.
- 57 percent of respondents indicated that DCS addresses the needs of families in addition to individual children in order to create a safe home environment.
- 51 percent of respondents indicated that services are available that enable children to remain safely with their parents when reasonable.
- 53 percent of the respondents indicated that DCS helps children in foster and adoptive placements achieve permanency.
- 66 percent of respondents indicated that services are easily accessible and convenient.

As reported in the Statewide Assessment, as a group, the service providers tended to rate DCS the highest for any given question, while juvenile court judges tended to reflect the lowest satisfaction rates. Additionally, the Statewide Assessment reports that the stakeholder survey results indicate that many stakeholders have a lack of confidence in the department's ability to provide quality family preservation and reunification services.

Stakeholder Interview Information

Most stakeholders commenting on this item during the onsite CFSR expressed the opinion that Tennessee has a rich array of services available to assist families. In addition, stakeholders reported an increase in the availability and quality of services in recent years. Stakeholders identified the following strengths with regard to service array:

- Concrete services provided by Community Advisory Boards (CABs)
- IL services

- Intensive family preservation services
- Dental services
- Medical services
- Educational specialists
- Well-Being Units
- COE
- EPSDT screenings
- Adoption support services

Stakeholders in Bradley County reported that caseworkers have a handbook listing the services available in the county, and expressed the opinion that MRS has spurred the development of more services in the area.

Item 36. The services in item 35 are accessible to families and children in all political jurisdictions covered in the State’s CFSP

Strength Area Needing Improvement

Item 36 is rated as an ANI because information from the Onsite Review indicates that not all services are accessible to children and families throughout the State. This item also was rated as an ANI in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, QSR data and stories sometime identify gaps in services but have not demonstrated glaring differences between urban and rural regions. As noted in item 35, for the 2007 to 2008 review year, resource availability was rated as 66 percent acceptable in urban regions and 62 percent acceptable in rural regions. Additionally, the Statewide Assessment reports that many families face multiple issues that can affect access to services including poverty, mental illness, parents’ lack of education and job skills, and parents’ lack of understanding of effective parenting skills.

According to the Statewide Assessment, the child and family delegated purchasing authority (DPA) was developed to accomodate the needs of all DCS regions. There are currently 185 approved vendors that can be accessed through a DPA, and these services are divided into 20 service categories ranging from such concrete needs as transportation assistance and sitter services to therapeutic counseling services. The regional Fiscal Directors and their fiscal teams are responsible for corresponding with program staff to identify service needs or gaps in existing service availability. This information is then shared with State fiscal/contract management staff who can provide additional technical assistance for developing solutions for

these service gaps. This strategy, according to the Statewide Assessment, has helped to develop new resources, although service gaps still remain in some areas. For example, one region reported that as a result of the resource linkage strategy associated with MRS, they have identified 60 additional community resources across their region that were previously unknown to them. However, the region has difficulty accessing certain counseling services for families in some parts of the region.

Concern was noted in the Statewide Assessment that front-line caseworkers often are not aware of the many resources available to children and families within their jurisdiction.

Stakeholder Interview Information

Although stakeholders commenting on this item during the Onsite Review reported a large array of services in Tennessee, they noted that some services are limited throughout the State and some are limited in only the rural areas. Various stakeholders identified the following services as not always accessible to children and families throughout the State:

- Poor public transportation, even though the department provides transportation in some situations
- Mental health services for young children
- Alcohol and drug treatment services
- Domestic violence services (particularly in rural areas)
- In-home services for children served by the juvenile justice system
- Treatment for sex offenders

Stakeholders also expressed concern about the limits of TennCare and in particular about not having a sufficient number of providers who are willing to accept TennCare. In addition, State stakeholders said that there are not enough child psychiatrists in the State, and as a result the State is using telemedicine and other alternatives to deal with this concern. DCS also is working closely with mental health workers to identify and address ongoing accessibility issues and communicate the needs of DCS families.

Bradley County stakeholders reported concerns that there is only one residential provider for older children available in the area, and that post-adoption services have only recently been offered due to the lack of a local provider.

Putnam County stakeholders indicated that the county lacks sufficient services to meet the needs of the growing Hispanic population, sufficient resources to meet the needs of homeless families, and sufficient affordable housing. These stakeholders noted that there are waiting lists for public housing.

Some Putnam County stakeholders expressed concern that funding sometimes impacts accessibility to services and that case managers may not always be helpful in assisting parents in locating services; i.e., they may give them a list of available services and leave them to locate a provider on their own.

While many Shelby County stakeholders indicated that wait lists are generally not an issue in that county, they did report that families may experience delays in receiving needed services due to the authorization process instituted by the department. Stakeholders reported that the county contracts for family preservation services; however, because the fee-for-service process requires approval each month, delays in processing the approval forms often result in interrupted services for children and families. Finally, stakeholders noted that some providers are not available after-hours and that families cannot always get to services during the day.

Item 37. The services in item 35 can be individualized to meet the unique needs of children and families served by the agency

 Strength X Area Needing Improvement

Item 37 is rated as an ANI because services needed to meet the unique needs of children and families cannot be individualized because they are not available in many areas of the State. This item was rated as an ANI in the State's 2002.

Statewide Assessment Information

According to the Statewide Assessment, DCS uses the following assessment tools to determine the unique services needed by families and children:

- The FFA includes four main domains; safety, well-being, permanence, and resource linkage. The FFA should include information gained from other professional and DCS-specific assessments and is intended to be updated quarterly throughout the life of the case. When used correctly, the FFA documents all assessment information in a concise and organized manner so a full understanding of the family is available. The FFA follows the family through all DCS involvement despite custodial status or multiple encounters. According to the Statewide Assessment, implementing the FFA to its fullest capacity is a work-in-progress, and it has yet to be utilized to its fullest potential.
- The FAST is a quantitative tool used to determine the strengths and needs of a family, and, when readministered over time, can show the effectiveness of service interventions.
- The CANS assessment is used first at the time of custody to determine the needs of the child when assessing for the most appropriate placement. Similar to the FAST, the CANS tool is to be readministered at specific, predetermined intervals to

measure the effectiveness of the service intervention. It can also be used to justify changes in service level as well as the appropriateness of discharge from custody.

- The YLS/CMI assessment tool is being implemented by DJJ. The results of the YLS are useful in assessing whether the child is at low, moderate, high, or very high risk of re-offending, and in the development of case plans that specifically target the identified risk factors and the associated action steps needed to reduce them.
- The Ansell Casey Life Skills Assessment is used to help youth who are age 14 and older identify barriers and needed skills as they progress toward IL. Based on the recommendations of the assessment, an IL Plan is developed with the youth that will help focus on deficiencies or areas for growth that have been identified.

As reported in the Statewide Assessment, the stakeholder survey sent out in December 2007 asked for a response to the following statements (the percentage responding favorably is indicated):

- Services are focused on the family as a whole; instead of services focusing on family deficits or dysfunctions, family strengths are identified, enhanced, and respected; service providers work with families as partners in identifying and meeting needs (overall satisfaction rate of 63 percent).
- Services are flexible, are crucial to and respond to real family needs, and are linked to a wide variety of other concrete services such as housing, substance abuse treatment, mental health, medical, job training, and child care (overall satisfaction rate of 59 percent).

Stakeholder Interview Information

Most stakeholders commenting on this item during the onsite CFSR expressed the opinion that DCS is cognizant of the need to individualize and tailor services to the individual circumstances of the family. Stakeholders at the State level reported that assessments and CPS caseworkers have the ability to individualize services by using contracts and flexible funding to help families access resources and by using team meetings to identify a family's unique needs. Bradley County stakeholders, however, reported that although individualizing services for families is improving, it is limited due to insufficient resources. Putnam County stakeholders commenting on this item expressed that individualizing services for Hispanic families has been difficult due to the lack of services available to serve the Hispanic population in that area.

VI. AGENCY RESPONSIVENESS TO THE COMMUNITY

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	<u>3X</u>	4

Status of Agency Responsiveness to the Community

Tennessee is in substantial conformity with the systemic factor of Agency Responsiveness to the Community. Tennessee was in substantial conformity with this systemic factor in its 2002 CFSR and was not required to address the factor in the PIP. Specific findings of the 2008 CFSR for each item included in this systemic factor are presented below.

Item 38. In implementing the provisions of the CFSP, the State engages in ongoing consultation with Tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals and objectives of the CFSP

 X Strength _____ Area Needing Improvement

Item 38 is rated as a Strength because the State engages consumers, service providers, foster care providers, the court, and other public and private child- and family-serving agencies in developing goals and objectives of the CFSP. This item also was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

As reported in the Statewide Assessment, the Children's Services Advisory Committee (CSAC) is DCS's oversight council. It is comprised of representation from the legislature, Department of Human Services (DHS), DOE, Department of Mental Health and Developmental Disability (DMHDD), Juvenile Courts, CASA, AOC, Community Advocacy Centers, a birth mother, a resource parent representative, and numerous other partners. CSAC supports achievement of core goals.

Additionally, according to the Statewide Assessment, service providers, AOC, youth, TCCY, and education staff were engaged in creating DCS's Mission, Vision, and Values Statements. This process allowed DCS to include the perspective of external stakeholders in strategic planning.

The Statewide Assessment also notes that there is a DCS Strategic Planning group that has been meeting for the past year. This group, composed of DCS staff, State agency representatives, and private community partner agencies, has helped define the department's current Mission, Vision, and Values Statements. The department's goal will be to use the principles of the Mission, Vision, and Values Statements as the foundation for a plan that will ultimately serve as the revised CFSP. The department has a long-term commitment from these stakeholders to continue the work to develop a central strategy.

Regions have implemented open forums to allow consumers the opportunity to participate in dialogue with DCS staff. These forums have been convened in every region several times in the past 2 years. Locations for these forums have been strategically chosen within communities during hours convenient to the consumer. In some regions, invitations were extended to local courts and legislators. Stakeholders in Shelby County acknowledged the convening of the forum but expressed frustration regarding the lack of participation by executive staff.

Tennessee does not have any Federally registered Indian tribes, but according to the Statewide Assessment, DCS has identified a contact person with the North Carolina Bureau of Indian Affairs for ongoing assistance. Additionally, DCS has made contact with the Eastern Region Bureau of Indian Affairs to gain technical assistance as needed.

Stakeholder Interview Information

According to stakeholders at the State level commenting on this item during the Onsite Review, the CFSP was developed by DCS staff and stakeholders.

Item 39. The agency develops, in consultation with these representatives, annual reports of progress and services delivered pursuant to the CFSP

 Strength X Area Needing Improvement

Item 39 is rated as an ANI because stakeholders indicated that DCS does not adequately consult with external stakeholders in developing Annual Progress and Service Report (APSR). This item also was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment

According to the Statewide Assessment, DCS has an Advisory Council that acts in an advisory capacity to the commissioner. This committee of citizens and agency representatives meets quarterly and advises the commissioner on various issues of concern related to the safety, permanency, and well-being of children.

Some Citizen Review Panels have reviewed policies and provided feedback that can be used in departmental planning. CABs are providing local community consultation so that the department can respond more quickly to the trends in specific communities and adjust regional plans accordingly.

DCS solicits recommendations from stakeholders such as the CSAC and the Child Abuse Prevention Advisory Committee for planning consideration. The Children's Justice Task Force (CJTF) provides oversight for the MRS and produces a report biannually that is used for planning purposes.

Stakeholder Interview Information

Stakeholders at the State level commenting on this item during the Onsite Review indicated that the State has a strategy team in place that includes DCS staff from all levels, former foster youth, AOC, TCCY, DOE, and service providers. The stakeholders indicated that this group has been involved in writing strategic plans and would like them to be involved in the APSR as well.

Item 40. The State's services under the CFSP are coordinated with services or benefits of other Federal or Federally-assisted programs serving the same population

 X Strength _____ Area Needing Improvement

Item 40 is rated as a Strength because the State coordinates the services provided by DCS with the services of other Federal or Federally-assisted programs that serve the same population. This item also was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS works in partnership with a number of State agencies and community stakeholders in an effort to ensure the safety of children, improve the well-being of children and families, and expedite permanency for children. The DCS commissioner serves with leaders of other child service agencies on the Governor's Children's Cabinet.

The State collaborates with a number of Federal and Federally-assisted programs including:

- TennCare
- DMRS
- DOH
- AOC in the CIP
- DOE
- DMHDD
- Head Start
- Tennessee United Way
- The Governor's Office of Children's Care Coordination
- University of Tennessee
- Child care resource and referral agencies

Another collaboration found in all counties in the State is the CAB. CABs identify both formal and informal community-based resources that may be needed by families. The CJTF, a statutorily mandated multidisciplinary group, serves as the State Advisory Board. It partners with DCS to assist in identifying gaps in services in local communities and presents recommendations to address the identified needs, review MRS outcomes, and to improve statewide implementation.

Stakeholder Interview Information

Most stakeholders at the three review sites and the State level commenting on this item expressed the opinion that DCS has strong collaboration with key stakeholders. Stakeholders indicated DCS has a positive collaborative relationship with child support, Temporary Assistance to Needy Families (TANF), Food Stamps, TennCare, DOH, DMHDD, DOE, CJTF, DHS, TCCY, COE, CAB, the United Way, and the University System.

According to stakeholders at the State level, CABs are mandated in legislation and are considered community partners. There is generally a CAB in every county; however, small counties share CABs. The purpose of the CAB is to identify gaps in services and to locate and coordinate resources to fill in the gaps. Additionally, CABs collaborate with DCS to provide services to families in need. The CABs are composed of community members and community stakeholders, including the United Way, churches, CASAs, parents, foster parents, and Child Advocacy Centers. Frequently to meet a family's needs, a CAB will collaborate with local business owners. According to stakeholders at the three review sites and the State level, CABs can

provide concrete services including appliances, housing assistance, and housing repairs that allow children to be maintained safely in their homes.

Stakeholders at the State level reported that there is a statewide CAB that is a multidisciplinary, diverse group. The DCS Commissioner provides information to the statewide CAB on happenings within DCS, including action plans, policy, and initiatives.

VII. FOSTER AND ADOPTIVE PARENT LICENSING, RECRUITMENT, AND RETENTION

Rating of Review Team Regarding Substantial Conformity				
Rating	Not in Substantial Conformity		Substantial Conformity	
	1	2	<u>3X</u>	4

Status of Foster and Adoptive Parent Licensing, Recruitment, and Retention

Tennessee is in substantial conformity with this systemic factor. The State was in substantial conformity with this factor in the 2002 CFSR and was not required to address the factor in its PIP.

Item 41. The State has implemented standards for foster family homes and child care institutions that are reasonably in accord with recommended national standards

 X Strength _____ Area Needing Improvement

Item 41 is rated as a Strength because the State has implemented standards for foster family homes and child care institutions that are reasonably in accord with recommended national standards. This item also was rated as a Strength in the State’s 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS's standards for resource and adoptive homes, group homes, and residential facilities are consistent with national standards. Resource and adoptive home standards are clearly established and written in both DCS policy and the DCS Private Provider Policy Manual. According to policy, no resource placement is eligible for Federal reimbursement without meeting the requirements set forth in policy. All DCS and private provider homes and facilities must be relicensed or reapproved on an annual basis. Additionally, a monitoring system is in place to ensure the standards are maintained.

According to DCS policy, all resource parent applicants and any adults over age 18 living in the household having a significant parenting role must complete PATH training and a home study that includes all background checks. Private provider resource homes providing a higher level of care must receive additional, specialized training. Policy also mandates that a decision regarding approval should be made within 90 days of the completion of the PATH training for DCS homes and within 90 days of PATH and the therapeutic training for private provider agencies. Resource homes may have up to three foster children with a maximum total of six children including birth children. Exceptions are rare but are granted to keep siblings together.

All information needed for a fully approved resource home must be received and placed in individual resource home files prior to approval.

All foster homes in Tennessee are required to be certified title IV-E homes. However, a 120-day waiver period is allowed so that kinship placements can be made on an expedited basis. All relative and kinship homes for custodial children are required to complete the entire approval process including PATH training within the expedited approval period.

DCS group homes are subject to licensure approval and monitored regularly by DCS Division of Licensure through routine unannounced visits to ensure that all requirements are being met. A monitoring report is completed and the division tracks the progress of issues identified during the monitoring visit.

All provider agencies contracting with DCS for the child placing services are licensed by DCS or DMHDD. In order to ensure that every contract agency has a current license, the DCS Licensure Unit collaborates with the Child Placement and Private Providers unit and the other licensure entities (DMHDD and DOH). DCS Licensure verifies licenses for all DCS placement providers and subcontractors. PAR audits for private provider resource background checks and home studies.

Licensure staff conducts annual reviews to ensure compliance with licensure standards. Additionally, unannounced visits to these agencies are conducted on a regular basis at least three times per year. Reviews also are conducted in response to complaints received for specific agencies. A written summary of all findings and observations is generated for each review or site visit conducted by a Licensure Consultant, regardless of the scope of the review. All licensing summaries are available for public review through open records laws.

Beginning in July 2007, the Resource Home Review Team (RHET) began reviewing and maintaining title IV-E eligibility documents on each provider resource home, both at the time of initial approval and annually. Providers will be assessed penalties for noncompliance. Preliminary RHET findings from the review of documentation for homes up for approval or annual reapproval between October 2007 and February 2008 indicated that about 4 percent of homes have findings warranting penalties.

Stakeholder Interview Information

Stakeholders across the sites commenting on this item during the onsite CFPSR indicated that the State has consistent approval standards for all foster homes. DCS policy, according to stakeholders at three review sites and at the State level, outlines the following approval requirements:

- Background checks
- Completion of PATH training
- CPR training
- First-aid training
- Participation in home visits by every adult in home
- Structured Analysis Family Evaluation (SAFE) assessment
- Approved home study

According to stakeholders in Bradley County and Putnam County, the SAFE home study format, although it increases the length of time before approval, is comprehensive in assessing issues such as parenting, drugs and alcohol, sexual abuse, and the relationship between foster parents.

Stakeholders at the three review sites reported that home studies on relatives' homes may be expedited. The expedited home study includes a home visit, local background checks, references, and a review of financial statements. After the child is placed, the relative placement has 15 days to complete fingerprinting and 120 days to complete the SAFE home study process.

Stakeholders at the State level and the three review sites commenting on this item indicated that foster homes must be reapproved on an annual basis. Additionally, stakeholders at the State level reported that reapproval also must occur when substantial changes occur within the home or another adult enters the home. The reapproval process assesses the physical condition of the home, physical safety of children, the quality of care provided to foster children, completion of training, and foster parent needs. TN Kids provides alerts regarding need for reapproval. Foster parents, according to Bradley County stakeholders, have the right to supervisory review if denied approval.

According to stakeholders in Bradley County, licensing standards of private child placing agencies are monitored very closely. Stakeholders at the State level reported that private provider therapeutic foster homes are required to obtain an additional 15 hours of training for approval.

According to Shelby County stakeholders, Utilization Review Teams go into foster homes and conduct reviews of foster parents.

Item 42. The standards are applied to all licensed or approved foster family homes or child care institutions receiving IV-E or IV-B funds

 X Strength _____ Area Needing Improvement

Item 42 is rated as a Strength because the State applies the standards to all licensed or approved foster family homes or child care institutions receiving title IV-E or IV-B funds. This item also was rated as a Strength in the State’s 2002 CFSR.

Statewide Assessment

According to the Statewide Assessment, all resource homes, including relative and kinship homes and residential facilities, must meet the same criteria for approval. All information needed for a fully approved resource home must be received and placed in individual resource home files prior to approval. Every resource placement for DCS is expected to comply with the same requirements that any new resource placement must follow in order to be an approved resource placement. According to policy, no resource placement is eligible for Federal reimbursement without meeting the requirements set forth in policy. Homes either approved or reapproved between October 2007 and February 2008 were reviewed by the Resource Home Eligibility Team. Preliminary review findings found that only 4 percent of the homes had findings warranting penalties.

In addition to the approval requirements mandated by the State, resource homes must also meet all applicable Federal requirements for eligibility.

Stakeholder Interview Information

Stakeholders commenting on this item during the onsite CFSR expressed the opinion that licensing standards are applied equally for all substitute care providers. No payments to providers can be processed until all licensure/approval information is completed. Relative placements cannot receive the foster care board payments until they are fully approved for licensure, although they can access TANF and child care funds without licensure.

Item 43. The State complies with Federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children

 X Strength Area Needing Improvement

Item 43 is rated as a Strength because the State complies with Federal requirements for criminal background clearances and other processes for addressing the safety of children in foster care and adoptive placements. This item also was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, Tennessee law reinforces the Federal requirement of criminal background checks for those wishing to serve as foster or resource parents or for those adults residing with the prospective foster or adoptive parent. DCS policy states that all adults living in the prospective adoptive or foster home must complete a release by the conclusion of the first PATH session and that criminal background checks must begin immediately following the first PATH session to help reduce the wait for a placement of a child in a newly approved resource home. The home study is not approved until the fingerprint clearance has been received and verified. The family is not eligible for placements until the home study has been approved by two levels of supervision beyond the home study writer.

A criminal background check includes local records, TBI/FBI fingerprinting, an Internet records check, and a DCS records review. A check must be completed on each applicant, as well as any other adult member of the household, and documented in the resource home case record. By Tennessee law, an adult is defined as any person age 18 or older. If the resource parent has not been in residence in the county for a period of 5 years, any criminal record must be determined by a records check in his/her current place of residence and any other place of residence for no less than 5 years previous.

Except for expedited placements, no child may be placed in a resource home that has not been fully approved. Expedited placements (placement with a relative or a person who has a significant relationship) are used to minimize trauma to the child. If

the expedited placement is in the best interests of a child, DCS staff must secure a release from all adult household members and conduct an expedited placement assessment. The assessment must include a criminal records check. The expedited placement resource and all adult members of the home must agree to be scheduled for fingerprinting immediately after placement. Fingerprinting must be completed for expedited placement resources within 15 days. Failure to comply with this requirement will result in child's removal from the placement.

For FY 2007, 137 foster child files and 120 resource parent files were reviewed during the State audit. In one provider resource home review, there was not adequate evidence that a local background check was completed.

Stakeholder Interview Information

Stakeholders at the three review sites commenting on this item during the onsite CFSR expressed the opinion that DCS requires criminal background clearances for all adults living in a prospective foster homes prior to a child being placed in the home. Criminal background clearances are required on all adults residing in a relative placement within 15 days of a child being placed in the home. Most stakeholders reported that the results are received quickly.

Item 44. The State has in place a process for ensuring the diligent recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed

Strength Area Needing Improvement

Item 44 is rated as an ANI because according to stakeholders there are minimal formal recruitment activities in the State and few that are geared to the recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed. Additionally, the Statewide Assessment and stakeholder interviews indicate the State struggles with maintaining a sufficient pool of resources homes that match youth and children in custody, including African-American families, homes for large sibling groups, and homes for adolescents.

This item was rated as an ANI in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, DCS continues to struggle with recruiting and maintaining a sufficient pool of resource parents to match the needs of children and youth in custody. As reported in the Statewide Assessment, the State has a large number of teenagers (51 percent) and large sibling groups in custody; therefore, there is a constant need for resource homes to accept these populations. Although the department has an adequate number of homes to reflect racial and ethnic diversity, certain areas of the State do not have enough homes to meet individual needs.

According to the Statewide Assessment, each region is to maintain a regional recruitment plan that is developed in collaboration with the community and private providers and updated every 6 months. The plans include the following:

- Demographic information about the children and families served in the region
- A summary of the region's general, targeted, and child-specific recruitment efforts
- A summary of planned general and targeted community awareness activities
- A strategy for engaging community partners
- A projection of the number of homes expected to be gained from each recruitment event
- The technical assistance and resources needed from the State
- A strategic plan to support and maintain current resource parents
- A plan to increase relative placements

Additionally, these plans should reflect keeping children in their neighborhoods when recruitment is also conducted through the CAB. If a CAB identifies a need to recruit more resource homes, then it should agree to partner with DCS in reaching out to the community. DCS provides data to the CABs on the number of children that are currently in State custody per county, which can be used to develop a plan for recruitment if the community identifies the need.

According to the Statewide Assessment, DCS policy requires that any child in custody for more than 12 months with a goal of adoption and no identified placement resource should have a child-specific recruitment plan developed and implemented. Additionally, any child entering full guardianship without a permanent family is referred to the FOCUS Team within 60 days.

The Statewide Assessment provided the following TN Kids data comparing the number of custodial children to the number of resource homes, DCS and private providers, of the same race as of February 29, 2008.

Race	Custodial Children	Primary Caretaker
White	5286	2845
African American	2390	1434
Asian	18	3
Native Hawaiian/Other Pacific Islander	6	5
Multiple Race	236	7
American Indian/Alaska Native	8	10
Unable to Determine	242	138
Total	8186	4442

According to the Statewide Assessment, DCS has invested in several statewide recruitment activities, including the Adoption Bike Tour, National Adoption Month, National Foster Care Month, Home for the Holidays, AdoptUsKids, and the Heart Gallery.

Stakeholder Interview Information

Stakeholders at the three review sites and at the State level indicated that there are minimal formal recruitment activities in the State and few that are geared to the recruitment of potential foster and adoptive families that reflect the ethnic and racial diversity of children in the State for whom foster and adoptive homes are needed. Additionally, the stakeholders expressed the opinion that the State needs more targeted recruitment than general recruitment. The primary means of recruitment reported by the review sites is word of mouth by current foster parents. State-level stakeholders reported that they do not have recruitment positions at the State level.

State-level stakeholders reported that DCS does not have foster parents for sibling groups, teenagers, and African-American children.

Stakeholders at the State level reported DCS participation in the Adoption Bike Tour and the use of the Heart Gallery to promote adoption. Additionally, stakeholders discussed FOCUS, a statewide initiative that attempts to create permanent homes for children.

Bradley County stakeholders reported positive recruitment efforts and reported that the county has enough foster homes for appropriate matching of children to families of similar ethnic and racial background in close proximity to the parents.

Additionally, stakeholders in Bradley County reported that the Hispanic population is growing, and the county has made efforts to recruit Hispanic foster parents.

Putnam County stakeholders reported that there are regional and cluster recruitment plans that are both updated every 6 months; however, stakeholders did not provide information about the recruitment plans. The stakeholders reported that the Youth Conference, word of mouth through churches and radio announcements have assisted with recruitment. Foster parents are needed for teenagers and large sibling groups and, according to Putnam County stakeholders, resource panels and youth panels gave a presentation to recruit for these populations that yielded four foster homes. Caseworkers send current foster parents PATH training brochures monthly to distribute to prospective foster parents.

Shelby County stakeholders reported that recruitment of foster parents is conducted by community partners and is based on the need of the agency. The data team gathers information on race and ethnicity of children in care and provides the information to the recruitment agencies.

Item 45. The State has in place a process for the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children

Strength **Area Needing Improvement**

Item 45 is rated as a Strength because DCS utilizes cross-jurisdictional resources to facilitate timely adoptive or permanent placements for children. This item also was rated as a Strength in the State's 2002 CFSR.

Statewide Assessment Information

According to the Statewide Assessment, in February 2006, the DCS ICPC office established a regional partnership and collaboration to allow for regional expertise in the area of interstate placements. According to the Statewide Assessment, for the period from October 1, 2006, to October 1, 2007, DCS received a total of 201 requests for Interstate Studies from other states through ICPC. During that same time period DCS sent 13 adoption requests, 36 foster home requests, and 86 relative requests through ICPC.

DCS recruits nationwide through the web-based Wednesday's Child programs. In October 2006, DCS established a contractual relationship with AdoptUsKids to feature DCS children on its website. Since that time, according to the Statewide Assessment,

more than 1,845 inquiries have been made. Unfortunately, DCS does not have the capability to link inquiries from AdoptUsKids to TN Kids placement data to determine how many children were placed as a result of inquiries.

Additionally, DCS has participated in several statewide recruitment activities, including the Adoption Bike Tour, National Adoption Month, National Foster Care Month, Home for the Holidays, and the Heart Gallery.

Stakeholder Interview Information

Stakeholders at the State level commenting on this item during the onsite CFSR reported the use of AdoptUsKids to locate adoptive placements outside the State. Additionally, the State has an adoption website.

Stakeholders in the three review sites reported the use of ICPC to place children. All stakeholders reported that the ICPC process in the State is well-organized and expeditious. However, the ICPC responses from other States are frequently cumbersome and slow.

Stakeholders in Bradley County reported that DCS looks for placements within the county and the region before looking in other jurisdictions. Stakeholders reported that children are registered with the State and with national adoption resources.