

April 17, 2011

Jan Rothstein, Division of Policy
Children's Bureau, Administration on Children, Youth and Families
Administration for Children and Families
1250 Maryland Avenue, S.W., 8th Floor
Washington, D.C. 20024

Re: Federal Monitoring of Child and Family Service Programs; Request for Public
Comment and Consultation Meetings (Federal Register Doc. 2011-8044)

Dear Ms. Rothstein,

I write to comment on improving the Child and Family Service Reviews (CFSRs) process. First, I applaud the Administration for Children and Families for holding states to such high standards in their implementation of child abuse and neglect programs. However, I do have the following comments intended to improve the quality of these programs nationwide.

1. 45 CFR Part 1355.34(b)(5) – The national standards for substantial conformity in meeting statewide data indicators should be changed from the initial standard of being within the top 75th percentile of the states for each indicator to an independent objective standard set by the Secretary. This standard should set at a numerical standard equivalent to or greater than the national standards at the end of the second full round of CFSRs.
2. Appendix A to Part 1355 – This states that children who are at home on a trial basis “may” be considered to be in foster care for reporting purposes. This ambivalent language should be changed to either “shall” or “shall not” to ensure that all states are reporting their foster care data consistently.

With regard to the questions presented in the proposed rule, please consider my responses numbered accordingly:

1. I believe that the current practice indicators and outcomes identified by the regulations accurately reflect the goals of a properly functioning child welfare system. As discussed above, I believe that changing the indicator standards to a set numerical standard rather than a percentile standard will help to promote continuous quality improvement.
2. Data from national child welfare databases are only helpful to the extent that the information in these databases come from consistent definitions across all states. If states have differing standards for reporting information to a national database, the information contained in that database is inherently skewed.
3. Child welfare information management systems should play a large role in the Federal monitoring process. However, these systems should not take the place of the face to face interviews currently conducted under the CFSRs.
4. State/tribal/local child welfare agencies should have a say in establishing targets for improvement and monitoring performance toward those targets. However, as these agencies would like to receive continued federal assistance for their programs, they may try to set targets lower than what children and families deserve. Other stakeholders

should be able to make comments and suggestions as to the targets being established for the agency, as some stakeholders such as direct service providers may be spending a greater amount of time with the families being served by the state agency and thus may be better able to see where there are gaps in performance.

5. No comment.
6. For those states that are in substantial conformity with Federal child welfare laws already, the threat of lost funding if they slip in the next CFSR likely serves as a powerful motivation not to stop improving. As far as incentives go, subsidizing merit-based bonuses for workers in states in substantial conformity would help to maintain positive worker morale from the bottom-up.
7. No comment.
8. No comment.

Thank you for the opportunity to comment on the CFSR process.