



OKLAHOMA DEPARTMENT OF HUMAN SERVICES

Sequoyah Memorial Office Building
P.O. Box 25352
Oklahoma City, OK 73125-0352
(405) 521-3646 • www.okdhs.org



May 20, 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, DC 20024

RE: 45 CFR Parts 1355, 1356 and 1357
Federal Monitoring of Child and Family Service Programs; Request for Public Comment and Consultation Meetings

Subject Line: Comments on the CFSR *Federal Register* Notice/Vol. 76, No. 65/Tuesday, April 5, 2011/Proposed Rules

Dear Ms. Rothstein,

The Oklahoma Department of Human Services (OKDHS) Children and Family Service Division (CFSD) is submitting these comments in response to the –Federal Monitoring of Child and Family Service Programs; Request for Public Comment and Consultation Meetings|| that was issued by the Administration for Children and Families (ACF) on April 5, 2011.

OKDHS Director, Howard Hendrick; COO, Marq Youngblood; CFSD Director, Deborah Smith; and Continuous Quality Improvement Program Administrator, Amy White attended the Casey Family Programs "Optimizing Child Welfare Outcomes and CFSR Performance" meeting in Atlanta in October 2010. That exchange of information and discussion related to the revision of the Federal Children and Family Services Review (CFSR) process prompted further activities on a State level to identify a team of individuals with expertise in CFSR to formulate viable recommendations for the redesign of the CFSR. (see attached CFSR-PIP Discussion Guide).

Thirteen team members participated in multiple meetings and conference calls during the month of December 2010 to analyze the process, present ideas, and identify priorities for change that could enhance the quality of improvement efforts to achieve safety, permanency and well-being for the children and families served through the Oklahoma child welfare system. On-going collaboration occurred through e-mail submission and conference calls with the American Public Human Services Association (APHSA) and its affiliate, the National Association of Public Child Welfare Administrators (NAPCWA).

Oklahoma would like to extend our support for the recommendations submitted by APHSA and NAPCWA submitted to you on May 12th and reiterate the following priorities:

- Integrating the Self-Assessment, CFSR/PIP and CFSP/PSR into one process with one streamlined document for planning, implementing, measuring and reporting purposes is of primary importance and immediate action to implement it is paramount. This would require looking at and changing the format for each process. Redundancies should be removed between the processes and within the CFSP itself.

- Develop refined measures that are accurate, valid and reliable and that child welfare stakeholders and staff can easily understand. Examine the improvement of the state's child welfare system across time and against its own baseline. Gather and analyze data that yields state-specific information about client populations that can easily be applied as a predictive tool for forecasting change in client needs and how to adjust programs accordingly.
- Rely on states' quality assurance and continuous quality improvement systems to drive state performance and meet federal review and accountability requirements. Develop guidelines for viable state continuous quality improvement systems that allow states to routinely employ their own review tools or adapt and integrate federal ones as necessary. Methods for assessing systemic factors should be clearly defined, transparent and not subject to personal beliefs or biases.
- Establish mechanisms to promote performance improvements and innovation that can be equitably applied across the nation. Place a moratorium on any withholding of funds until a means is developed to ensure that the withholding of funds is based on accurate performance measures and standards that can be applied equitably across the nation. Explore incentives to recognize and encourage building on programs and practices that have proven effective are a powerful way to promote innovation and improve outcomes. Incentives could be tied to achieving outcome measures, as long as there is sufficient information from the COI/QA system to validate the findings. Financial incentives, such as adoption incentives, are an optimal way for motivating change in child welfare systems.

In closing, we thank you for the opportunity to provide Oklahoma's comments on proposed improvements to the CFSR and PIP processes.

Respectfully submitted,

Cheryl Coponiti, MSW
OKDHS CFSR Programs Manager