



National Association of Public
Child Welfare Administrators

an affiliate of the American Public Human Services Association

**CFSR/PIP All State Telephone Discussion Summary
Conducted March 3 2008 – April 3, 2008**

Between March 3 and April 3, 2008, the National Association of Public Child Welfare Administrators (NAPCWA) conducted telephone discussions with state child welfare administrators and/or their designees to gather in-depth information about the issues states identified as priorities in a February 2008 survey regarding Child and Family Service Reviews (CFSRs) and Program Improvement Plans (PIPs).

Sample and Structure

Between the February survey and the telephone follow-ups, NAPCWA gathered information from a total of 44 states and the District of Columbia. The responses from the electronic survey sent out in February served as the basis for developing the structured interview questions for the in-depth discussions that followed. There were four states that participated in the February survey only, 20 states that participated in both the February survey and the in-depth discussions, and 21 states that participated in the in-depth discussions only. Of the states that participated in the in-depth discussions, 39 did so over the phone and two did so through written responses. The information from February survey has been merged as applicable into the findings below. Discussions with the twenty-one states that were first-time contacts included some questions from the original survey. As of April 1, 2008 18 states have completed round two of the CFSR. Seventeen of those 18 states participated in a discussion.

We broke down the responses by region, but discovered that analyzing similarities and differences in this way was not productive. It was also sometimes unclear based on our conversations whether states' concerns arose from their interactions with the Children's Bureau Central or with the Bureau's Regional offices. The responses by Federal Region are as follows:

States Represented by Region					
Region	Number of States with CFSR Conducted	Number of States responding	Means Information Gathered		
			Only February Survey	Only March Discussion	Survey & Discussion
I	6	4		2	2
II	3	2		2	
III	6	6	1	1	4
IV	8	7	1	3	3
V	6	5	1	1	3
VI	5	5		2	3 *
VII	4	4		3	1
VIII	6	4	1	2	1
IX	4	4		3 *	1
X	4	4		2	2

* Includes 1 written response based on the structured interview questions.

Trends

While states' experiences varied significantly, several common threads emerged:

- A. The planning phase for the CFSR Onsite is generally a collaborative and supportive effort between state and federal regional offices and contractors, but onsite planning activities require extensive workforce commitments on the part of the states.
- B. The onsite collaboration between the federal and state teams at all levels is characterized by a high level of professionalism, but cannot truly be called a partnership since the Federal government is clearly in charge.
 - With few exceptions, review team pairs had very good working relationships.
 - The relationship between the federal and state leads at all levels was generally professional and collaborative.
 - The first level quality assurance (QA) and stakeholder interviews are handled differently across sites and states, in part as a function of available time. The end result is that the state site leaders' involvement and ability to advocate for the states is usually limited.
- C. There are inconsistencies across sites and states in the way that cases are rated and the way that debriefings and exit conferences are conducted.

- D. There are inconsistencies within states regarding the information they receive from the verbal reports, the courtesy report, and the final report.
- E. The states are provided with a high level of technical assistance from the federal regional offices and the National Resource Centers in the development of their PIPs, but this is somewhat mitigated by delays in the receipt of final reports and variations in PIP requirements.
- F. There are evaluative differences from round one to round two due, in part, to changes in the definitions of the items. The automation of the tool in round two also leads to more rigidity in the ratings and an increased requirement for documentation in the record by the review team.
- G. Most states have developed Quality Service Reviews (QSR's) that align with the onsite component of the CFRS and these states believe they could provide the information that would be more reflective of state practice than that gathered through the Federal process.
- H. Penalties remain a concern for all states, particularly in view of the changes in the national standards and AFCARS reporting. Of the states we communicated with, six were assessed with penalties from round one and six remain concerned that they will be penalized as well.
- I. Most states have some concerns about the CFRS/PIP processes, and many have been able to suggest ideas for improvement.

The responses to questions related to each of these areas have been summarized below. We attempted to relate as many of the expressed points of view as possible, while remaining concise and focusing on the trends. One thing that is clear: to keep abreast of states' experiences of the CFRS/PIP processes and identify and provide support to the states as issues emerge we need to conduct follow-up calls to the states as each concludes its onsite component, develops its PIP, and implements its plan.

For those states that have not yet completed the onsite component of round two, we propose to contact them again within two weeks after their onsite to get initial feedback on the review process, and again 90 days later to track the status of their Final Report and assess the PIP development process.

Section I. Includes information from 18 of the 19 states that completed the onsite component of round two by April 11, 2008.

A. Planning for the Onsite

- The planning phase is very labor intensive for the states in the months leading up to the onsite and during the actual review week. They are responsible for tasks such as: case sampling, selecting state reviewers and matching them with federal consultants, scheduling stakeholder and case-related interviews and setting up transportation for the review teams

and leaders. There is no additional staff or federal funds to cover the cost; so, with few exceptions, state staff must take time away from their other duties. Work site costs incurred by state staff for hotels and transportation are high. The interviewees were unsure what or how much could be charged back to IVE.

- The planning calls throughout the Statewide Assessment Onsite preparation phase were helpful, as was the accessibility of the regional office. All states noted high engagement during the planning process with their respective regional office and the federal contractor (JBS International, Inc.), however:
 - Eleven states noted that though the process was very supportive and planning calls for the onsite were helpful, if anything, there were too many phone calls - perhaps to the point of micro management. They reported that the calls were instructional rather than collaborative in that the state was expected to receive and follow instructions and to provide information requested. It is suggested that states should be more engaged in setting the call agendas to ensure they have the opportunity to discuss problems that they may be having with the preparation. There could be a better balance between providing the state with instructions and using the time to learn about the state and the needs and difficulties it may have in meeting the CFSR onsite requirements.
 - Six states noted that there were several expectations that, if made clear prior to the actual onsite, would have allowed for better planning on the part of the state. There was confusion about the use of youth as reviewers, the elimination of cases, the space requirements for reviewers, hotel reservations, IT needs for the automated equipment, the number and type of case related interviews and the number and type of stakeholder interviews. Many of these misunderstandings were the result of discrepancies between guidance received from different sources. On more than one occasion, state staff were left scrambling to set up additional interviews or canceling interviews at the last minute with clients who had been prepared for the process and who ended up feeling devalued. States also found themselves needing to displace unprepared staff from offices and pulling IT staff to troubleshoot.
- Continual changes in the onsite materials and tools made it difficult for state reviewers to be as prepared as they would have liked.

Section II. Includes information from 16 of the 17 states that completed the onsite component of round two by mid March 2008.

B. Collaboration in the Onsite Phase

States found the onsite phase of the review process very work intensive. The same people described the week as both grueling and positively energizing. With a few individual exceptions, respondents described the working relationships between the state teams and the federal teams as highly professional, but not truly a partnership as it was clear that the federal leaders were in charge.

Review Team Pairs

- All states reported that, for the most part, the review team pairs formed good working relationships.
- Two of the states noted that the good working relationships were due in part to the state efforts in matching the federal and state reviewers.
- A few states reported individual issues such as: inexperienced federal staff using a state's onsite as a learning experience and slowing things down, hostile or rigid reviewers, and case reassignments or re-matching of review pairs resulting from review team pairs that were unable to keep up with the pace of the week.

Site Leaders

States reported that with few exceptions state and federal site leaders formed good professional working relationships, but noted the following:

- Six states reported a challenging, adversarial relationship with an individual federal site leader.
- Federal leaders outnumbered the state leaders and did not allow states to add members to achieve parity. This made it impossible to have a state presence at all interviews and conduct case related quality reviews.

Statewide State Leads

- States agreed that the state team leads were engaged in more of a collaborative process with their federal counterparts than were the site leads. The state leads were universally included in the process; they were able to review cases, participate in discussions of ratings and findings and participate in interviews. However, it was noted that it was always clear that this was a *federal* review and that the state team leader was there to support the federal state team leader and the federal team.

First Level QA

- Ten states reported that site leaders were restricted and state advocacy limited in the first level case-related quality assurance (QA). This was attributed to a combination of factors:
 - There was only one state site leader permitted on each site and this person was primarily engaged in stakeholder interviews, limiting the time available for QA.
 - There was an implication that state site leaders were not encouraged or, in some cases, not allowed to do QA. At one site, the first level QA was done behind closed doors with

the federal consultant reviewers; at another site all state staff were excluded; and at another site the state site leader was told the instruments couldn't be downloaded to more than one computer. Two states asked if they could place an additional site leader to do QA and were denied on the premise that it would not be fair to other states that had not been permitted to do this or who did not have a sufficiently large workforce to do it.

- Three states reported that site leaders were involved in QA. Two of these states noted that this occurred because the state lead insisted that site leaders be involved in the first level QA process. State site leaders involved in QA reported a variety of experiences from working together with the federal site leads and learning from each other to being only able to look at a few cases.
- The interviewees for three states reported that they did not know about the state site leader involvement.

Site Level Stakeholder Interviewers

- Five states reported site leaders at one or more sites were restricted to observing or taking notes in stakeholder interviews.
- Four states reported that the federal site leader took responsibility for asking the questions but there was discussion and collaboration regarding the ratings.
- Four states reported that the state site leaders were able to ask questions and to interject clarifying comments regarding policy or regulations during the interviews and in the course of constructing notes. However, it was noted that there were so many interviews that it was difficult to check all the notes adequately for accuracy.
- One state reported that the state site leader was as equally involved as the federal site leader who conducted the interviews.
- The interviewees for two states reported that they did not know about state site leader involvement in stakeholder interviews.

C. Consistency Across Sites and States

Ratings

- Nine states found that outcomes and systemic factors were assessed in more or less the same fashion at all sites, with the caveat that there were small differences, but no more than one would expect given that the process is a subjective one.
- Seven states found that the application of rules was inconsistent:

- Some site leaders demonstrated flexibility discussing issues and being willing to use overrides while others did not.
- Interpretations of alternative responses varied.
- Whether or not contractual caseworker visits met the caseworker visit requirements varied.
- Some site leaders required more detailed case information for rating justifications than others.

There was no consensus on whether the federal consultant reviewers, cross state participants, or the state's own staff had the highest standards for the case related review. Differences were noted, but the differences were generally connected to the individual knowledge, experience and professional beliefs or biases of the reviewers. This individual subjectivity compromises the case related component of the CFSR.

- Four states believed that cross state reviewers or consultant reviewers who came from other states applied their home state's standards and/or policies to the case review process rather than adhering to the federal standards. The need for the training to include state policies was emphasized.
- Several interviewees noted that the federal staff (not federal consultants) were the most consistent.

Debriefings

Debriefings were conducted in many different ways across states and sites.

- Six states reported that daily debriefings were conducted according to the established guidelines, were productive, included open discussion of the cases, and developed themes that impacted outcomes .
- Eight states noted that daily debriefings were not conducted uniformly across sites in the state. Site leaders had different baselines contingent on the time crunch. Generally the daily debriefings were report outs of the outcomes but there were sites where reviewers were only able only to make partial presentations and unable to have case discussion. In some situations site leaders held the debriefing simply to ensure everything scheduled was done. In these latter situations the debriefings were noted to have no real benefits. At some sites debriefing went into the early morning hours and/or sites leaders split the debriefing session to get all the cases debriefed.
- Two state interviewees were unable to comment on the debriefings.

- There was confusion in some states about whether staff and stakeholders who were not members of the review team could attend debriefings and, if they did attend, whether or not they could participate in any way.

Local and State Exit Conferences

- Eleven states found no substantive differences between local and state exit conferences. Some of these states reported that both the local and state exit conferences were so general and superficial that they did not provide much clarity as to where the state stood.
- Five states noted that local exit conferences had more case related detail, while the state conference presented high level and thematic findings.

D. Verbal Reports, the Courtesy Report and the Final Report

A number of the interviewees were unable to comment on the differences between verbal reports, the Courtesy Report and the Final Report as many states had not received either at the time of the discussions. However, we did receive some feedback on the issue.

- Two states reported no substantive differences between the verbal and the Courtesy Report. Both states stated that they had made a few challenges to the wording of the Courtesy Report which were accommodated in the Final Report.
- General concerns states noted are:

The tone of the exit conferences were very positive and were generally more positive than they should have been based on the statewide debriefing in the morning. This left stakeholders confused when the more negative written reports were received.

- Individual statements of stakeholders from stakeholder interviews and case related interviews were sometimes included in the Courtesy Report in a manner that created concern that they would be interpreted as fact and/or reflective of case practice when the Final Report became public if left unchallenged. Few edits were accepted even when documentation of the inaccuracies was presented.
- There were issues addressed in the Final Report that were not noted in any of the onsite verbal report outs.

E. Round Two PIP Development

- Responding states reported good, supportive relationships for the PIP development process with the Children's Bureau Regional Office and the National Resource Centers (NRCs). PIP kickoff meetings, conference calls and follow-ups regarding progress on PIP development proceeded on schedule. Children's Bureau data staff have been very responsive and have provided additional data profiles upon request and responded immediately to questions.

- Although the PIP development process has generally been kept on schedule, the Courtesy and Final reports have been significantly delayed in most cases, and are often not received in time to be used effectively in PIP development. The concerns that generate from not having the final report during the PIP development process are:
 - Stakeholders, legislatures, and the media cannot be appropriately engaged in the PIP process. Stakeholders want to see the Final Report at the PIP kick off meeting and states would presumably be able to get and sustain better participation if the Final Report were available in a timely manner.
 - There is the risk of not targeting the areas needing improvement in the PIP that will be identified in the Final Report.
 - The onsite review instruments that document the case specific areas needing improvement are not released until after the Final Report, making it difficult to ensure that appropriate measures are implemented in a timely manner.
 - Courtesy reports cannot be released to stakeholders as states do not want to risk making public a report that might have inaccuracies.

Another significant PIP development challenge for the second round is the continued confusion about the PIP design. States report getting different directions as to the level of detail to include from different people in the same regional office and/or from the NRC. States further noted that some of the requirements for the PIP like requiring date, time, and minutes for planning meetings do not speak to program improvement. States argue that they are expending much time and energy in writing and rewriting that could be better used in development improvements.

F. Differences between Round One and Round Two

- Four states noted no difference between round one and round two.
- Twelve states noted differences as follows:
 - Round two was noted to be more of an audit with higher requirements for case documentation. For example, reviewers are less willing to accept verbal confirmation of case activities and signed documents had to be in place for alternate planned permanent living arrangements (APPLA) to be accepted as a goal.
 - Automation created more of a rigid, cookie cutter approach that allowed for review of files at a higher level, but with more emphasis on generating the ratings than on whether it was good case practice.
 - The revised on-site review instrument is more encompassing, requires more detail and sets higher standards. The detailed instructions that are included in the instrument with

each item are very helpful, but left the impression that the federal government is endeavoring to use the instrument to set policy rather than setting policy and developing the instrument to monitor compliance. Examples are:

- APPLA had to be documented (as aforementioned) but in some incidents was not accepted as a goal under any circumstances.
- Caseworker visits had to be conducted by the guideline in the instrument unless the state's standard was higher.
- Each parent or caregiver must be considered separately for all contacts and planning activities and the activity related to each parent or caregiver must be in compliance for Well-being I items 17, 18 and 20 to be found as strengths. Thus, the state can be penalized in more than one item for missing one case practice issue. There is emphasis on involving custodial and non-custodial parents, generally fathers. In some of these situations there were prior court rulings on custody and domestic violence issues and the courts would rather not see the matters reopened. There was variation between sites and states whether the site leaders would use the override in these situation when provided documentation.
- States with a multi track system presented issues around applying the instrument to cases that are opened for voluntary supportive services such as child mental health and juvenile justice issues. Because these cases were handled differently than typical child protective service cases for which the instrument is designed, the review of these cases often hurt the states' ratings.
- There was an emphasis on concurrent planning. Some site leaders required a concurrent plan be present in all cases. From a practice perspective and a regulatory standpoint, this is not a requirement.

Section III. Includes information from 34 of 45 responding States

H. State Quality System Reviews

Thirty-four of the 45 states interviewed were asked about their internal Quality Service Reviews (QSRs).

- Thirty-three of the 34 states queried about their internal QSR believe the PIP and the self assessment could both be driven from their internal reviews. The funds currently being used for the onsite could be channeled into services for improving outcomes.

Twenty-six states noted that they have QSR systems that are similar to or closely align with the CFRs. Because these systems can be used on a wider scale within states and can be tailored to fit each state, they could potentially provide information that is more accurate and relevant than what is gathered in the onsite component of the CFRs.

- States with multi track child welfare service systems have developed instruments to fully assess target state populations that the federal instrument is not applicable for – ICWA, mental health, juvenile justice and voluntary clients.
- States also conduct their QSR on a continual basis, gathering longitudinal data over the entire state and not just at specific sites.
- Three of these states are currently in the process of looking for an alternative to their current CFSR-based QSR. These states recognize the need to continue to effectively monitor their child welfare systems, but note that the CFSR type of review is both labor intensive and lacks flexibility in where the state needs to focus. In the end, the benefits may not warrant continuation as is.
- Seven states have QSR systems that do not look like the federal review. These states use a combination of internal data and case reviews to address all of the CFSR items. These states note that there is less drain on human resources when conducting reviews in this way.
- Only one state reported that they currently do not have an internal QSR but that state is in the process of developing a QA system.

Section IV. Includes information from all of the 45 responding States as applicable.

H. PIP Process and Penalties

Federal and state collaboration to avoid penalties was very good. States believed that their federal partners wanted them to succeed. In many instances, assistance was initiated and facilitated by the federal government to avoid penalties.

- Six states representing three different federal regions were assessed penalties in round one. Three of these states are in the process of appealing their penalties. Items out of compliance include: foster care re-entry, placement stability, caseworker visits with child and caseworker visits with parents. One state was successful in having the assessed penalty significantly reduced by providing alternate documentation and demonstrating that the regional office requirements had changed. Two states negotiated benchmarks throughout the process but were unable to meet the renegotiated goals and paid the penalty.
- Six states representing five different federal regions noted that they have not received a close out evaluation letter for their round one PIP and are concerned that a penalty will be assessed as they have not met all their benchmarks. Benchmarks and/or action steps were negotiated throughout the PIP and the Children's Bureau was very helpful, but at least one PIP item has still not been achieved for each of these six states. Four of these states noted that the anticipated penalty is for not reaching the reunification benchmark.
- Twenty-five states reported that they negotiated either action steps, benchmarks or both.

- Most states began negotiation as soon as they realized benchmark(s) might not be met and many continued to negotiate throughout the life of the PIP. A few states successfully negotiated in the last two quarters of their PIP for reduced targets that were achieved in the overlapping year.
- States that negotiated benchmarks and/or strategies reported that the negotiations were smooth. In some instances states noted that their regional office initiated the contact with them and made the suggestions for renegotiation; in others the state made the overtures to the regional office.
- It was difficult to determine from the reports which states actually had been assessed penalties, received warning letters or renegotiated upon realizing that they were not meeting benchmarks. Interviewees were unclear about what type of notices were received. Renegotiation strategies included the following:
 - Using internal qualitative and quantitative data measures to calibrate new baselines and to establish that the states were making improvements in outcomes and engaged in meaningful system reform.
 - Looking at data differently at the suggestion of the regional office to renegotiate for modifications to original benchmarks to establish achievable goals
 - Cleaning up data entry to establish an accurate baseline and then renegotiating for modifications to original benchmarks to establish achievable goals
 - Realizing the goals were not going to be met and negotiating benchmarks and/or performance measures down. The Children's Bureau Regional and or Central offices opened the negotiations to lower benchmarks with many states.
 - Changing strategies and action steps when the progress anticipated was not evident.
- Eight states reported that they had not entered into any negotiations as there was no penalty or potential penalty.
- Five states requested extensions and all were granted extensions. These states are included in the preceding penalty discussions.
 - Three of the extensions were based on hurricanes.
 - Two were granted because the state was very close to the goal on one item, had demonstrated effort to achieve the goal, and did achieve the goal in the extended timeframe.
- Renegotiations have been denied because

- Sufficient improvements had been made for the state to continue striving to meet the benchmarks as planned. If the state fails to meet the benchmarks in this situation, a penalty will be assessed.
- All action steps have been completed and the goal is not met.

I. *Concerns and Suggested Improvements*

Reviewers gain a good perspective on review cases from the CFSR. The question is: Do the benefits of the CFSR outweigh the concerns?

One state claims that there is nothing needed to improve the CFSR/PIP processes, and that the cost of the CFSR is well spent money. This state also argued that penalties are good and are needed to push the systems to change, and that states need the feedback from the CFSR process in order to move forward.

Other states noted the following concerns regarding the CFSR/PIP processes:

- Workforce
 - *Concern.* The onsite component of the CFSR creates significant workforce issues prior to and during the onsite. Prior to the onsite, staff are pulled for scheduling interviews, selecting reviewers, matching review pairs and selecting and preparing cases. These workforce issues are challenging when agencies are already so overloaded.
 - *Improvement.* Identify the sites and sample early as this enables the work to be distributed over time. Provide funds to enable all states to hire consultants/retirees to cover components of the CFSR work or job functions of the staff pulled for CFSR tasks.
- Workload
 - *Concern.* The intensive days compromise the validity of the reviews. There comes a point of diminished quality of the work affecting judgment and case related outcomes. Everyone gets tired by the end of the third 10 to 12 hour day. Time constraints can lead to errors in judgment. Three cases are too many. However, reducing the number of cases for each review pair would require more review pairs and the sites may not have physical space to accommodate them. The extended hours varied across sites and by team.
 - *Improvement.* Enable the number of cases per review pair to be reduced by making funds available to contract for additional space if needed to accommodate the additional review pairs or extend the review a few days. Look at using the states' internal Quality Service Review (QSR) to provide the information gathered during the case related component of the onsite. The applicability of states' QSRs will be discussed in detail under the Case Sample section which follows.

- Funding
 - *Concern.* Costs of hotels, transportation, food, paid overtime for extended days and possibly hiring consultants or bringing in retirees etc. creates a hardship on state budgets.
 - *Improvement.* In addition to providing federal funds to cover review costs (described more fully in the workload and workforce section) take seasonal issues into account when scheduling as this affects the cost of hotel rooms and availability of clients. It might be more economical to extend the review a few extra days than for states to pay overtime to staff during the review week.
- Review Findings
 - *Concern.* The inter-rater reliability of reviewers is not only affected by the long days but the experience, knowledge, and biases of each reviewer. Federal consultant reviewers who were trained in and work for other states will sometimes hold the state under review to their home state's standards and policies. This was particularly noted as a problem when reviewers came from states of significantly different size or a state with a different administrative structure. All reviewers bring their own professional leanings.
 - *Improvement.* Include more discussion on the items in the training – not just how to enter the information into the automated instrument. Training should clarify the federal standards and definitions. Federal consultants need to become familiar with the applicable policies for the state under review. Case review should not be used to evaluate the same areas that data can be used to evaluate. You can end up with conflicting information applicable to the national standards.
 - *Concern.* Single case related findings and stakeholder statements may be put forward as reflective of case practice or policies and used to drive PIP development. Stakeholder interviews are weighted too heavily in assessing systemic factors and this influences ratings. Statements made in interviews may be put forward in a manner that implies they are facts and conclusions. These statements, when listed in Final Reports, may be interpreted by stakeholders, including the media, as facts. Single issues found in a single case have been carried forward from one site as representative of a practice issue for the entire state. Individual case factors were carried forward and contributed to systemic factor ratings.
 - *Improvement.* Require collaborating information for all case findings and stakeholder statements before they are put forward in writing for public viewing.

The partnership model and the validity of the reviews would be improved by engaging local site leaders in the first level quality review of case instruments and in the stakeholder interviews. Local site leads can be particularly useful in these activities because they have the knowledge of state laws and policies and of local terminology, and can serve to clarify any questions that may arise throughout the process.

- Case Sample
 - *Concern.* The case sample is too small and not a reliable reflection of a state's case practice or demographic needs. States have concerns that such a case sample is used for PIP development and to drive case practice and make policy decisions. An adequate sample size is required to evaluate a system. The current sample causes different concerns in states with different demographics. For example, in a densely populated area the numbers are insufficient but in a rural site the numbers may require reviewing more than one case in a family or in the same worker's caseload. States are measuring the same thing in the Self Assessment that is measured in the onsite using a larger sample size.
 - *Improvement.* States now have the infrastructure for intensive self assessment that can go deeper than the CFSR and provide a more adequate sample that is more reflective of the state's practice. The reviews could be improved by an adaptation of the current CFSR process to utilize the states' QSRs to monitor cases and put the federal monitoring money into program improvements. Quantitative data should be used to measure as much as possible with a larger sample size and qualitative data should be limited to a manageable amount.

States have data to monitor the safety and permanency items. Thirty-three of the thirty-four states asked claimed that they have an internal QSR that could provide the information gathered by the onsite component of the current CFSR. To ensure the integrity of the review federal reviewers could come onsite to help with the internal QSR. This would be a helpful way to keep the momentum going and address monitoring issues for the Federal government and resource issues for the state. Federal standards could provide guidelines for an approved QSR.

- QA instrument
 - *Concern.* The QA instrument is being used to set policy rather than to as evaluate it. For example,
 - Item 19 suggests that all children should be seen once per month and contacts less than once per month should be rated ANI, but there is no federal policy regulation that says case work contact must be once a month like the standard contacts for foster children.
 - Not all cases reviewed are protective service cases. Some states supervise voluntary clients whose cases are opened for contracted services. Yet, all cases are held to the same standard.
 - States are held accountable to their own policies for safety response and thus the same case could be rated as an ANI in one state and as a strength in another that has lower standards. The same may be true for child worker visitation. If the state standard exceeds the federal requirement the state is held to that standard. This discourages

states from setting higher standards and actually creates an incentive to lower standards.

- *Improvement.* Even if a state aspires to a higher standard of self improvement than that required by the instrument definitions, that state should not be held to standards higher than the federal requirement for purposes of a federal review.
- Timeliness of Federal documents and feedback
 - *Concern.* PIPs are moved forward without the benefit of having the Final Report.
 - *Improvement.* Establish and enforce timely guidelines for the completion of the Final Report and other federal feedback such as the review of PIP drafts. Enable states to work directly with the Self Assessment when developing the PIP; it provides the same if not more information than the onsite component of the CFSRs. This would enhance the states' ability to sustain momentum when working with stakeholders.

Adapt the current process to enable the state site leaders to review the case instruments onsite. This would ensure that the state has more nuanced and reliable information regarding the findings that otherwise might not be available until after the Final Report is issued. This would not only provide the state with the detail needed to effectively work on specific PIP strategies, but also enable them to take action in a timely manner practice issues for children and families need to be addressed immediately.

If the federal timeline is not met, waive the PIP delivery date for the state so that they all have the same time for PIP development from the receipt of the final report.

- PIP development
 - *Concern.* There is confusion regarding PIP structure. Some states report receiving different guidance regarding PIP development from different people in the same regional office and the NRC. The level of detail being required in the PIPs seems to vary greatly from state to state. This is resulting in labor intensive rewrites that detract from the other work of the agency.
 - *Improvement.* There needs to be clarification regarding the detail required in PIPs. PIPs are the most useful for states when they allow for flexibility in evaluating and altering strategies as needed to ensure continuous improvement. States believe that identifying work in a few key areas that can be monitored for the effects they have on the targeted area and might have on linked areas would be the most effective use of resources.
- Data measures
 - *Concern.* Current measures are not reliable or valid for setting national standards for comparison.

First, the varied populations and policy standards throughout the nation are not conducive to reliable comparisons. States define their service population differently and operationalize service differently. For example, some states consider all maltreatment in institutions as maltreatment in foster care and others don't. Some states have alternative or differential response systems. These systems are used to respond to a variety of service needs that are defined differently in different states. Other states are multi track systems that service a broad spectrum of child welfare needs including juvenile justice, mental health and voluntary clients.

Second, states question if the measures in the CFSRs are the right ones, and if they are being used effectively to improve practice. Striving to achieve specific measures can sometimes drive practice in a negative direction. For example, keeping siblings together may require a longer period of time before permanency is achieved; improvements in re-entry may adversely affect the length of time in foster care and the number of children in foster care; kinship care is best practice but it can hurt permanency ratings because it usually increases the amount of time it takes to get children placed.

Third, comparing states to the national standard that there is continued failure to meet creates public relations media issues that can impact legislation and funding.

Fourth, the new AFCARS data measures may in part have been designed to set quantitative standards for the well-being items, but they are complex data fields that need to be checked for reliability before being applied to well-being outcomes.

– *Improvements.*

In order to be effective, comparative data needs to be drawn from a uniform population. For a national standard to allow for accurate comparisons, definitions of safety, permanency, and well being for the population need to be included in the data base. An alternative would be to use the current measures to evaluate improvement within the state and not as a national standard to compare states.

To improve outcomes we need to ensure that we are actually improving practice and not just numbers as they relate to National Standards. There needs to be carefully monitoring regarding the effect improvement in one area has on other areas. States need the flexibility of adjusting systems and practice to improve outcomes for families and children when these trends become evident without being concerned about incurring a penalty. Best practice requires responding to situations individually as well as applying practice standards.

• PIP penalties

- *Concern.* States are penalized or face potential penalties on data and a sample that are not necessarily reflective of state practice. States are held to different standards for improvement. The threat of penalties encourages states to hold back from setting high achievement expectations for themselves, because they don't want to reach for anything they are not sure they can accomplish. A state that is closer to meeting national standards

but did not meet their own benchmarks might face a penalty while others with lower benchmarks that show the negotiated improvement would not.

One state suggested that the penalties are good and necessary in order for systems to change. All other states noted that penalties don't make sense as they compound the problems – the federal government can't help families by withholding funds. States that have faced penalties noted that penalties are not the motivating factor for improvement. States as well as the federal government want to provide quality services and improve outcomes for children and families. States are facing resource issues and forced to cut back.

- *Improvement.* First, there should be consistency. Guidelines regarding the percentage of improvement need to be written rather than left to the discretion of each federal officer within the regional office.

It is universally acknowledged that some method of accountability is necessary for the expenditure of federal monies. Alternatives states suggested are:

- Incentives/rewards or other additional funds to improve resources.
- Reinvestment strategies. Outcomes for families cannot be improved with less money as resources are reduced. Two states suggested that we consider looking at reinvestment like that done with food stamp penalties. Rather than just taking the money away, give the state the option of having the NRC look at the root causes and require the state to implement a strategy for resolving the problems. The state would draw against its "sanction fund" to pay for the NRC technical assistance and to implement the program. Make the NRCs more available for onsite activities so they have an understanding of the demographic differences within the states for the targeted improvement areas
- Use report cards, create a media spotlight, and provide additional TA/T.
- Reset the standards to realistic, achievable ones and don't move the bar. Not meeting the standard is a negative media issue.
- Review the measures.
- Use penalty money to improve states' data and quality assurance and practice measures. Funds to make the system more outcome focused would be consistent with the review goals.
- States had to go to the expense of developing their own instruments to replicate the CFSR. It would be a great cost benefit if the automated federal instrument was given to the states and each state could just adapt it for state specific issues.