



Child and Family Services Reviews Procedures Manual

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U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children and Families
Administration on Children, Youth and Families
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Introduction

The Child and Family Services Reviews (CFSRs) are a Federal-State collaborative effort designed to help ensure that quality services are provided to children and families through State child welfare systems. The reviews identify strengths and areas needing improvement in State programs and systems, focusing on outcomes for children and families in the areas of safety, permanency, and child and family well-being. Following a review, States develop and implement Program Improvement Plans (PIPs), as needed. The Children’s Bureau; Administration on Children, Youth and Families (ACYF); Administration for Children and Families (ACF); U.S. Department of Health and Human Services (HHS), administers the reviews.

The *Child and Family Services Reviews Procedures Manual* was developed to offer an overview of the purpose and structure of the reviews. The manual is designed to assist Children’s Bureau staff and State child welfare agencies in planning for, and participating in, a CFSR.

State agency administrators are strongly encouraged to share the manual with agency staff who will plan for, or participate in, the State’s CFSR. The Children’s Bureau Central and Regional Office staff provide additional guidance to State child welfare agency staff through review planning conference calls and training about the onsite review process for State Review Team members. The Children’s Bureau Regional Office liaison for each review also coordinates the provision of technical assistance to States by the Children’s Bureau-funded National Resource Centers during the review process.

The manual is divided into seven chapters and nine appendices. Chapter 1 provides an overview of the CFSRs; subsequent chapters address key components of the reviews. While each chapter is designed to stand alone, the review components are interrelated. The sections containing information relevant to another chapter, therefore, are cross-referenced for ease of use.

The following are the contents of each chapter:

- Chapter 1 offers an overview of the purpose, principles, and structure of the reviews, and the steps in the review process.
- Chapter 2 provides information on the composition and functions of the Statewide Assessment Team, Onsite Review Team, and PIP Development Team.
- Chapter 3 explains the steps involved in conducting the Statewide Assessment, including preparing data profiles, analyzing data indicators, using the Statewide

Assessment to structure the onsite review, and completing interim and subsequent Statewide Assessments. It also provides guidance for Children’s Bureau staff on completing the Preliminary Assessment.

- Chapter 4 offers information about the onsite review, including planning, case selection and review, State and local stakeholder interviews, and team debriefings. It also briefly discusses the instruments used to conduct the onsite review.
- Chapter 5 provides guidance on the process used to determine substantial conformity with the outcomes and systemic factors, and the process for resolving discrepancies between the results of the Statewide Assessment and the onsite review.
- Chapter 6 provides information on the Final Report, which is developed following each State’s review, including the format, content, and preparation and distribution procedures.
- Chapter 7 covers the PIP content and format, strategies and the timeframe for developing the PIP, and PIP approval, reporting, evaluation, and renegotiation procedures.

The manual, and the review instruments and planning tools referenced in the manual, are available on the Children’s Bureau Web site. Specific Web site addresses are provided in Appendix A, Web Site Addresses for Documents Referenced in the *CFSR Procedures Manual*. These addresses are current as of the publication date. Because specific Web addresses can change, the Children’s Bureau Web site home page address (<http://www.acf.hhs.gov/programs/cb>) is provided throughout the text wherever the review instruments and planning tools are referenced. Moreover, the Children’s Bureau continually refines and enhances the instruments and planning tools used in the CFSRs. While some of these instruments and tools are included in the manual for the reader’s convenience, please check the Children’s Bureau Web site for the most recent version of each.

Contact information for key Federal staff responsible for administering the CFSRs and for Federal contractors referenced in this manual is available on the “CFSR Key Children’s Bureau and Federal Contractor Staff” page on the Children’s Bureau Web site at <http://www.acf.hhs.gov/programs/cb>.

Chapter 1

Framework for the Child and Family Services Reviews

The Federal Child and Family Services Reviews (CFSRs) are quality assurance reviews of State child welfare policy and practice. The reviews focus on how well States perform in achieving positive outcomes in the following three domains for children and families engaged in child welfare services: safety, permanency, and child and family well-being. The Children’s Bureau Central and Regional Office staff work in conjunction to provide guidance to State agency staff as they plan for and participate in this Federal review.

The reviews have been administered by the Children’s Bureau, Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), since 2000. On January 25, 2000, the HHS published a final rule in the *Federal Register* to establish the new review system. The final rule, which became effective March 27, 2000, is available on the Children’s Bureau Web site at <http://www.acf.hhs.gov/programs/cb>.

This chapter describes the purpose and history of the reviews; the central principles and concepts on which the reviews are based; the overall review structure, including the two phases of the reviews and the Program Improvement Plan (PIP) process; and the steps in the review process. Each phase of the review and the PIP process is described in more detail in subsequent chapters.

A. Purpose of the Reviews

The 1994 Amendments to the Social Security Act (SSA) authorized the HHS to review State child and family services programs to ensure substantial conformity with the State plan requirements in titles IV-B and IV-E of the SSA. Title IV-B of the SSA and 45 Code of Federal Regulations (CFR) §1357.15 require States to submit Child and Family Services Plans (CFSPs), that is, State title IV-B plans, to the ACF. Through the CFSRs, review teams assess child protective services, foster care, adoption, family preservation and family support, and independent living services. States found to be out of substantial conformity with the requirements must engage in a program improvement process, and technical assistance (TA) is available to assist States in addressing areas needing improvement.

In addition to reviewing for States’ substantial conformity with applicable requirements, the CFSRs are designed to help States improve child welfare services and the outcomes for

children and families who receive services. The review team identifies strengths of State programs and areas needing improvement. Other purposes of the reviews include:

- Ensuring that Federal funds are spent in accordance with Federal statute, regulation, and policy
- Linking the CFSRs to existing Children’s Bureau Regional Offices and State joint planning, TA, and program improvement processes
- Assisting States in becoming self-evaluating over time
- Collecting data that will inform national policy
- Providing timely and specific feedback to States that is directly related to program performance and outcomes

B. Conceptual Framework of the Reviews

The CFSRs are based on the following central principles and concepts:

- The CFSRs are a collaborative effort between the Federal and State governments. A Federal and State Review Team conducts the reviews and evaluates State performance. Typically, two teams (with some overlapping membership) conduct the review: (1) a Statewide Assessment Team, made up of State child welfare agency staff and external partners, and (2) an Onsite Review Team, made up of both Federal and State staff and their representatives. A PIP Development Team, made up of State child welfare agency staff and external partners, manages the PIP process, as needed. (Chapter 2 provides more information about each team.)
- The CFSRs are designed to examine State programs from two perspectives. First, the reviews assess the outcomes of services provided to children and families. Second, they examine systemic factors that affect the ability of State agencies to help children and families achieve positive outcomes.
- The review team collects information from a variety of sources in making decisions about a State’s performance. These sources include a Statewide Assessment, completed by the Statewide Assessment Team; case records and case-related interviews with children, parents, foster parents, caseworkers, and other professionals knowledgeable about the cases; data indicators; and interviews with State and local stakeholders.
- Through the reviews, the Children’s Bureau promotes States’ use of practice principles believed to support positive outcomes for children and families. These are family-centered practice, community-based services, individualizing services that address the unique needs of children and families, and strengthening parents’ capacity to protect and provide for their children.

- The CFSRs are designed to capture both State program strengths and areas needing improvement. The reviews include a program improvement process that States use to make improvements, where needed, and build on identified State strengths.
- The CFSRs promote State development of PIPs designed to strengthen States' capacity to create positive outcomes for children and families.
- The CFSRs emphasize accountability. While the review process includes opportunities for States to make program improvements before having Federal funds withheld for nonconformity, significant penalties are associated with the failure to make the improvements needed to achieve substantial conformity.
- The CFSRs promote ongoing State self-evaluation of programs and outcomes.

C. Collaborating During the Reviews

The CFSRs require a collaborative process that focuses on identifying shared goals and activities and establishing a purpose, framework, and plan for improving child welfare services. Most importantly, this collaborative process should result in changes that promote improved outcomes for children and families. The overarching principles guiding the CFSR collaborative process include:

- The safety, permanency, and well-being of children is a shared responsibility, and child welfare agencies should make every effort to reach out to other partners in the State who can help to achieve positive results with respect to the CFSR child welfare outcomes and systemic factors. (See Chapter 2 for examples of partners that may be included in the review process.)
- Child welfare agencies do not serve children and families in isolation. They should work in partnership with policymakers, community leaders, and other public and private agencies to improve outcomes for children and families in their States. This includes partnering with organizations that directly serve children, youth, and families, and those whose actions impact family and community life.
- Family-centered and community-based practices are integral to improving outcomes for children and families. As such, collaboration with families, including young people, is important in identifying and assessing strengths and barriers to improved outcomes for children, youth, and families.

Real collaboration has a purpose and a goal; it takes time and effort to promote meaningful collaboration. There also are varying degrees of collaboration, each of which can serve the CFSR process and, more importantly, children, youth, and families. (See Appendix J, Collaborating During the Child and Family Services Reviews, for more information on collaboration.)

D. Structure of the Reviews

The CFSRs comprise two phases: the Statewide Assessment, which the State completes in the 6 months before the onsite review, and the onsite review:

- In the first phase, the Statewide Assessment Team completes a Statewide Assessment, using data indicators to evaluate the programs under review and examine the systemic factors subject to review. (Chapters 2 and 3 provide more information about the Statewide Assessment Team and the Statewide Assessment, respectively.)
- In the second phase, the Onsite Review Team examines outcomes for a sample of children and families served by the State during a specific period (known as the period under review) by:
 - Conducting case record reviews and case-related interviews to assess the quality of services provided in a range of areas.
 - Conducting State and local stakeholder interviews regarding the systemic factors that affect the quality of those services (Chapters 2 and 4 provide more information about the Onsite Review Team and the onsite review, respectively.)

(For more information on the period under review, see Child and Family Services Review Technical Bulletin #2 (for reviews occurring in fiscal years 2007-2010) on the Children's Bureau Web site at <http://www.acf.hhs.gov/programs/cb>.)

A State determined not to be in substantial conformity with one or more of the seven outcomes or seven systemic factors under review then develops a PIP that addresses all areas of nonconformity. The State submits the PIP to the Children's Bureau Regional Office for approval within 90 calendar days of receiving the written notice of nonconformity. (The Final Report on the review serves as written notice of nonconformity. A courtesy copy of the report is provided to the State within 30 days of completion of the onsite review. See chapter 6.) The State then implements the approved PIP, including receiving TA as outlined in the plan. The Children's Bureau Regional Office monitors the plan's implementation and the State's progress toward PIP-specified goals. (Chapter 7 provides more information about the PIP.)

During both review phases and the PIP process, if necessary, States have access to TA provided by the Children's Bureau-funded National Resource Centers and coordinated through the Children's Bureau Regional Offices.

D.1. Outcomes and Systemic Factors

In the two phases of the CFSR, the review team assesses seven outcomes of child welfare services provided to children and families and seven systemic factors that affect the quality of those services. The information that the review team collects on the outcomes and systemic factors contributes to the overall determination regarding the State's substantial conformity.

D.1.1. Assessment of Outcomes

During the Statewide Assessment and onsite review, the review team assesses the following seven outcomes in three domains, safety, permanency, and child and family well-being, by examining 23 items:

- Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect.
- Safety Outcome 2: Children are safely maintained in their homes whenever possible and appropriate.
- Permanency Outcome 1: Children have permanency and stability in their living situations.
- Permanency Outcome 2: The continuity of family relationships and connections is preserved for children.
- Child and Family Well-Being Outcome 1: Families have enhanced capacity to provide for their children's needs.
- Child and Family Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.
- Child and Family Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

For Safety Outcome 2, Permanency Outcome 2, and the three Child and Family Well-Being outcomes, the qualitative information about the items related to each outcome, collected through the onsite case record reviews and case-related interviews, is used to determine substantial conformity (the percentage of cases reviewed in which the outcomes were determined to be substantially achieved).

Safety Outcome 1 and Permanency Outcome 1 are rated using the following set of performance indicators:

- Qualitative information about the items related to each outcome, collected through the onsite case record reviews and case-related interviews (the percentage of cases reviewed in which the outcomes were determined to be substantially achieved)
- Data indicators obtained from the Adoption and Foster Care Analysis and Reporting System (AFCARS) and the National Child Abuse and Neglect Data System (NCANDS) (the State's performance on the data indicators for which national standards have been established, as noted in the Statewide Assessment)

For example, in evaluating Safety Outcome 1, “Children are, first and foremost, protected from abuse and neglect,” the reviewers examine the following items and data indicators:

- Items
 - Item 1: Timeliness of initiating investigations of reports of child maltreatment
 - Item 2: Repeat maltreatment
- Data Indicators
 - Absence of maltreatment
 - Absence of child abuse and/or neglect in foster care

(See Appendix B, Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators, which provides a complete list of the performance indicators applicable to each outcome and systemic factor. See chapter 5 for more information on the national standards and determining substantial conformity.)

D.1.2. Assessment of Systemic Factors

The review team also assesses the following seven systemic factors that affect outcomes for children and families by examining 22 items (see Appendix B, Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators):

- Statewide information system
- Case review system
- Quality assurance system
- Staff and provider training
- Service array and resource development
- Agency responsiveness to the community
- Foster and adoptive parent licensing, recruitment, and retention

During the Statewide Assessment phase, States examine a set of CFSP and other program requirements for each of the systemic factors. During the onsite review, the Team Leaders and Local Site Leaders interview selected State and community stakeholders to determine how well each systemic factor functions. Decisions about a State’s substantial conformity with the systemic factors are based on whether these are in place and functioning satisfactorily. (See chapter 5 for more information on determining substantial conformity.)

For a complete list of the items that are considered under each of the systemic factors, see Appendix B, Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators.

E. Steps in the Review Process

The steps in the review process described below are conducted by the Children’s Bureau Central and Regional Offices, the State, or a Federal contractor, or are a shared responsibility. (More detail on key steps is provided in chapters 3–7 of the manual. In addition, see Appendix C, Timeframes for CFSR Activities, for a summary of the timeframes for the major CFSR activities.)

- **Determine the dates for the review.** The Children’s Bureau Central and Regional Offices determine the dates for the review, in collaboration with State child welfare agency officials. Reviews must be conducted within the timeframes specified in 45 CFR §1355.32.
- **Form the review team.** The review team comprises both Federal and State representatives. Federal representatives, selected by Federal staff, include Children’s Bureau Central and Regional Office staff and trained consultants. The State selects members for its Statewide Assessment Team, Onsite Review Team, and PIP Development Team. (See chapter 2 for more information on the teams.) The State teams include State agency staff and external partners, such as individuals who participate in developing the State’s CFSP.
- **Conduct planning conference calls.** The Children’s Bureau Central and Regional Office staff conduct a series of review planning conference calls with each State (formal review planning calls are held with each State to discuss State data issues, the Statewide Assessment, and onsite review planning functions; the Children’s Bureau staff also host additional calls with the State, as needed).
- **Transmit data profiles, selected from AFCARS and NCANDS, to the State.** To reduce the burden on the State, the Federal Government compiles data submitted by the State to AFCARS and NCANDS into safety and permanency data profiles that the State uses in completing its Statewide Assessment. For the initial review only, States were permitted to provide an alternate source of data in lieu of AFCARS data. For the initial and subsequent reviews, a State may provide an alternate source of data in lieu of NCANDS data.
- **Complete the Statewide Assessment.** The Statewide Assessment provides the State an opportunity to examine data indicators and other information, such as the input of a variety of stakeholders, regarding its programmatic goals and outcomes for children and families. The Statewide Assessment Team conducts the Statewide Assessment, with the support of the Children’s Bureau Regional Office. The team comprises representatives of the State child welfare agency and their external partners, such as the courts; tribes; mental health, health, and education agencies; and others involved in the State’s CFSP process. The Statewide

Assessment is a primary source of information for determining substantial conformity with regard to the systemic factors under review. (The Statewide Assessment Instrument is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.)

- **Designate sites for the onsite review activities.** The Children’s Bureau Central and Regional Office staff, and the State’s Statewide Assessment Team jointly identify three sites in the State where the onsite review activities will occur. The State’s largest metropolitan subdivision is a required site, and the other two sites are determined on the basis of information in the Statewide Assessment. (See chapter 3, section D.1., for more information on selecting sites for the review.)
- **Select the sample and types of cases to be reviewed on site.** The exact number of cases to be reviewed, by location and type of case (in-home services and foster care cases), is determined jointly by the Children’s Bureau Central and Regional Offices, and the State, on the basis of information in the Statewide Assessment. (See chapter 4, section C, for more information on case selection and review.)
- **Prepare and disseminate the Preliminary Assessment.** The Children’s Bureau Regional Office prepares an analysis of the Statewide Assessment on the Summary of Findings Form; this constitutes the Preliminary Assessment. The Children’s Bureau Regional Office provides the Preliminary Assessment to the Child Welfare Review Projects¹ for distribution to all members of the Onsite Review Team before the onsite review. (The Summary of Findings Form is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.)
- **Prepare for the onsite review.** The State selects the 65 cases for the onsite review from a sample of in-home services cases and foster care cases randomly identified by the Children’s Bureau. The State, in collaboration with the Children’s Bureau Regional Office, also schedules case-related interviews and State and local stakeholder interviews, prepares reviewer schedules, and plans logistical arrangements; for example, hotels and transportation for State Review Team members and space for meetings and review activities. The Children’s Bureau Regional Office collaborates with the Children’s Bureau Central Office, the State, and the Child Welfare Review Projects to ensure that all review-related preparation is completed. The Children’s Bureau Regional Office, for example, works with: (1) the Children’s Bureau Central Office to approve the site selection, (2) the State to assign reviewers to the local sites, and (3) the Child Welfare Review Projects to provide training about the onsite review to the State Review Team and distribute review-related materials before the onsite review.
- **Conduct the onsite review.** The onsite review comprises case record reviews; case-related interviews with children, parents, foster parents, caseworkers, and other professionals knowledgeable about the cases; and interviews with State and

¹The Child Welfare Review Projects support the Children’s Bureau in administering the CFSRs.

local stakeholders and agency officials. It is completed in 1 work week by the Onsite Review Team.

- **Complete and issue the Final Report.** The Children’s Bureau Regional Office, working with the Federal contractor responsible for preparing the initial draft of the report of the review, completes and distributes the report, which includes the written notice regarding substantial conformity. The report is distributed within 30 calendar days of the onsite review or 30 calendar days of resolving any discrepancies between the findings of the onsite review and the Statewide Assessment.
- **Develop the PIP, as necessary.** Within 90 calendar days of receiving written notice regarding substantial conformity, the State, in collaboration with its external partners, the Children’s Bureau Regional Office, and the Children’s Bureau-funded National Resource Centers, develops a PIP that addresses all areas of nonconformity, as determined through the review, and submits the plan to the Children’s Bureau Regional Office for approval. The Children’s Bureau Regional Office works closely with the State to produce a draft PIP for initial review within 30–60 days, when possible; this helps the State to finalize the PIP for ACF approval within 90 days.
- **Implement the PIP.** The State implements the approved PIP, TA is provided through the sources identified in the plan, and the Children’s Bureau Regional Office monitors implementation of the plan through quarterly reports and other methods addressed in the plan.
- **Withhold Federal funds for nonconformity.** If the State fails to make the improvements in the approved PIP within the timeframe specified in the PIP, or does not submit a PIP, Federal funds are withheld from the State commensurate with the level of nonconformity.
- **Conduct subsequent reviews.** A State found to be operating in substantial conformity with all seven outcomes and seven systemic factors during a review must undergo a full review every 5 years and submit a completed Statewide Assessment to the Children’s Bureau Regional Office 3 years after the onsite review. A State found not to be operating in substantial conformity on one or more outcomes or systemic factors during a review is required to undergo a full review 2 years after PIP approval.

Chapter 2

The Review Teams

Each Child and Family Services Review (CFSR) is a two-phase process that comprises a Statewide Assessment and an onsite review of child and family services outcomes and program systems. States determined not to be in substantial conformity with these outcomes and systemic factors then develop and implement a Program Improvement Plan (PIP).

The reviews are conducted jointly by Federal and State representatives, with Federal staff providing overall guidance during the planning and implementation of the review. During the review process, Federal and State teams conduct the activities associated with the two phases and the PIP process: these include a Statewide Assessment Team (State); Onsite Review Team (Federal and State); and PIP Development Team (State). States may appoint different personnel to each team; however, they are encouraged to provide some overlapping membership between teams to ensure the transfer of experience and knowledge. The Statewide Assessment Team, for example, is encouraged to begin thinking about the program improvement process during the Statewide Assessment phase.

The State child welfare agency administrator appoints a senior State staff person (State Lead) to provide oversight to the State teams and to all State review activities. This point person serves as the liaison to the Children’s Bureau Central and Regional Office staff, and Federal contractors; participates in all review-planning activities; and oversees, as appropriate, the staff designated to plan and conduct the review. This person also may serve as the State Team Leader during the onsite review (as described below), or the agency administrator may appoint another senior staff person to fill that role.

The State leadership then appoints members to the review teams. The Statewide Assessment Team and PIP Development Team are made up of State agency staff and representatives of the principal agencies, organizations, or groups working on child welfare issues in the State. The Onsite Review Team comprises both Federal staff and trained consultants and State and local child welfare agency staff and their external partners. (The consultants are part of a national pool of experienced child welfare professionals managed by the Child Welfare Review Projects.¹)

¹The Child Welfare Review Projects support the Children’s Bureau in administering the CFSRs.

The State leadership also assigns responsibility for establishing a communication system to ensure that information about the CFSRs is released to the media and the public throughout the review process.

This chapter describes the roles and responsibilities of the teams that conduct activities in each of the two review phases and the PIP process. Later chapters describe the responsibilities of these teams in the context of the review process: the Statewide Assessment Team's responsibilities in chapter 3; the Federal, State, and Federal contractor responsibilities in conducting the onsite reviews in chapters 4 and 6; and the PIP Development Team's responsibilities in chapter 7.

A. Composition of the Review Teams

The following factors should be considered in forming the Statewide Assessment, Onsite Review, and PIP Development Teams:

- To the extent possible, teams should be diverse in their membership, comprising individuals who represent the major populations served by the State.
- The Children's Bureau encourages cross-system coordination and consultation in States through the CFSR, as promoted by the title IV-B, subpart 2, planning process. To that end, the State should involve, on all three teams, individuals from outside the State agency who represent the planning team that developed the State's Child and Family Services Plan (CFSP) and Annual Progress and Services Reports (APSRs). To manage effectively the release of information to the media and the public throughout the review process, the State should consider keeping the State public information office or media relations staff apprised of the activities of the Statewide Assessment and PIP Development Teams.
- The State should select review team members who do not have potential conflicts of interest. Members of the Onsite Review Team, for example, should have no prior casework or supervisory responsibility in the site that they are assigned to review (as described in chapter 1, the onsite review takes place in three local sites; the review in the metropolitan site typically is conducted by two teams).

In addition, State staff are given the opportunity to review the list of cross-State participants and consultant reviewers selected to supplement the Federal component of the Onsite Review Team. This allows the State to ensure that these individuals do not have a conflict of interest with participating in the onsite review (for example, a consultant who was previously employed by the child welfare agency being reviewed or resides in or conducts child welfare-related business in the State under review).

- Staff or consultants of the Children's Bureau-funded National Resource Centers (NRCs) may not serve on the Onsite Review Team. (The NRCs can provide technical assistance [TA] to a State as part of the CFSR process.) This ensures that no conflict of interest exists if, following a review, the State receives TA from the NRCs. The same applies to other TA providers that the State may hire to assist in

developing a PIP or conducting other child welfare improvement planning following the review.

All review team members receive an orientation to and/or training about key components of the CFSRs. The State child welfare agency provides an orientation to the Statewide Assessment and PIP Development Teams. The Children's Bureau Regional Office and Children's Bureau-funded National Resource Centers can provide support to the State child welfare agency in preparing these orientations. The Children's Bureau, via the Child Welfare Review Projects, provides training to consultants and the State members of the Onsite Review Team regarding the onsite review.

The following sections describe the structure and functions of each of the review teams.

B. Statewide Assessment Team

B.1. Structure

States must include broad representation from within and outside the child welfare agency in forming a team to conduct the Statewide Assessment. The team should include representatives of organizations consulted in developing the CFSP and APSRs and who are expected to be involved in developing and implementing the PIP. States also should consider including on the Statewide Assessment Team individuals from within and outside the State child welfare agency who have the skills and background to serve as case record reviewers and interviewers and who are available to serve on the Onsite Review Team.

The following are suggested participants in the Statewide Assessment Team:

- Administrators and program specialists from the State and local child welfare agencies
- State and local agency staff with expertise in areas examined during the Statewide Assessment, such as information systems, quality assurance, training, and licensing
- Local child welfare agency staff who have knowledge of front-line practice and supervisory issues
- Judges and other court-related personnel, especially staff of the State's Court Improvement Program (CIP)
- Representatives of the major domains outside child welfare that are addressed in the Statewide Assessment, such as education, health, mental health, substance abuse treatment, domestic violence prevention, and juvenile justice
- Tribal representatives

- Legislative personnel who focus on child welfare issues or funding issues that affect child welfare
- Advocacy groups and consumer representatives, including children and youth in foster care or the groups that represent them
- Service provider representatives, including foster and adoptive families
- University or research-related partners of the State involved in data collection and analysis, training activities, or other relevant areas
- Partners that represent the diversity of the State's population, especially in relation to those served by the child welfare system

B.2. Functions

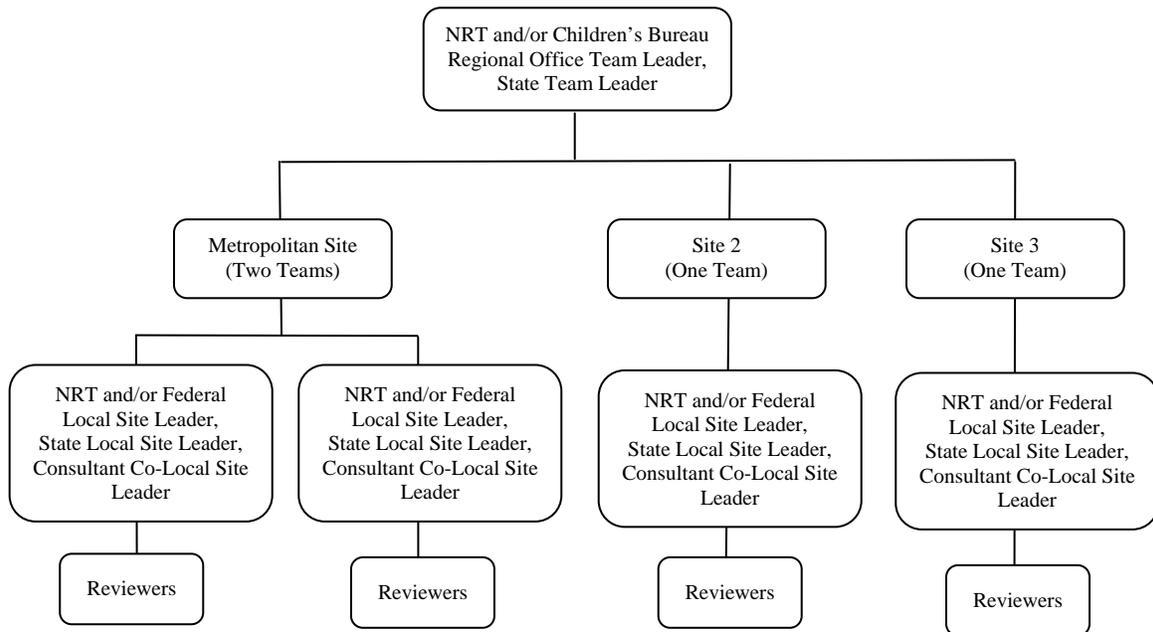
Members of the Statewide Assessment Team may engage in the following types of activities:

- Participate in training or orientation sessions
- Attend meetings related to the Statewide Assessment or the review process
- Analyze the data related to outcomes and systemic factors
- Collect additional data as needed
- Gather information pertaining to the agency's performance, such as conducting or participating in focus groups, surveys, or interviews
- Develop, review, and comment on drafts of the Statewide Assessment
- Participate in conference calls with Federal staff during the Statewide Assessment process (Statewide Assessment Team leadership only)
- Make recommendations pertaining to the onsite review, such as sample composition, site selection, and Onsite Review Team composition
- Identify the State's strengths and areas needing improvement on the basis of data and information gathered for the Statewide Assessment
- Explore strategies for possible program improvement efforts in areas identified as needing improvement, and make preliminary recommendations to the State's PIP Development Team

C. Onsite Review Team

C.1. Structure

The Onsite Review Team comprises both Federal and State staff, with trained consultant reviewers supplementing the Federal component of the team. Federal staff select the Federal and consultant reviewers, while State agency officials choose the State Review Team members, who may be State agency staff or external representatives. The overall team is divided into four local site teams; two teams operate at the metropolitan site and one each at the other two local sites. The chart below shows the structure of the Onsite Review Team.



The following are the roles of the Onsite Review Team members:

- Team Leaders:
 - National Review Team (NRT) Team Leader: A Federal agency representative who provides overall leadership for the onsite review and is a member of the NRT. The NRT comprises staff from the Children's Bureau Central and Regional Offices who provide leadership to the review teams in planning and conducting the CFSRs.
 - Children's Bureau Team Leader: A Children's Bureau Regional Office representative who assists in providing overall leadership for the onsite review.
 - State Team Leader: A State agency representative who serves as the State's lead representative for the onsite review.

- Local Site Leaders:
 - NRT Local Site Leaders: Four Federal representatives from the NRT, each of whom provides overall leadership to a review team in one of the three local review sites (there are four onsite review teams; the review in the metropolitan site typically is conducted by two teams).
 - Federal Local Site Leaders: Additional Federal representatives may assist in providing leadership to a review team in one of the three local sites. One of the individuals filling this role at each site may be a high-performing and specially trained Consultant Co-Local Site Leader identified by the Children’s Bureau.
 - State Local Site Leaders: Four State agency representatives, each of whom serves as the State’s lead representative for a review team in one of the three local sites. The State Local Site Leaders work closely with the NRT Local Site Leaders during the onsite review. While most State Local Site Leaders participate in the quality assurance reviews of completed Onsite Review Instruments and participate in stakeholder interviews, their role on site otherwise varies by review. The NRT Local Site Leader and State Local Site Leader jointly determine the best role for the State Local Site Leader at each site.
- Reviewers: Review team members who conduct case record reviews and case-related interviews at one of the three review sites. Reviewers include the following:
 - Federal agency representatives or specially trained consultants with skills and experience in the child welfare field
 - State representatives, who are State child welfare agency staff or representatives of the agency’s external partners in the CFSP planning process

The Onsite Review Team also may include the following individuals, who supplement the Federal Review Team during the onsite review:

- Children’s Bureau Regional Office staff from Regions other than the one responsible for the State being reviewed: Children’s Bureau Regional Office staff may participate in reviews outside their own Region for training purposes (at the expense of the Children’s Bureau Regional Office) or to provide specialized experience to the review. The Children’s Bureau Regional Office forwards requests to have staff participate in a review in another Region to the Children’s Bureau Central Office through the Children’s Bureau Regional Office responsible for the State that is being reviewed.
- State child welfare staff from States other than the State being reviewed (cross-State participants [CSPs]): States preparing to conduct reviews may find it helpful

to send CSPs (especially staff who will serve as the State Team Lead for the review) to reviews in other States (at the expense of the CSP's State) to help prepare and train them for their own reviews. States that are interested in sending a CSP(s) to a review in another State should make CSP requests to the Children's Bureau Regional Office in the Region in which they are located. CSPs must be experienced in child welfare; accountable to the State child welfare agency that they represent on an administrative, policy, or training level; and engaged in assisting the State agency in planning for and managing the CFSR.

The participation of Children's Bureau Regional Office staff from other Regions and CSPs is subject to the approval of the Children's Bureau Central and Regional Offices and the availability of reviewer positions on the review team; CSPs also must participate in training provided through the Child Welfare Review Projects.

In all, the Onsite Review Team comprises approximately 65 people. About half of these are Federal representatives, and half are State representatives: 23 Federal reviewers, 23 State reviewers, 3 Team Leaders (2 Federal representatives and 1 State), and up to 4 Local Site Leaders for each of the 4 teams that operate in the 3 sites. These numbers are subject to adjustment, depending on variations among State reviews, such as the sample size and logistical issues, and the structure of the review team in the State's largest metropolitan site.

In addition, State staff members in each of the three review sites serve as Local Site Coordinators, who are responsible for setting up interviews, making logistical arrangements, and ensuring that case records are available to be reviewed. (Local Site Coordinators are not members of the Onsite Review Team.)

C.2. Functions

C.2.1. Team Leaders

As mentioned above, a designated NRT member leads each onsite review, serving as the NRT Team Leader. A Children's Bureau Regional Office staff person and State child welfare agency staff person serve as the Children's Bureau Regional Office Team Leader and State Team Leader, respectively. Team Leaders have the following responsibilities:

- Serve as liaisons with the State leadership in planning review activities. (The Children's Bureau Regional Office Team Leader assumes primary responsibility for this function.)
- Ensure that the State completes the Statewide Assessment, using the Statewide Assessment Instrument found on the Children's Bureau Web site, and sends it electronically to the Children's Bureau Regional Office 60 days before the onsite review. (The Children's Bureau Regional Office Team Leader assumes primary responsibility for this function, in collaboration with the NRT Team Leader and the Children's Bureau data staff.)

- Provide guidance to the State Team Leader during the Statewide Assessment process, and review and comment on drafts of the Statewide Assessment. (The NRT Team Leader and Children’s Bureau Regional Office Team Leader assume primary responsibility for this function.)
- Prepare an analysis (Preliminary Assessment) of the Statewide Assessment 30 days before the onsite review, and record it on the Summary of Findings Form. (The Children’s Bureau Regional Office Team Leader prepares this document.)
- Plan the details of the onsite review with the Children’s Bureau Central and Regional Offices, State child welfare agency, and Child Welfare Review Projects, including arranging conference calls as needed and transmitting review instructions and procedures to State liaisons. (The Children’s Bureau Regional Office Team Leader assumes primary responsibility for this function.)
- Participate in a series of review planning conference calls with the Children’s Bureau Central and Regional Office staff, and the Child Welfare Review Projects. Formal review planning calls are held with each State to discuss State data issues, the Statewide Assessment, and onsite review planning functions. The Children’s Bureau Central and Regional Office staff also host additional calls with the State to discuss other issues, as needed. (The NRT Team Leader, Children’s Bureau Regional Office Team Leader, State Team Leader, and other designated State staff participate in the conference calls.)
- Work in collaboration with the State Team Leader to ensure that the stakeholders to be interviewed at the State and local sites include agency staff who are responsible for, or have firsthand knowledge about, the systemic factors that will be evaluated during the onsite review, such as training and quality assurance. (The Children’s Bureau Regional Office Team Leader assumes primary responsibility for this function.)
- Ensure the participation of all State Review Team members in a 1-day training offered by the Children’s Bureau via the Child Welfare Review Projects. (The State Team Leader assumes primary responsibility for this function.)
- Work with the Child Welfare Review Projects to ensure that all documents needed for the review are sent to the NRT Local Site Leaders at a predetermined location. (The Children’s Bureau Regional Office Team Leader assumes primary responsibility for this function.)
- Ensure that the Local Site Leaders are aware of their responsibilities during the onsite review; see the Local Site Leader responsibilities below. (The NRT Team Leader assumes primary responsibility for this function.)
- Conduct State-level stakeholder interviews during the onsite review. (The NRT Team Leader, Children’s Bureau Regional Office Team Leader, and State Team Leader jointly participate in interviews.)

- Perform and/or oversee a statewide quality assurance review of all completed Onsite Review Instruments to identify missing information and/or inconsistencies in completing the Instruments and ensure that the items and outcomes are rated correctly. (The NRT Team Leader, Children’s Bureau Regional Office Team Leader, and State Team Leader participate in quality assurance reviews of Instruments.)
- Provide leadership for the statewide exit conference that is held during the onsite review. (The NRT Team Leader assumes primary responsibility for this function; see chapter 4, section F, for information on exit conferences.)
- Identify possible promising child welfare approaches (See chapter 4, section E, for information on promising approaches.) (The NRT Team Leader and Children’s Bureau Regional Office Team Leader share this responsibility.)
- Serve as the primary liaison with the Federal contractor responsible for preparing the initial draft of the Final Report, review and comment on drafts, rate systemic factors and indicators, determine whether all ratings in the report are accurate, transmit a courtesy copy of the Final Report to the State, and secure needed Children’s Bureau Central and Regional Office approval of the report. The Children’s Bureau Regional Office transmits the official copy to the State and other required parties. (See chapter 6, section D, for information on the distribution of the Final Report.) (The NRT Team Leader and Children’s Bureau Regional Office Team Leader assume responsibility for this function.)
- Act as the liaison between the Children’s Bureau Central and Regional Offices and State in the event of discrepancies between information in the Statewide Assessment and the onsite review findings, and work toward resolution of the discrepancies. (The NRT Team Leader and Children’s Bureau Regional Office Team Leader work collaboratively on this function; see chapter 5, section C, for more information on resolving discrepancies.)
- Work with designated State staff to develop the PIP. (The Children’s Bureau Regional Office Team Leader assumes primary responsibility for this function, in collaboration with the Children’s Bureau Central Office.)

C.2.2. Local Site Leaders

The Onsite Review Team is divided into local teams that are assigned to the three review sites. A designated NRT member leads each local team, serving as the NRT Local Site Leader. Children’s Bureau Regional Office staff and a specially trained consultant may serve as Co-Local Site Leaders with the Federal Local Site Leader, and a State child welfare agency staff person serves as the State Local Site Leader. Local Site Leaders have the following responsibilities:

- Participate, as asked, in a series of review planning conference calls with the Children’s Bureau Central and Regional Office staff. (The NRT Local Site

- Leader, Federal Local Site Leaders, and State Local Site Leader participate in this function.)
- Conduct the local entrance conference to provide an overview of the review week and highlight State-specific issues before beginning review activities, and conduct the local exit conference to share preliminary findings. (The NRT Local Site Leader assumes primary responsibility for this function.)
 - Conduct stakeholder interviews at the local site. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share this responsibility.)
 - Provide strong, positive leadership to the team by setting the pace of work for the week, assisting members in resolving problems with their schedules or in reviewing their cases, supporting the team in completing its work, and promoting a positive and objective approach to the review. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share this responsibility.)
 - Coordinate the review schedule with local agency staff, including ensuring that the Local Site Coordinator: (1) confirms interview arrangements and (2) adjusts schedules, including those for local entrance and exit conferences, as needed. (The State Local Site Leader assumes primary responsibility for this function, in collaboration with the NRT Local Site Leader and Federal Local Site Leaders.)
 - Provide leadership for any scheduled focus groups, open forums, or discussion groups arranged as part of the local review week, such as facilitating discussions, debriefing teams, summarizing findings, and presenting findings at the local exit conference. (The NRT Local Site Leader assumes primary responsibility for this function.)
 - Coordinate team members' responsibilities for case record reviews, case-related and stakeholder interviews, and other review activities at the local sites, distributing the workload to ensure that all tasks are accomplished on time. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share this responsibility.)
 - Assist reviewers in resolving issues pertaining to completing the Onsite Review Instruments and gathering information for the Instruments. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share this responsibility.)
 - Identify possible promising child welfare approaches. (See chapter 4, section E, for information on promising approaches.) (The NRT Local Site Leader and Federal Local Site Leaders assume responsibility for this function.)
 - Perform quality assurance reviews of all Onsite Review Instruments, as they are completed, to identify missing information and inconsistencies in completing the Instruments and ensure that the items and outcomes are correctly rated. In addition, perform second-level quality assurance reviews of Instruments from

other review sites, as requested by the NRT Team Leader. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader participate in this function.)

- Convene and lead daily debriefings with local team members during the onsite review. (The NRT Local Site Leader assumes primary responsibility for this function.)
- Receive and screen case-related concerns that reviewers may have regarding child safety or the inclusion of the case in the sample, and bring those concerns to the NRT Team Leader and an appropriate staff member of the local child welfare agency. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share responsibility for this function.)
- Coordinate the completion of the Summary of Findings Form for the local team at the end of the review week, including providing all local team members with opportunities for input into the document. (The NRT Local Site Leader assumes primary responsibility for this function.)
- Ensure that team members complete all assigned review functions, including completing and submitting all review Instruments, before departing the review site. (The NRT Local Site Leader, Federal Local Site Leaders, and State Local Site Leader share this responsibility.)
- Submit local review team members' completed Onsite Review Instruments and Stakeholder Interview Guides, and the team's Summary of Findings Form, electronically to the designated Team Leader before the statewide exit conference. (The NRT Local Site Leader assumes primary responsibility for this function.)
- Ensure that a process for shredding all case-identifying materials is in place and used by reviewers before leaving the State. (The State Local Site Leader assumes primary responsibility for this function.)

C.2.3. Reviewers

Onsite Review Team members have the following responsibilities:

- Participate in scheduled orientation or training sessions before the review. Children's Bureau Regional Office staff participate in trainings provided by the NRT. Consultants and CSPs attend a training conducted by the Child Welfare Review Projects. State members of the Onsite Review Team attend a 1-day training about the onsite review, which is provided by the Child Welfare Review Projects approximately 2 weeks before the review.
- Review the completed Statewide Assessment and Preliminary Assessment, and other materials provided by the Children's Bureau Regional Office through the Child Welfare Review Projects, in preparation for the onsite review.

- Remain present and free of other responsibilities at the review site for the entire week of the onsite review, including participating in all scheduled review activities, from the entrance conference through the final local site debriefing held on Thursday, unless otherwise instructed by the NRT Local Site Leader.
- Conduct all assigned activities associated with reviewing case records and conducting case-related interviews, including completing the Onsite Review Instruments.
- Work closely with Federal or State partners in making decisions regarding distributing the workload and completing the review instruments. (Case record reviews are conducted by pairs of reviewers, comprising one Federal Review Team member and one State Review Team member.)
- Participate, as requested by the Local Site Leaders, in focus groups, open forums, or other group meetings scheduled during the onsite review.
- Attend daily debriefings of the local review teams, and present information on cases reviewed.
- Notify the Local Site Leaders about previous casework or supervisory responsibility for a case being reviewed by any member of the team, and refrain from attending debriefing sessions when the case is debriefed.
- Notify the Local Site Leaders if a child's safety might be at risk.
- Bring to the attention of the Local Site Leaders any cases that appear to be in the sample in error; for example, a foster care case in which the child and family actually were receiving in-home services.
- Assist in compiling a summary of the team's findings during the onsite review.
- Be alert for promising child welfare approaches during case record reviews and case-related interviews, and inform the designated Local Site Leader about promising approaches identified. At the final review team debriefing at each local site, the NRT Local Site Leader facilitates a discussion of promising approaches that the review team identified.
- Submit completed review instruments on assigned cases to the designated Local Site Leader before departing the review site at the end of the onsite review.
- Remain available for telephone consultation following the review, if needed, to clarify or supplement information recorded on the instruments.

C.2.4. Local Site Coordinator

The State assigns a Local Site Coordinator to manage the logistical arrangements for each of the three review sites. These Local Site Coordinators are State staff members whose functions are different from those of the State Local Site Leader; the Local Site

Coordinators are not members of the Onsite Review Team, but are the review team's liaison to the child welfare agency at the review sites.

The Local Site Coordinators have the following responsibilities:

- Orient local child welfare agency staff about the review.
- Manage the process for selecting cases at the local site.
- Schedule review week activities, including the local entrance and exit conferences and local stakeholder interviews, and prepare reviewer schedules.
- Plan and manage the review week logistics, such as booking sleeping rooms for State Review Team members and arranging transportation to and from interviews; and coordinate with the Child Welfare Review Projects regarding logistical arrangements.
- Reserve space for all onsite review activities, including meetings, case record reviews, debriefings, and some interviews, as necessary.
- Assemble the case records selected for review.
- Handle the rescheduling of interviews as necessary during the onsite review.
- Provide general support to the Onsite Review Team.

D. PIP Development Team

D.1. Structure

The State should consider which individuals will serve on the PIP Development Team, as necessary, when composing its Statewide Assessment and Onsite Review Teams. This will enable the State to begin focusing on the program improvement process during the two phases of the review process. Moreover, the PIP Development Team then will comprise individuals who have experience with, and knowledge about, the overall review process and findings.

The following are suggested participants on the PIP Development Team:

- Administrators and program specialists from the State and local child welfare agencies
- State and local quality assurance staff
- Local child welfare agency staff with front-line supervisory and practice experience

- Representatives of major domains outside child welfare that will need to be addressed through the PIP, including the courts, law enforcement, education, health, mental health, substance abuse, domestic violence, and juvenile justice
- Researchers and evaluators, who have a child welfare focus, from within State government and/or on loan from a local university
- Tribal representatives
- Advocacy groups and consumer representatives, including children and youth in foster care or the groups that represent them
- Legislative and policy personnel who focus on child welfare issues and/or funding

D.2. Functions

PIP Development Team members have the following responsibilities:

- Participate in training or orientation sessions for the PIP Development Team members.
- Stay apprised of the review process.
- Attend meetings related to the PIP process.
- Analyze the Final Report to determine areas needing improvement that will need to be addressed in the PIP (see chapters 6 and 7 regarding the Final Report and PIP process, respectively).
- Assist in developing and implementing the PIP, including planning the PIP evaluation process and benchmarks and monitoring PIP progress, as appropriate.

Chapter 3

Statewide Assessment

The Statewide Assessment is the first phase of the Child and Family Services Reviews (CFSRs) and is conducted during the 6 months preceding the second phase, the onsite review. In conducting the Statewide Assessment, the Statewide Assessment Team uses data indicators and other qualitative information to assess the impact of State policies and practices on the children and families being served by the State child welfare agency. (See chapter 2, section B, for information on the Statewide Assessment Team.)

The Statewide Assessment provides States an opportunity to examine data and qualitative information related to their child welfare programs in light of their programmatic goals and desired outcomes for the children and families that they serve. The Statewide Assessment serves the following purposes:

- Provides States the opportunity to build capacity for continuous program evaluation and improvement
- Helps prepare the Onsite Review Team for the onsite review by providing evaluative information regarding the child welfare agency's policies, procedures, and practices
- Provides a basis for making decisions regarding substantial conformity with the seven systemic factors, in conjunction with the information obtained from the onsite review (see chapter 1, section D, for information regarding the structure of the reviews)
- Identifies issues that require clarification and that therefore may need to be addressed through the training of State Review Team members conducted by the Child Welfare Review Projects¹

The Statewide Assessment Team uses a Statewide Assessment Instrument to record: (1) qualitative, evaluative, and quantitative information regarding the State's outcomes for children and families served, (2) systemic factors that affect the State's ability to provide services, (3) State strengths and areas needing improvement, and (4) issues for

¹The Child Welfare Review Projects train State agency staff on the CFSRs on behalf of the Children's Bureau.

further examination through the onsite review. The Instrument, which is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb, is designed to assist States in completing their Statewide Assessment in an evaluative manner. The Instrument includes a series of narrative-style questions and instructions on documenting data indicators. The Statewide Assessment Team should complete the Statewide Assessment and should be the primary group that responds to the narrative questions.

This chapter provides an overview of the process for completing the Statewide Assessment, including the preferred format. It describes the major steps in the process, including preparing and analyzing the data used in completing the Statewide Assessment, using the Statewide Assessment to structure the onsite review, and completing interim and subsequent Statewide Assessments. It also provides guidance to Children’s Bureau Regional Office staff on completing the Preliminary Assessment.

A. Completion of the Statewide Assessment

A.1. Statewide Assessment Process

States should use the following steps in completing the Statewide Assessment:

1. Identify key agency staff and community representatives (such as those serving on the title IV-B planning committee) to serve on the Statewide Assessment Team. Agency staff should be selected on the basis of their expertise, for example, in quality assurance or foster care.
2. The Statewide Assessment Team also must include State representatives who are not staff of the State child welfare agency (external partners or stakeholders), pursuant to 45 CFR §1355.33(b). Those individuals should represent the sources of consultation required of the State in developing its title IV-B State plan and should include tribal representatives, court personnel, youth, staff of other State and social service agencies serving children and families, and birth, foster, and adoptive parents or representatives of foster or adoptive parent associations.
3. Examine existing State documents that provide information about the State agency during the period under review. These might include, for example, the title IV-B plan, management reports, studies, commission reports, and task force findings.
4. Receive and analyze the data provided by the Children’s Bureau through the Regional Office:
 - Review the data indicators related to Safety Outcome 1 and Permanency Outcome 1 in the Onsite Review Instrument, identify areas of strength and those that warrant further examination during the onsite review, and identify the reason(s) for the status of the data indicators.
 - Compare the State’s performance on the data indicators with the national standards, where applicable. The State needs to address, in a Program

Improvement Plan (PIP), indicators that fall below the national standards. (See chapter 5 for more information on the national standards.) It is important, therefore, for the State to identify the factors affecting these indicators.

5. Collaborate with external partners regarding the data indicators. The team conducting the Statewide Assessment, for example, might talk with judges and foster parents about the reasons that a significant number of children have multiple placement settings. The State also should collaborate with partners to obtain information to complete the narrative sections of the Statewide Assessment on systemic factors.

States are encouraged to use a variety of approaches in collaborating and consulting with external partners. The agency might gather information through the following, for example:

- Holding focus groups with stakeholders or consumer groups
- Conducting surveys
- Hosting joint planning forums within the State
- Developing other strategies for linking the Statewide Assessment with the ongoing consultation process used for title IV-B planning

A.2. Format of the Statewide Assessment

States use the Statewide Assessment Instrument to guide and document their evaluation of the child welfare agency's policies and practices. The instrument is divided into the following five sections:

- I. **General Information:** States provide information about the child welfare agency.
- II. **Safety and Permanency Data:** States examine and report on their foster care and child protective services populations using the safety and permanency profiles provided by the Children's Bureau's data team.
- III. **Narrative Assessment of Child and Family Outcomes:** States use the questions in this section to examine their data in relation to the three outcome areas under review.
- IV. **Systemic Factors:** States provide narrative responses to questions about the seven systemic factors under review.
- V. **State Assessment of Strengths and Needs:** States answer questions in this section about the strengths of the agency's programs and areas that may warrant further exploration through the onsite review.

A completed Statewide Assessment should be approximately 75–85 pages. States should use the Statewide Assessment Instrument, integrating information from other written sources rather than attaching other documents, whenever possible. The Statewide Assessment should contain the following:

- A brief description of the agency structure and programs
- Information on the relationship between the data and the State’s practices and policies
- Information on the effectiveness of the systemic factors being reviewed
- The State data profile

For each systemic factor, the State should provide the following:

- Overview of the system under review, including the requirements, structure, law, policy, and functions
- Information on how well the system works, including strengths, gaps, needs, and usefulness
- Information on how the State’s functioning in the systemic area affects the outcomes of safety, permanency, and child and family well-being
- Information on ongoing processes or mechanisms, such as the State’s quality assurance system, that routinely examine the effectiveness of the systemic factor and promote continuous improvement in that area

The completed Statewide Assessment should clearly show an analysis of the relationship between State data and practice, and the quality and effectiveness of the system under review. For example, if a State’s data show that children have frequent re-entries into foster care following reunification, the State should use the Statewide Assessment process to explore, and then document, the possible reasons that this is occurring. To do so, the State might examine the availability, accessibility, and quality of services to support family reunification. Or if the State’s data show that children wait long periods for permanent placements, the State might explore the case review system and its effectiveness in moving children to permanency in a timely manner.

B. Preparation and Analysis of Data for the Statewide Assessment

The Statewide Assessment includes data that the Children’s Bureau extracts from the Adoption and Foster Care Analysis and Reporting System (AFCARS) and the National Child Abuse and Neglect Data System (NCANDS) Child File (the case-level component of NCANDS) and transmits to the State in report format. AFCARS data are used to develop a permanency profile of the State’s foster care populations, and NCANDS data are used to develop a safety profile of the child protective services population. For the initial review only, the Children’s Bureau could approve another source of data for the

permanency profile in the absence of AFCARS data. For both the initial and subsequent reviews, the Children’s Bureau may approve another source of data for the safety profile in the absence of NCANDS data.

The data profiles include data indicators that are used to determine substantial conformity. The Children’s Bureau has established national standards for each of the data indicators used to determine substantial conformity. When a State is undergoing a CFSR, the Children’s Bureau Regional Office and the State compare the State’s data for the period under review with the national standards to determine the State’s substantial conformity with these standards. (See chapter 5 for information on the national standards and determining substantial conformity.)

B.1. Preparation of the Data Profiles

Six months before the onsite review, the Children’s Bureau Regional Office transmits to the State the AFCARS and NCANDS data profiles, unless the data are not available from the State’s submissions. This provides the State the opportunity to examine the profiles for accuracy and then decide whether it needs to correct and resubmit the data.

If the State resubmits data before the onsite review, the Children’s Bureau prepares updated data profiles on the basis of the resubmitted data. The turnaround time for doing so is generally 2–4 weeks. States, therefore, that elect to resubmit data should do so as early as possible after receiving the initial profiles.

The Children’s Bureau uses a specific SPSS data syntax to create the data profiles for the Statewide Assessment. States are encouraged to use this syntax to create and review their own data profiles before starting the Statewide Assessment. By doing so, States will have more time to examine the accuracy of their data and make corrections before receiving their official data profiles for the Statewide Assessment. If this data syntax is not normally used by the State, using the logic established by the syntax will enable the State to create its own data syntax that will be more compatible with that used for the review. The syntax (Data Profile Programming Logic) is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb. In addition, see Appendix D, Understanding State Data Profiles, which provides information designed to assist States in using the data profiles.

B.2. Preparation of Alternate Data Profiles

If a State does not submit data to NCANDS, the Children’s Bureau Regional Office and State must agree on an alternate source of statewide data to be used in preparing the safety profile. Also, for its initial review, if the State had incomplete AFCARS data, an alternate source of data approved by the Children’s Bureau could be used to generate the permanency data profiles. In the absence of NCANDS data, the Children’s Bureau Regional Office requests that the State submit its description of the proposed alternate source of data to the Children’s Bureau Regional Office 8 months before the onsite review. This provides time for the Children’s Bureau Regional Office to approve the data and transmit them to the Children’s Bureau Central Office to prepare the profiles.

The Children's Bureau Regional Office, in consultation with the Children's Bureau Central Office, approves or disapproves the alternate data source, using the following criteria:

- The data accurately represent the State's service population.
- The reporting definitions and timeframes of the alternate source are consistent with those of NCANDS.

Some of the data elements in the data profiles are used to determine the State's substantial conformity. Failure to provide data from an alternate source, in the absence of NCANDS data, could result in a determination that the State is not in substantial conformity with Safety Outcome 1.

When the Children's Bureau has approved the alternate source of data for the profiles, the State transmits the data to the Children's Bureau data team, which uses it to prepare the profiles. The State then notifies the Children's Bureau Regional Office that it has done so. The Children's Bureau Central Office prepares the profiles and sends them to the Children's Bureau Regional Office, which transmits them to the State at least 6 months before the onsite review.

If the State submits the data from the alternate source to the Children's Bureau in a timely manner, the profiles will reflect the alternate data when the Children's Bureau transmits them to the State 6 months before the onsite review. If the State is not able to submit the alternate data in a timely manner, the Children's Bureau updates the profiles to reflect the alternate data as soon as possible after receiving it.

B.3. Statewide Assessment Team Responsibilities/Analysis of the Data

The Statewide Assessment Team completes the Statewide Assessment by gathering information through a variety of sources and methods, such as focus groups with stakeholders or consumer groups, surveys, joint planning forums within the State, and other strategies that allow the State to connect the Statewide Assessment with the ongoing consultation that occurs through its Child and Family Services Plan (CFSP) process. Once the Children's Bureau Regional Office has sent the data profiles to the State, the team:

- Analyzes the data (including identifying any data quality issues)
- Meets to discuss the data and the issues behind the data
- Identifies the methods that they will use to gather additional information to complete the Statewide Assessment
- Develops responses to questions about the data, in consultation with sources outside the Statewide Assessment Team, as needed

In analyzing the data profiles, Statewide Assessment Team members:

- Review the data indicators related to the safety and permanency outcomes noted on the Statewide Assessment Instrument. The team identifies areas of strength and areas needing improvement and attempts to identify the reasons for the status of certain data indicators. Under Permanency Outcome 1, “Children have permanency and stability in their living situations,” for example, the team examines the data collected for Permanency Composite 4: Placement Stability on the percentage of children in foster care for more than 24 months who had two or fewer placement settings as one of several individual measures within this composite. If the data are available through AFCARS, the State will have 3 years of data on this individual measure and can identify whether the individual measure is moving in the desired direction. To understand the reasons behind the data, however, the State will have to look further. The team, for example, may do the following: (1) identify other data that help explain the number of placement settings these children experienced, or (2) review a sample of cases, interview caseworkers and foster families, or conduct focus groups with stakeholder representatives to identify the reasons for multiple placements.
- Compare the State’s performance on the data indicators with the national standards, where applicable. For the data indicators used to determine substantial conformity, the Statewide Assessment Team compares the State’s data with the national standards and begins to determine the reasons behind the numbers. Conducting this assessment is important because the State is required to implement a PIP that addresses data indicators on which the State does not meet the national standards.
- Use the data to identify areas of strength and areas needing improvement, both of which may need further review during the onsite review. The Statewide Assessment Team should examine the data in a manner that identifies the program areas that are most in need of further review on site. If the State identifies safety as a major concern, for example, it can work with the Children’s Bureau Regional Office to select sites, other than the State’s largest metropolitan subdivision (a required review site), where either the most typical or the most urgent safety issues exist.
- Use supplemental data, other than the AFCARS and NCANDS profiles, to examine other outcomes and systemic factors. Because the AFCARS and NCANDS profiles address only two outcomes (Safety Outcome 1 and Permanency Outcome 1), assessing other State data that address the remaining outcomes and the systemic factors increases the State’s ability to understand the factors that affect its performance.

The Statewide Assessment Team should use the Statewide Assessment process to determine the State’s effectiveness in addressing the various areas represented by the data (for example, absence of maltreatment recurrence and stability of foster care placements). Though the Statewide Assessment requires some descriptive information concerning

State policies and practices, the team should not simply describe the policies and practices that the State has in place with regard to the programs under review. Rather, the team should use the Statewide Assessment to evaluate those policies and practices and draw conclusions regarding the State's effectiveness in achieving positive outcomes for children and families. It also should examine the State's policies and practices in the context of the data. The team might, for example, look at how the effectiveness of the State's case review process affects timeliness to achieve permanency.

The Statewide Assessment also should include information on changes in performance and practice regarding each item since the previous Statewide Assessment. These might include (1) changes resulting from PIP implementation and/or other initiatives or strategies implemented by the State, (2) patterns or trends in the identified changes, and (3) statewide or local factors affecting the changes.

The State must submit the completed Statewide Assessment to the Children's Bureau Regional Office no later than 60 days before the scheduled onsite review. The State should submit a draft Statewide Assessment to the Children's Bureau Regional Office at least 1 month before that due date. The Children's Bureau Regional Office will review the draft and provide feedback to assist the State in completing a thorough and comprehensive Statewide Assessment. (All Statewide Assessments should be developed and submitted electronically rather than in hard copy.)

C. Technical Assistance With the Statewide Assessment Data

The Statewide Assessment process provides States the opportunity to build their capacity for continuous program evaluation and improvement by using data to examine program progress. To the extent possible, the Children's Bureau Central and Regional Office provide technical assistance (TA) to States that desire assistance in analyzing and interpreting the data; comparing indicators; and linking indicators with outcome measures. Federal staff, for example, might assist the Statewide Assessment Team in analyzing the Statewide Assessment through conference calls, or might link States to other sources of TA, such as the Children's Bureau-funded National Resource Centers (NRCs). (For more information on the NRCs, see the Children's Bureau Web site at www.acf.hhs.gov/programs/cb.)

D. Use of the Statewide Assessment To Structure the Review

When the Children's Bureau Regional Office receives the State's draft Statewide Assessment, the National Review Team (NRT) and Children's Bureau Regional Office Team Leaders review it and provide the State with comments designed to improve the quality of the data analysis and the evaluative component of the Statewide Assessment. The NRT and Children's Bureau Regional Office Team Leaders also check that it is complete and addresses all areas appropriately. If critical information is missing or not adequately addressed, the Children's Bureau Regional Office may ask the State to address those areas more completely. This draft review process provides the State time to make revisions to the Statewide Assessment before the final document is due to the Children's Bureau Regional Office.

Upon receiving the final Statewide Assessment, the Children’s Bureau Regional Office reviews it again for completeness and uses the information in two ways:

- In collaboration with the State, the NRT Team Leader and Children’s Bureau Regional Office make decisions about the onsite review, including the following:
 - Selecting sites (see D.1.)
 - Determining the composition and size of the sample of cases to be reviewed (see D.2.)
 - Identifying specific issues to address through stakeholder interviews (see D.3.)
- The Children’s Bureau Regional Office prepares a Preliminary Assessment (see D.4.) of the State’s performance, as reported in the Statewide Assessment.

Upon finalization of the Preliminary Assessment, and no later than 30 days before the onsite review, the Children’s Bureau Regional Office forwards an electronic copy of that document and the completed Statewide Assessment to the Children’s Bureau Central Office and the Child Welfare Review Projects for inclusion in the Review Information Package.²

D.1. Selection of Sites for the Review

The onsite review activities are conducted in three sites in the State. The State’s largest metropolitan subdivision is designated in 45 Code of Federal Regulations (CFR) §1355.33(c)(2) as a required site for the onsite review. The largest metropolitan subdivision is included as a site to ensure that the CFSRs review the country’s urban centers, where typically a disproportionate number of families have contact with child welfare systems.

In almost all situations, the largest metropolitan subdivision is the entire county in which the State’s largest city, by population, is located. There are, however, exceptional situations in some States that are considered in making this decision. The following criteria are used in determining the largest metropolitan subdivision in each State:

- Each State’s largest city, by population, will be reviewed.
- If the State’s largest city is self-contained within a single county, that entire county will be reviewed.

²The Child Welfare Review Projects support the Children’s Bureau in administering the CFSRs; the projects distribute the Review Information Packages to all Federal and State Review Team members before the onsite review.

- If the State's largest city crosses county lines, all of the child welfare offices that serve the city will be reviewed.

In some States, two or more cities may have minor differences in population, but one may have a more urban character than the other(s). In these cases, the Children's Bureau Regional Office will work with the State to jointly determine which metropolitan subdivision provides the best opportunity to review urban child welfare issues.

Only a few guidelines have been established for selecting the other two sites to provide the Children's Bureau Regional Office staff and the State maximum flexibility in ensuring that the onsite review is responsive to individual State issues and needs. These sites are selected by the Children's Bureau Regional Office Team Leader in collaboration with the Children's Bureau Central Office, the NRT Team Leader, and the State on the basis of issues raised by the Statewide Assessment. As with the selection of the largest metropolitan subdivision, each of the other two onsite review sites will almost always be single counties in the State; however, in some States, selecting single counties as review sites is not possible (for example, where State child welfare agencies are not organized by county). In either case, the following criteria are used in selecting the other two sites:

- Sites that represent a mix of population sizes and different geographic areas; for example, one small rural site and one mid-sized urban site
- Sites that represent areas with significant Native American or other populations that are representative of State demographics
- Sites that have implemented innovative practices and programs that appear to be achieving more positive outcomes than in other areas, or where the State wishes to explore the impact of specific practices and programs (such as concurrent planning)
- Sites where the Statewide Assessment identifies particular geographic areas, program areas, populations of children and families, or issues that merit further study (for example, a site where the number of terminations of parental rights has increased but where achieving timely adoptions is a challenge, or a site experiencing an increase in non-relative guardianships)

In choosing sites, the Children's Bureau Regional Office, in collaboration with the Children's Bureau Central Office, NRT Team Leader, and State, also may select locations that represent the most typical practice in the State, if there are no outstanding programmatic or systemic issues to be addressed through the onsite review. The sites selected should represent a cross-section of practice in the State. It is not necessary to select sites solely because they represent geographic areas experiencing the most difficult child welfare issues, although it is important to select sites that ensure that the review team is able to examine relevant issues and concerns within the State.

In addition, the Children's Bureau Regional Office uses the Statewide Assessment to compare prospective sites regarding the critical indicators to be examined during the onsite review. By doing so, they seek to ensure that the sites selected are representative of

the range of strengths and areas needing improvement reflected in the Statewide Assessment.

Moreover, to be selected, sites must have a large enough universe of cases to support sampling. In general, a site should have at least three times more in-home services and foster care cases than the number of cases scheduled for review in that site.

D.2. Determination of the Composition of the Sample of Cases

The Children's Bureau Regional Office and the State also use the Statewide Assessment to determine the composition of the sample of cases to be reviewed on site. The sample must include both in-home services and foster care cases. States have a target of 25 in-home cases and 40 foster care cases for review. The foster care sample is stratified into four categories. (See chapter 4, section C, for more information on case selection.)

D.3. Identification of Issues for the Onsite Review

The Children's Bureau Regional Office also may use the Statewide Assessment to identify issues regarding outcomes or systemic factors that warrant asking specific questions of stakeholders. Examples of such issues encountered during previous reviews have included State policies or practices regarding the screening of investigations of reports of child maltreatment that affected child safety, bifurcated systems of service delivery that affected agency responsiveness to the community, and contractual issues that affected service delivery. The Children's Bureau Regional Office may address issues like these that are within the scope of the CFSRs. They can do so either by asking the State to schedule specific types of stakeholders for interviews or by advising the Team and Local Site Leaders of these issues so that they are addressed during the interviews.

D.4. Preparation of the Preliminary Assessment

The Children's Bureau Regional Office prepares the Preliminary Assessment of the State's performance on each of the outcomes and systemic factors on the basis of information from the Statewide Assessment. The Children's Bureau Regional Office staff synthesize and analyze the information presented by the State. The Preliminary Assessment is not just a recording of information from the Statewide Assessment, but also a useful tool in preparing for the onsite review, the Final Report, and, ultimately, the PIP.

Developing the Preliminary Assessment provides the Children's Bureau Regional Office Team Leader an opportunity to become familiar with the practices and issues in a State. It also allows the Children's Bureau Regional Office Team Leader to identify concerns that might not have been adequately addressed in the Statewide Assessment and that therefore require further exploration during the onsite review. The Preliminary Assessment directs the focus of the review toward underlying issues, which will be critical to helping the State develop a PIP. (Determinations of substantial conformity, however, are based on information from the Statewide Assessment and the onsite review.)

The Preliminary Assessment is designed to:

- Provide review team members with basic information about the State and the Statewide Assessment as they begin the onsite review.
- Provide review team members with an analysis of the key issues, and raise questions to be examined during the onsite review.
- Permit quick identification of areas in which there may be discrepancies between information in the Statewide Assessment and information that will be obtained on site so that the discrepancy resolution process can begin immediately following the onsite review. (See chapter 5, section C, for information on resolving discrepancies.)
- Identify the State's performance level with regard to the data indicators and the national standards.
- Provide the State with an analysis of the information contained in the Statewide Assessment, which they can use to begin thinking about the PIP.
- Provide information to be used in preparing the Final Report to the State regarding substantial conformity (see chapter 6 for information on the preparation and distribution of the Final Report).

In completing the Preliminary Assessment, the Children's Bureau Regional Office:

- Records pertinent data and narrative information from the Statewide Assessment on the Summary of Findings Form, describing each outcome and systemic factor.
- Provides an analysis of the information, highlighting areas that may require further exploration during the onsite review. This includes developing questions that Team Leaders can use during stakeholder interviews. This analysis can help reviewers focus on areas in which further information is needed to draw conclusions about the effectiveness of policy and practice in achieving positive outcomes for children and families.
- Compares the data indicators used to make determinations about substantial conformity with the national standards and records that information on the Summary of Findings Form.

The Children's Bureau Regional Office provides the Preliminary Assessment to the State and to the Child Welfare Review Projects no later than 30 days before the onsite review. The Child Welfare Review Projects then include the Preliminary Assessment, along with the Statewide Assessment and other State-specific material, in the Review Information Package (see Appendix F, Review Information Package, which provides a list of information to be sent to the review team members) that is sent to the Federal and State Review Team members.

D.5. Example of a Preliminary Assessment

The example that follows is one page from the Summary of Findings Form that illustrates how information from the Statewide Assessment is used to prepare the Preliminary Assessment. This information is updated and supplemented during and after the onsite review and is used in developing the Final Report.

| Example of a Preliminary Assessment | | | | | |
|--|--------------------------|--------------------|-----------------------|-------------------------------|-------------------------|
| II. PERMANENCY | | | | | |
| Permanency Outcome 1: Children have permanency and stability in their living situations. | | | | | |
| Number of cases reviewed by the team according to degree of outcome achievement: | | | | | |
| | Site Name 1 | Site Name 2 | Site Name 3 | Total Number | Total Percentage |
| Substantially Achieved: | | | | | |
| Partially Achieved: | | | | | |
| Not Achieved or Addressed: | | | | | |
| Not Applicable: | | | | | |
| Conformity of data indicators with national standards: | | | | | |
| | National Standard | State Score | Meets Standard | Does Not Meet Standard | |
| Timeliness and permanency of reunifications | 110.2 or higher | 96.1 | | X | |
| Timeliness of adoptions | 103.0 or higher | 106.7 | X | | |
| Achieving permanency for children in foster care | 111.7 or higher | 105.8 | | X | |
| Placement stability | 108.5 or higher | 102.0 | | X | |
| Item 5. Foster Care Re-entries | | | | | |
| <input type="checkbox"/> Strength <input type="checkbox"/> Area Needing Improvement | | | | | |
| Preliminary Assessment: | | | | | |
| <ul style="list-style-type: none"> ● The data permanency composites indicate that the State does not meet the standard for reunification. ● The Statewide Assessment indicates that length of stay in foster care has decreased substantially, which is excellent. However, State performance on the overall reunification composite is being held back by the large increase in foster care re-entries. The State indicates that most re-entries are by children discharged to reunification as opposed to other discharge reasons. ● The Statewide Assessment indicates that State policy does not require the agency to provide post-reunification services beyond 3 months. The State has provided data that show that most cases are closed within 60 days of reunification. The Statewide Assessment also indicates that a strong array of post-reunification services is not available; funding is scarce and is mostly targeted to the urban areas of the State, while families residing in rural areas have fewer service options. Improvement of post-reunification services is likely to result in improved performance on the individual re-entry measure as well as the overall reunification composite. ● Questions for the onsite review: (1) If there are cases reviewed in which children have re-entered care, do they generally re-enter within 60 days of reunification, or after 60 days? (2) At the time children re-enter care, are services being provided, or have they been provided, to support reunification? (3) What services are available at each site to support reunification? How effective do stakeholders believe these services are in supporting reunification? (4) How accessible are the services? How long are services available? (5) In what ways are the services culturally responsive to the needs of the families? | | | | | |

The Children’s Bureau Regional Office also records other relevant information from the Statewide Assessment on the Preliminary Assessment for outcomes and systemic factors reviewed for which there are no data. For example, under “Child and family involvement in case planning” (item 18 on the Summary of Findings Form), the Children’s Bureau Regional Office summarizes information from section III (Narrative Assessment of Child and Family Outcomes), subsection C (Child and Family Well-Being), of the Statewide Assessment. Under each of the systemic factors, the Children’s Bureau Regional Office records relevant information addressing each factor from sections III (Narrative Assessment of Child and Family Outcomes) and IV (Systemic Factors) of the Statewide Assessment.

E. Interim Statewide Assessments Between Full Reviews

States determined to be in substantial conformity with all seven outcomes and seven systemic factors are reviewed every 5 years and are required to complete an interim Statewide Assessment between the full reviews. There is no similar requirement for States determined not to be in substantial conformity because those States are reviewed at 2-year intervals.

States in substantial conformity must submit to the Children’s Bureau Regional Office a completed interim Statewide Assessment 3 years from the date of the previous onsite review, meaning that the work on the interim Statewide Assessment begins approximately 6 months before that deadline. The process for completing the interim Statewide Assessment is the same as that used for a full review, including the participation of representatives external to the State agency.

The Children’s Bureau initiates the interim Statewide Assessment process by preparing the data profiles and transmitting them to the Children’s Bureau Regional Office, which sends them to the State. Once the State completes and submits the interim Statewide Assessment, the Children’s Bureau Central and Regional Offices review it for indications of the State’s status on the outcomes and systemic factors subject to review. (The Children’s Bureau Regional Office does not need to approve the interim Statewide Assessment. If it is incomplete, however, the Children’s Bureau Regional Office will ask the State to provide additional information.)

In particular, the Children’s Bureau Regional Office reviews the interim Statewide Assessment to determine whether the State is maintaining the level of achievement on the data indicators required to comply with the national standards. If the State drops below the national standards for the data indicators, or otherwise appears out of substantial conformity, the Children’s Bureau Regional Office first requests that the State submit additional information. If the additional information also indicates nonconformity, the Children’s Bureau Regional Office, in consultation with the Children’s Bureau Central Office, may initiate either a partial review (which targets specific areas) or a full review, as appropriate, to make the determination of substantial conformity. The Children’s Bureau Regional Office follows the procedures at 45 CFR §1355.32(c) for reinstating reviews, on the basis of the State not being in substantial conformity.

F. Subsequent Reviews

In accordance with 45 CFR §1355.32(b), the subsequent reviews following the initial review (at 5 years for States determined to be in conformity and 2 years for States determined not to be in conformity) are full reviews. A partial review may be conducted between full reviews if the Children’s Bureau Central or Regional Office becomes aware that a State previously found to be in conformity in one or more area(s) now appears to be out of conformity in one or more of those areas.

The Children’s Bureau Regional Office coordinates with the Children’s Bureau Central Office and the State to select a date for the subsequent review. The Children’s Bureau Central Office sends the data profiles to the Children’s Bureau Regional Office for transmission to the State 6 months before the subsequent review.

For subsequent reviews, a State can use the prior Statewide Assessment, Final Report, and PIP progress reports to begin evaluating their progress. The State should focus on:

- Analyzing current data and re-examining program effectiveness on the basis of new data
- Identifying where improvements have been made and where ongoing issues exist
- Noting current strengths and areas needing improvement that require attention during the subsequent CFSR

The State should incorporate this information into their CFSP process, as they do with the PIP and the CFSR process. States also should engage external partners in the PIP, the subsequent Statewide Assessment, and the subsequent CFSR. This can be accomplished through ongoing committees, work groups, focus groups, surveys, and other activities that focus on the PIP and/or the subsequent Statewide Assessment. (The State needs to build in sufficient time for these activities in completing the subsequent Statewide Assessment.)

As in the initial review, the results of the subsequent Statewide Assessment are used to inform key decisions regarding the onsite review, including site selection and sample composition.

Chapter 4

Onsite Review

The onsite review is the second phase of the Child and Family Services Reviews (CFSRs) and primarily is designed to gather qualitative information. The onsite review lasts 1 week and includes the examination of a sample of cases for outcome achievement and interviews with State and local stakeholders to evaluate the outcomes and systemic factors under review. (See chapter 1, section D, for information on the outcomes and systemic factors.) The review takes place in three sites in the State. The State's largest metropolitan subdivision is a required site, and the other two sites are determined on the basis of information in the Statewide Assessment. (See chapter 3 for information on the Statewide Assessment.)

This chapter provides information about the responsibilities of the Children's Bureau Central and Regional Offices, State, and Child Welfare Review Projects in preparing for and conducting the onsite review. (See chapter 2 for information on the roles and responsibilities of specific review team members.) It also provides an overview of the review instruments and the key steps in planning and conducting the onsite review, including case selection and review, interviews with State and local stakeholders, and team debriefings.

A. Onsite Review Activities

During the onsite review, the Onsite Review Team examines case records, conducts case-related and stakeholder interviews, and participates in (or leads) team debriefings, local exit conferences, a full team debriefing, and the statewide exit conference. (See chapter 2, section C, for information on the structure and functions of the Onsite Review Team and Appendix E, CFSR Tips on Creating Onsite Review Schedules. In addition, see section F below for information on the debriefings and exit conferences.) The goal of the case record reviews and case-related and stakeholder interviews is to obtain qualitative information that complements the quantitative information (data indicators, such as data on foster care re-entries and the absence of maltreatment recurrence) reported through the Statewide Assessment.

The onsite review also permits the team to collect information on items/outcomes that is not reported in aggregate form through data collection, such as risk assessment and safety management and the nature of the relationship between children in care and their parents. The combination of the data, reported through the Statewide Assessment, and the information on child and family outcomes and statewide systemic factors, gathered

through the onsite review, allows the review team to evaluate programs' outcome achievement and identify areas in which the State may need technical assistance (TA) to make improvements.

The Children's Bureau developed the following standardized instruments for collecting and recording information during the onsite review:

- **Onsite Review Instrument and Instructions:** This Instrument is used by review team members who conduct case record reviews. It contains questions to guide the case record review process and provides space for rating the 23 items and 7 outcomes under review and for documenting information to support those ratings.
- **Stakeholder Interview Guide:** This guide provides a framework for the Team Leaders and Local Site Leaders who conduct interviews with stakeholders regarding the outcomes and systemic factors under review. The guide lists the individuals whom the Team Leaders must interview and provides core and follow-up questions for each of the 23 items under the 7 outcomes and 22 items under the 7 systemic factors.
- **Preliminary Assessment and Summary of Findings Form:** This form is used by the Children's Bureau Regional Office to: (1) prepare an analysis (known as the Preliminary Assessment) of the State's performance on the outcomes and systemic factors, on the basis of information from the Statewide Assessment, (2) record the preliminary findings of the onsite review, and (3) prepare the Final Report of the review.

Training on how to use the Onsite Review Instrument and Instructions is provided to review team members before the onsite review. The review instruments are available on the Children's Bureau Web site at www.acf.hhs.gov/programs/cb.

B. Preparation for the Onsite Review

Preparation for the onsite review includes selecting cases to be reviewed, preparing case records for review, scheduling case-related interviews and State and local stakeholder interviews, preparing reviewer schedules, planning logistical arrangements, providing training, and distributing review-related materials to the review team. These activities are carried out by the Children's Bureau Central and Regional Offices, Child Welfare Review Projects, State central and local child welfare agencies, and Local Site Coordinators. The responsibilities of each are listed below.

B.1. Children’s Bureau Central Office Responsibilities

The Children’s Bureau Central Office does the following in planning for the review:

- Identifies the National Review Team (NRT) Team Leader and NRT Local Site Leaders for the review, and Children’s Bureau staff to serve as reviewers.
- Develops the safety and permanency profiles, and transmits them through the Children’s Bureau Regional Office to the State.
- Participates in a series of review planning conference calls with the Children’s Bureau Regional Office and State child welfare agency staff; the calls are scheduled and facilitated by the Child Welfare Review Projects.
- Arranges for training of NRT members and Children’s Bureau and Children’s Bureau Regional Office staff who will participate in a review.
- Reviews and provides feedback on the Statewide Assessment, State policies, and Preliminary Assessment to the Children’s Bureau Regional Office.
- Consults with the Children’s Bureau Regional Office and State on the size and composition of the sample of cases to be reviewed, locations of review sites, selection of consultant reviewers, and other issues needing particular attention during the onsite review.
- Draws random samples of cases to be reviewed on site from the Adoption and Foster Care Analysis and Reporting System (AFCARS) data (foster care cases) and from the list of in-home services cases provided by the State, and transmits the samples through the Children’s Bureau Regional Office to the State.
- Provides a sorted AFCARS table by the four foster care categories and by jurisdiction within a State to ensure that sites selected for the onsite review will have a sufficient number of the targeted foster care cases for review.

B.2. Children’s Bureau Regional Office Responsibilities

The Children’s Bureau Regional Office assigns a Children’s Bureau Regional Office Team Leader to work in collaboration with the NRT Team Leader to guide the review. The Children’s Bureau Regional Office Team Leader:

- In consultation with the Children’s Bureau Central Office, assigns Children’s Bureau Regional Office staff to serve on the review team, including as Federal Local Site Leaders as needed.
- Participates in a series of review planning conference calls with the Children’s Bureau Central Office and State child welfare agency staff; the calls are scheduled and facilitated by the Child Welfare Review Projects.

- Collaborates with the Children’s Bureau Central Office and the State to identify State-specific systemic issues from the Statewide Assessment that require further review on site, select the locations of the review sites, and determine the composition of the sample of cases to be reviewed. (See section C below and chapter 3, section D.2., for information on determining the sample composition.)
- Reviews and concurs with the criteria and methods that the State will use to determine which cases in the State meet the definition of in-home services cases, for inclusion in the universe of in-home services cases, and to identify and compile a list of all cases that meet the definition. (See section C.3.1. below for information on the in-home services sample.)
- Requests from the State a list of in-home services cases (the universe of cases of this type) meeting the sampling criteria for in-home services cases during the period under review, from which the Children’s Bureau Central Office draws the sample of in-home services cases. The Children’s Bureau Regional Office Team Leader also arranges for the State to transmit the list to the Children’s Bureau Central Office for sample selection. Once the Children’s Bureau Central Office has drawn the random samples of in-home services and foster care cases, the Children’s Bureau Regional Office Team Leader sends these to the State.
- Requests that the State provide a summary of State policies relevant to the review on the State Policy Submission Form (available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb).
- Consults with the NRT and State Team Leaders about the Onsite Review Team composition to determine the number of reviewers needed and to identify and address potential conflicts of interest.
- Notifies the Child Welfare Review Projects, 3 months before the onsite review, of the number of consultant reviewers needed for the review and, in consultation with the Children’s Bureau Central Office, selects consultants for the review.
- Collaborates with the State Team Leader to develop the Federal-State Review Team pairings and site assignments (case record reviews are conducted by pairs of reviewers, comprising one Federal Review Team member and one State Review Team member).
- At least 30 days before the onsite review, provides the Child Welfare Review Projects with the Statewide Assessment (typically provided 60 days before the onsite review), Preliminary Assessment, State Policy Submission Form, and review team pairings.
- Collaborates with the State to ensure that all required State and local stakeholders are scheduled for interviews during the onsite review, and requests that the State Team Leader submit stakeholder interview schedules to the Children’s Bureau Regional Office at least 2 weeks before the onsite review. The Children’s Bureau

Regional Office then distributes these to the NRT Team Leader, NRT Local Site Leaders, and Child Welfare Review Projects.

- Requests that the State Team Leader submit review team schedules (including case record reviews and case-related interviews) to the Children’s Bureau Regional Office at least 1 week before the onsite review. The Children’s Bureau Regional Office then distributes these to the NRT Team Leader, NRT Local Site Leaders, and Child Welfare Review Projects.
- Before the onsite review, prepares to discuss with the NRT Team Leader and Local Site Leaders specific State issues or policies identified through review of the Statewide Assessment and State Policy Submission Form, and preparation of the Preliminary Assessment.
- Coordinates with the Child Welfare Review Projects to plan for the training of State Review Team members, which takes place approximately 2 weeks before the onsite review, and participates in the training, if possible.
- Collaborates with the NRT Team Leader and State Team Leader to develop the agenda for the entrance and local and statewide exit conferences (see section F below for information on exit conferences).

B.3. Responsibilities of the Child Welfare Review Projects

The Child Welfare Review Projects do the following in support of the Children’s Bureau in planning for the review:

- Recruit individuals with experience in the child welfare field to be part of a national pool of consultants. Once trained, consultants are eligible for selection by the Children’s Bureau Regional Office to serve as Federal members of the Onsite Review Teams.
- Design and conduct trainings for consultants on their roles in the onsite reviews (reviewers and Local Site Leaders).
- Design and conduct trainings for cross-State participants (CSPs).
- Schedule and facilitate a series of review planning conference calls, beginning 9 months before the onsite review, with the Children’s Bureau Central and Regional Offices and State child welfare agency staff.
- Approximately 3 months before the onsite review, provide the Children’s Bureau Regional Office with the names and profiles of consultants who have indicated an availability to participate in the onsite review and who, if they have participated in a review, have met the Children’s Bureau criteria for participation in future reviews. The Children’s Bureau Regional Office selects consultants from that list to supplement the Federal Review Team.

- Obtain the site assignments from the Children’s Bureau Regional Office, and makes logistical arrangements for the consultants, such as transportation and lodging. The projects also make lodging arrangements for other Federal Review Team members and coordinate these arrangements with State staff to ensure that the Federal and State Onsite Review Team members are housed in the same location.
- Coordinate with the Children’s Bureau Regional Office and State Team Leaders to identify a location for the statewide full team debriefing and exit conference, arrange for meeting space and equipment, and provide staff to manage the logistical arrangements associated with both.
- Coordinate onsite transportation arrangements with the Children’s Bureau Regional Office and State Team Leaders, and can arrange for rental cars for up to eight consultants who serve as Federal Review Team members.
- Produce and distribute Review Information Packages to review team members approximately 2 weeks before the onsite review (upon receipt of review-related information from the Children’s Bureau Regional Office and the State). (See Appendix F, Review Information Package Contents, which provides a list of information to be sent to review team members.)
- Produce copies of the review instruments and any other information that review team members need during the review week and send these to the attention of the NRT Team Leader and NRT Local Site Leader to arrive at the local sites the week before the onsite review.
- Provide tablet personal computers containing the CFSR Data Management System to the NRT Local Site Leaders and provide technical support during the onsite reviews (see section F below for more information on uses of the system).
- Assist the Children’s Bureau Central and Regional Offices in tracking the status of the reviews.
- Provide analytic support to the Children’s Bureau regarding the reviews.
- Design and conduct training of the State Review Team members; the trainings are held in each State approximately 2 weeks before the onsite review.

B.4. State Agency Responsibilities (Central Office)

The State agency does the following in planning for the review:

- Assigns a senior State staff person to serve as the State Team Leader to provide oversight to the State Onsite Review Team members and to liaise with the Children’s Bureau Regional Office and the Child Welfare Review Projects in making arrangements for the review.
- Participates in a series of review planning conference calls with the Children’s Bureau Central and Regional Office staff; the calls are scheduled and facilitated by the Child Welfare Review Projects.
- Identifies State Review Team members, ensuring that the team includes some members who are staff of the State’s public child welfare agency and some external partners, and provides information about the State members to the Children’s Bureau Regional Office. (To avoid conflicts of interest, State team members should not be assigned as Local Site Leaders or reviewers in the same site in which they work or have oversight responsibilities.)
- Identifies the review sites, including the State’s largest metropolitan subdivision, in consultation with the NRT and Children’s Bureau Regional Office Team Leaders and on the basis of information from the Statewide Assessment. The Children’s Bureau must concur with the sites selected for the onsite review.
- Assigns Local Site Coordinators in each of the review sites. Local Site Coordinators are responsible for setting up interviews, making local arrangements, and ensuring that case records to be reviewed are available. The Local Site Coordinator should be an administrator from the site under review, or their designee. To avoid conflicts of interest, the Local Site Coordinator does not participate in team activities, such as debriefings or stakeholder and case-related interviews, but should be available to the team during regular working hours to handle unexpected issues that may arise, such as the need to reschedule interviews.
- Consults with the Child Welfare Review Projects, Children’s Bureau Regional Office Team Leader, and Local Site Coordinators regarding logistical arrangements for the review, including:
 - Lodging arrangements for Onsite Review Team members
 - Locations and times for the debriefings and entrance and exit conferences
 - Space for other scheduled meetings and review activities during the week
 - Transportation for Onsite Review Team members (The Child Welfare Review Projects can arrange for rental cars for up to eight consultants who serve as Federal Review Team members; Federal staff usually can rent cars.)

- Ensures that all State Local Site Leaders and Local Site Coordinators have a copy of the *CFSR Procedures Manual* and instruments and are well oriented to the review process, and that all review team members are informed that the manual and instruments are available on the Children’s Bureau Web site.
- Collaborates with the Children’s Bureau Regional Office to determine which cases in the State meet the definition of in-home services cases for inclusion in the universe of in-home services cases, and specifies the methods for identifying and compiling a list of cases that meet the definition. (See section C.3.1. below for information on the in-home services sample.)
- Prepares a list of cases from which the sample of in-home services cases will be drawn (universe), and submits this to the Children’s Bureau Regional Office 60–90 days before the onsite review or as soon as the composition of the onsite sample has been determined.
- Transmits the total sample list of in-home services and foster care cases selected by the Children’s Bureau to the Local Site Coordinators 45–60 days before the onsite review. The local agencies managing the onsite review examine the sample lists; identify the cases for which interviews will be scheduled, using the criteria provided in section C below; contact the individuals involved in the cases; and schedule interviews.
- Collaborates with the Children’s Bureau Regional Office to determine the number and composition of State and local stakeholder interviews to be conducted during the onsite review.
- Makes appointments for Team Leaders to conduct interviews with State-level stakeholders.
- Submits a stakeholder interview schedule to the Children’s Bureau Regional Office at least 2 weeks before the onsite review.
- Submits review team schedules (case record reviews and case-related interviews) to the Children’s Bureau Regional Office at least 1 week before the onsite review.
- Collaborates with the Children’s Bureau Regional Office to match Federal and State members of the Onsite Review Team in pairs, and assigns each pair to a review site, at least 6 weeks before the onsite review.
- Coordinates with the Child Welfare Review Projects regarding providing training for the State members of the Onsite Review Team.
- Schedules a meeting at the end of the review week for the Children’s Bureau Central and Regional Offices to conduct the statewide debriefing, compile the Summary of Findings Form for the State, and prepare for the statewide exit conference.

- Coordinates with the Child Welfare Review Projects to host the statewide exit conference, recommends meeting space, and invites participants to the statewide debriefing and the statewide exit conference. At the statewide exit conference, the NRT Team Leader provides State staff and review team leaders with an overview of the preliminary review findings, discusses next steps, and raises and clarifies review-related issues. (See section F below for information on the statewide exit conference.)

B.5. Local Site Coordinator Responsibilities

Each Local Site Coordinator does the following for the review site to which they are assigned:

- Selects the cases to be reviewed from the random sample drawn for the review, using the criteria discussed below in section C.
- Orients local child welfare agency staff to the purposes of the review and the review activities.
- Schedules review week activities, including the following (see Appendix E, Tips on Creating Onsite Review Schedules):
 - An informal entrance conference on Monday morning with local officials and Federal and State members of the Onsite Review Team. The informal entrance conference should focus on logistics and last not more than 30 minutes. Local agency leaders who wish to provide information to review team members about the review site may submit it in writing to the Children’s Bureau Regional Office at least 5 weeks before the onsite review.
 - Interviews with caseworkers and/or supervisors whose cases are selected for review and with other professionals knowledgeable about the cases. The Local Site Coordinator also confirms the interviews and orients those individuals to the purposes of the review. It is preferable to interview parents, children, and caregivers in their homes and/or the placement setting and to interview caseworkers and service providers at the agency or another convenient location.
 - Local stakeholder interviews (at stakeholders’ offices or other suitable locations, depending on the number of stakeholders involved), focus groups, and other meetings that will be part of the review. The Local Site Coordinator also confirms the interviews and orients these interview participants to the purposes of the review.
 - Additional case-related and local stakeholder interviews as Local Site Leaders deem necessary during the onsite review. The Local Site Coordinator also confirms these interviews.

- A daily team debriefing, usually held in the early evening on Monday, Tuesday, and Wednesday of the review week (see Appendix E, Tips on Creating Onsite Review Schedules).
- An informal local exit conference with local officials and local team members. The Local Site Coordinator should work with the NRT Local Site Leader before the review to schedule the local exit conference at a time that will allow the review team to complete its activities. Generally, the local exit conference takes place late Thursday afternoon of the review week.
- Submits to the State Team Leader the schedule of stakeholder interviews so that the State Team Leader can submit these to the Children’s Bureau Regional Office at least 2 weeks before the onsite review.
- Prepares and submits to the State Team Leader a schedule for each review team pair that includes time to review cases; the name, time, date, and location of each scheduled interview or meeting; and time for the local entrance and exit conferences and debriefings.
- Prepares maps and other written directions for review team members to assist them in getting to the site office and scheduled appointments, and plans transportation for them to interviews. (The Child Welfare Review Projects can arrange for rental cars for up to eight consultants who serve as Federal Onsite Review Team members; Federal staff usually can rent cars.)
- Arranges for space for the Onsite Review Team’s case record reviews, interviews, debriefings, local exit conferences, and other planned meetings, ensuring that review team members have access to the site office during non-business hours and that interview schedules do not conflict with debriefing times, to the extent possible.
- Ensures that the technical requirements of the CFSR Data Management System are met, including making Internet connections and power sources available.
- Assembles all case records to be reviewed so that they are ready and accessible at the start of the review week. The Local Site Coordinator also arranges a secure site for overnight case record storage.
- Secures any releases of information or confidentiality forms needed to permit reviewers to access case records and interview individuals associated with the cases.

Receives and secures shipment of tablet computers before the onsite review and releases them to the Local Site Leader at the start of the review week.

See chapter 2, section C.2.4., for additional information about the responsibilities of the Local Site Coordinator.

C. Case Selection and Review

C.1. Preparation for the Case Sampling Process

Before selecting the in-home services and foster care samples, the Children's Bureau Central and Regional Offices and State staff should make the decisions and arrangements described below. These usually are discussed during the review planning conference calls at least 60-90 days before the onsite review.

- Confirm the three counties (or other geographical areas) where the onsite review will be conducted. These review sites are selected on the basis of reviewing a draft Statewide Assessment. Quantitative and qualitative data that provide sufficient information about counties or other geographic areas should be used to guide the selection of review sites that will facilitate a representative examination of the State child welfare system. Children's Bureau Regional Office and State staff should ensure that in each review site selected for the onsite review, there are at least three times more in-home services and foster care cases than the number of cases scheduled for review in that site. (For foster care cases, each site should have at least three times more cases in each of the four categories than the number of cases in each category scheduled for review in that site; see section C.3.2. below.) A list of all State counties or jurisdictions based on the Federal Information Processing Standards (FIPS) or county code will be generated by the Children's Bureau Data Team to assist in the site confirmation process. If an insufficient number of in-home services or foster care cases is available, another site needs to be selected or the issue should be resolved through conference calls with the Children's Bureau Central and Regional Offices and State.
- Determine whether the State's in-home services cases are categorized by child or by family, and discuss converting cases to family, if necessary. (See section C.3.1. below.)
- Confirm that any sealed foster care or adoption records will be available if they are selected for the sample. Federal authority exists to audit such cases (§471[a][8][D] of the Social Security Act). The Children's Bureau Regional Office and State should develop a plan to access sealed records and locate and invite participation by adoptive families.

C.2. Number of Cases To Be Reviewed

During the second round of reviews, the Children's Bureau will increase the minimum number of foster care cases reviewed on site in the areas of recent entry, adoption, and older youth in foster care. A total of 65 cases will be reviewed per State, unless unusual circumstances exist and specific arrangements are made between the Children's Bureau and the State to review fewer cases. The breakout of cases in the review sample follows:

- **Review 25 in-home cases per State.** The CFSR will include 25 in-home cases, which will reflect the State’s in-home services population as defined in the State CFSP. (See Section C.3.1.)
- **Review 40 foster care cases.** The foster care cases will be stratified into four categories to achieve an adequate representation of cases in key program areas. (See section C.3.2.)
- **Review no more than 40 foster care cases, even if the number of in-home cases does not reach 25.** In situations in which the number of in-home services cases cannot be reached and adjustments across sites are necessary, the Children’s Bureau will seek to review a minimum of 5 in-home services and 10 foster care cases in each of the two non-metropolitan sites and a minimum of 10 in-home services cases in the metropolitan site. In addition, when the foster care cases from all three sites are combined, there should be 10 cases total in each of the four categories.

C.3. General Case Sampling Guidelines for In-Home Services and Foster Care Cases

After the review sites have been determined, the Children’s Bureau draws two random samples of cases to be reviewed (a total of 150 in-home services cases and approximately 150 foster care cases) from the respective universe of cases in the three sites to be reviewed. The sample of in-home services cases is selected by family, and the sample of foster care cases is selected by child. Before the Children’s Bureau sends the sample of 150 foster care cases to the State, it randomizes the records in the sample. That step is designed to preclude any bias when the State selects the cases to be reviewed at each of the three sites. In selecting the cases to be reviewed, the State should follow the sequential order in which the cases appear in the two re-randomized samples.

Local Site Coordinators then schedule the 65 cases for onsite reviews across the three sites. At each review site, approximately 15-35 cases are reviewed (for example, the Onsite Review Team typically reviews up to 35 cases in the largest metropolitan subdivision and no fewer than 15 in the other two sites), unless otherwise agreed upon by the Children’s Bureau and the State. The Children’s Bureau, however, will review no fewer than 15 cases at any review site. The procedures described below provide guidance regarding the two types of samples:

- For in-home services cases, the universe is a State-provided list of in-home services cases that were open for services for at least 60 consecutive days during the sampling period and in which no children in the family were in foster care for 24 hours or longer during any portion of the review period. The State should provide this list of in-home services cases to the Children’s Bureau because that information is not currently available through the National Child Abuse and Neglect Data System (NCANDS) or other national data sources. The sampling period for in-home services cases extends 2 months beyond the sampling period for foster care cases, for a total of 8 months. (The in-home services case sampling

period is longer because the CFSRs review in-home services cases that were open for at least 60 days.)

- For foster care cases, the universe is the State’s 6-month AFCARS submissions that correspond with the sampling period for the three review sites. To ensure that sites selected for the onsite review will have a sufficient number of the targeted foster care cases for review, the Children’s Bureau will sort the AFCARS foster care file by the four categories and by jurisdiction within a State. A table will be generated for each State identifying the jurisdictions and the number of cases in each of the four categories. This will assist in the site selection process after sites are proposed through the Statewide Assessment. (See section C.3.2. below for a description of the four categories.)

C.3.1. In-Home Services Samples

The in-home services samples are family-based and are selected from a universe (list) of cases provided by the State. The Children’s Bureau Regional Office will request that the State provide the universe of in-home services cases for the three selected review sites to the Children’s Bureau Regional Office no later than 60–90 days before the onsite review. The State should provide the universe as soon as possible after the review sites are selected.

The universe of in-home services cases should include the State’s non-foster care cases for which the State’s title IV-E/IV-B agency is responsible as defined in State policy, or the families served pursuant to the State’s Child and Family Services Plan (CFSP). Juvenile justice cases, mental health cases, and other in-home services cases, even if they are not funded with Federal funds, are to be included in the State’s in-home services universe if the services the State IV-E/IV-B agency provides to them, either directly or through contractual arrangements, are provided pursuant to the State’s CFSP. This would include, for example, the requirement that a State have a pre-placement preventive services program to help children at risk of foster care placement remain safely with their families.

In determining whether an in-home services case should be included in the universe, the State should consider the following criteria:

- Whether the State or local title IV-E/IV-E funded child welfare agency has or had ongoing responsibility for the case, as defined in State policy, or the families are served pursuant to the State’s CFSP; or
- Whether the case was open for at least 60 consecutive days during the sampling period, and did not have any children in the family in foster care for 24 hours or longer during any portion of the review period.

For in-home services cases in which a State child welfare agency contracts out the responsibility for providing services, the following case should be included in the sample: a case in which the State’s title IV-E/IV-B child welfare agency made the referral for

services, paid for the services through Federal or State funds, and monitored the service provision by the contractor, and the family is served pursuant to the State's CFSP.

The Children's Bureau Regional Office staff should determine whether the State's in-home services cases are listed by family or by child. If a State lists its in-home services cases by child instead of by family, the Children's Bureau Regional Office will request that the State provide its list of in-home services cases with the children from each family grouped together. The ease of grouping these cases will depend on whether children from the same family have the same case number or another designation that identifies them as being from the same family.

At a minimum, the State should include the following data elements on the list of in-home services cases that it provides:

- The FIPS code: To verify that the county is correct.
- The case number: To verify that the sampled cases correspond to the ones to be reviewed during the onsite review.
- The caseworker identification code: To ensure that a particular caseworker is not over-represented in the sample.

The Children's Bureau may request optional data elements from the State, such as elements related to requests for stratification of samples (supervisor identification codes, case type codes for juvenile justice cases, and similar codes). The State should provide this information to the Children's Bureau data team before the sample is drawn.

The State should send the list of the universe of in-home services cases electronically to the Children's Bureau Central Office and notify the Children's Bureau Regional Office when the list is transmitted. The file can be transmitted as an ASCII file (a standard type of file that can be read by any computer) or Microsoft Excel spreadsheet.

Upon receiving the list, the Children's Bureau data team selects a total of 150 in-home services cases from the three review sites, on the basis of the proportion of cases to be reviewed at each site. If 10 of the 25 in-home services cases (40 percent) scheduled to be reviewed are in county A, for example, the Children's Bureau data team selects a sample of 60 (0.4×150) in-home services cases from county A's list. If this is not possible, the Children's Bureau data team attempts to preserve the proportionality of the cases scheduled for review at each site to the extent possible. The Children's Bureau then re-randomizes the cases in each sample before transmitting these to the State.

After the State receives the three re-randomized samples, it verifies and finalizes the list of cases to be reviewed, following the guidance provided in section C.3. below regarding eliminating cases. The State schedules cases sequentially from the lists, maintaining the exact order used in the sample provided by the Children's Bureau and eliminating any ineligible cases after consultation with the Children's Bureau Regional Office.

If 25 in-home services cases cannot be scheduled on site, no substitution of foster care cases will be undertaken. At least two alternate in-home services cases should be available from the lists at each site in the event that in-home services cases are eliminated during the onsite review. If the target number of in-home services cases cannot be reached or adjustments across sites are necessary, the Children's Bureau Regional Office will seek to review a minimum of five in-home services cases for the two non-metropolitan sites.

C.3.2. Foster Care Samples

The State's universe of foster care cases is the State's AFCARS submission that corresponds with the sampling period for the three review sites. The universe of cases should comprise children for whom the agency has placement and care responsibility and who are considered to be in foster care on the basis of AFCARS reporting requirements. If juvenile justice or mental health cases are reported to AFCARS consistent with AFCARS requirements, they are part of the universe of cases.

In some States, regions or districts instead of counties are used as review sites. Such States should provide an abridged AFCARS file containing the FIPS codes demarcating the geographic areas selected for the onsite review. The remainder of the abridged AFCARS file should contain the encrypted case numbers and the dates of birth broken out into three columns: one for year, one for month, and one for day. The FIPS code is needed to separate the file into regions or districts. The case number is needed to verify that the sampled cases correspond to the cases being reviewed during the onsite review, once these numbers are decrypted. The crosswalk between the encrypted case numbers and the actual case numbers is needed so that Federal staff can make this determination.

The abridged AFCARS file of foster care cases should be sent electronically to the Children's Bureau, and the State should notify the Children's Bureau Regional Office of the transmission. The file can be transmitted as an ASCII file or as a Microsoft Excel spreadsheet.

The Children's Bureau may request optional data elements from the State, such as elements related to requests for stratification of samples (supervisor identification codes, case type codes for juvenile justice cases, or similar codes). The State should provide this information to the Children's Bureau data team before the sample is drawn.

From the AFCARS file or abridged AFCARS file, the Children's Bureau data team selects approximately 150 foster care cases on the basis of the proportion of cases to be reviewed at each site, using the process described in section C.2.1. For the second round of reviews, foster care cases will be stratified into four categories to achieve an adequate representation of cases in key program areas. The cases will be stratified as presented in the chart below:

| Stratification of Case Samples | | |
|---------------------------------------|---|---|
| Category of Cases | Number and Description of Cases To Be Reviewed | Rationale for Reviewing Cases of This Type |
| Foster Care Category 1 | 10 cases involving children who were ages 16 or 17 as of the last day of the period under review (PUR) or the date that they exited care, as applicable. These children could have any permanency goal and could have entered care either before or during the PUR. | Categories 1–3 may include children entering foster care during the PUR, which will ensure a proportion of this case type that is consistent with the regulation and that will address the need to focus on State practice after the first-round of Program Improvement Plan (PIP) implementation. The case numbers for these categories were based on the need to focus on (1) State practice during the PUR, (2) the emphasis on re-entries, and (3) the focus in the second round of reviews on the population of older youth in care. |
| Foster Care Category 2 | 10 cases involving children who were under age 16 as of the last day of the PUR or the date that they exited care, as applicable. These children will have a current permanency goal of adoption and will have entered care either before or during the PUR. | |
| Foster Care Category 3 | 10 cases involving children who were under age 16 as of the last day of the PUR or the date they exited care, as applicable, and who entered care during the PUR. These cases could have any permanency goal except adoption. | |
| Foster Care Category 4 | 10 cases involving children who were under age 16 as of the last day of the PUR or the date that they exited care, as applicable, and who entered care prior to the PUR. These cases could have any permanency goal except adoption. | |
| | | This category is intended to allow the random selection of cases with case plan goals other than adoption. These include guardianship, permanent placement with relatives, and other types of cases involving children younger than age 16 with a goal of Other Planned Permanent Living Arrangement. |

After the State receives the list of approximately 150 foster care cases divided into 12 files, 4 for each site, it schedules the cases to be reviewed according to the case order listing, eliminating ineligible cases using the guidance described in section C.3. States should contact the Children’s Bureau Regional Office if one or more of these 12 lists are exhausted before scheduling the target number of cases by category. Each site should have at least two cases per category remaining on the lists as alternates in the event that

cases are eliminated during the onsite review. States should not substitute cases from one list to supplement another list that incurred a shortfall. The ratio of 10 cases per each of the 4 categories should be maintained.

The table below describes a recommended allocation of the foster care case types across the sites, although this precise distribution may not be possible in all situations. (See Appendix K, Suggested Breakout of Cases by Review Site.)

| Suggested Allocation of Foster Care Case Types Across Sites | | | | |
|--|-------------------|---------------|---------------|--------------------|
| Category | Metro Site | Site 2 | Site 3 | State Total |
| Category 1 | 4 | 3 | 3 | 10 |
| Category 2 | 5 | 2 | 3 | 10 |
| Category 3 | 5 | 3 | 2 | 10 |
| Category 4 | 6 | 2 | 2 | 10 |
| Total | 20 | 10 | 10 | 40 |

C.4. Criteria for Eliminating Cases From Sample Lists

Local Site Coordinators should record the reasons for eliminating cases from the sample. In addition, the State should submit to the Children’s Bureau Regional Office for approval a list of any case(s) that it deletes from the sample and provide the reason(s) that it did so. The State may eliminate cases from the sample for the following reasons only:

- Cases in which the key individuals are unavailable during the onsite review week or are completely unwilling to be interviewed, even by telephone. The key individuals in a case are the child (if school age), the parent(s), the foster parent(s), the family caseworker, and other professionals knowledgeable about the case.

There may be cases, however, that should not be eliminated even though key individuals are unavailable. Before eliminating these cases, the State should determine whether sufficient information and perspectives can be obtained from the available parties. If the State determines that the case should be eliminated, it should consult with the Children’s Bureau Regional Office for approval to eliminate the case.

Cases involving out-of-county or out-of-State family members or services are considered on a case-by-case basis, depending on the availability of key individuals. Children on runaway status should not be eliminated from the sample unless it has been determined that pertinent information needed to complete the Onsite Review Instrument cannot be obtained from other available parties, such as the guardian ad litem or other significant individuals. Local Site Coordinators

- should make reasonable efforts to seek the participation of key individuals in the case (though without pressuring them) to ensure the validity of the random sample.
- An in-home services case open for fewer than 60 consecutive days during the period under review.
 - An in-home services case in which any child in the family was in foster care for more than 24 hours during the period under review.
 - An in-home services case in which any child in the family was in foster care during the 8-month sampling period or who entered foster care from the period after the 8-month sampling period up to the first day of the onsite review.
 - A foster care case open fewer than 24 hours during the period under review.
 - A foster care case in which a child was on a trial home visit (placement at home) during the entire period under review. If the child was in a foster care placement for any portion of the period under review, the case should stay in the foster care sample.
 - A case reported to AFCARS in error, such as:
 - A foster care case that was officially closed before the period under review, resulting in no State responsibility for the case.
 - A case open for subsidized adoption payment only (if the case also was open for in-home services for at least 60 days during the sampling period, the case may be reviewed as an in-home services case).
 - A case in which the target child reached the age of majority as defined by State law (18 years old in most States) before the period under review. Cases in which the child reached the age of majority during the period under review should be kept in the sample and reviewed until the time the child reached the age of majority.
 - A case in which the selected child is or was in the care and responsibility of another State, and the State being reviewed is providing supervision through an Interstate Compact for the Placement of Children (ICPC) agreement.
 - A case appearing multiple times in the sample, such as a case that involves siblings in foster care in separate cases or an in-home services case that was opened more than one time during a sampling period. If siblings appear on the list, the State should select the case of the child that appears first on the list and skip the cases of the other children or other cases involving the same family.

- A foster care case in which the child’s adoption or guardianship was finalized before the period under review and the child is no longer under the care of the State child welfare agency.
- Situations in which case selection would result in over-representation of child welfare agency staff, such as when more than two cases in one site are from the caseload of a single caseworker. In such situations, with approval from the Children’s Bureau Central and Regional Offices, cases may be eliminated from the list, as necessary, to ensure that cases are distributed among additional caseworkers.
- Situations in which case selection would result in over-representation or under-representation of juvenile justice cases. In these circumstances, cases should be eliminated to ensure distribution across the program areas being reviewed; prior approval from the Children’s Bureau Central and Regional Offices is required.
- A case in which the child was placed for the entire period under review in a locked juvenile facility or other placement that does not meet the Federal definition of foster care.

The cases in the sample of approximately 150 cases that are not selected for review may serve as substitute cases to replace any selected cases that are eliminated on site or to resolve discrepancies. (See chapter 5, section C, for information on resolving discrepancies.)

C.5. Case Sampling Issues Surfacing at the Time of the Onsite Review or Resulting From Discrepancies

The NRT Local Site Leader and the Local Site Coordinator will need to approve decisions to eliminate a case because of last-minute developments that result in insufficient information being available to review the case. If an interview with a critical party to the case is cancelled at the last minute, for example, the case should be eliminated from the sample. The NRT Local Site Leader and Local Site Coordinator then should consider whether sufficient time exists to use a substitute case.

If the State already has identified alternate cases, using the procedures for case selection described in this chapter, it should substitute those cases by following the numerical order provided in the sample. If the State has not previously identified alternate cases, it should use the original sample and follow the sampling procedures described in this chapter to select the substitute case(s).

The State also may draw from these cases to resolve discrepancies between information in the Statewide Assessment and the findings of the onsite review should additional cases need to be reviewed to resolve the discrepancies. (See chapter 5, section C, for information on resolving discrepancies.)

In addition, if during the onsite review an in-home services case is found to have included an episode of foster care during the period under review, it may be reviewed as a foster care

case only when an alternative in-home services case cannot be substituted. A foster care case found during the onsite review to involve a family that has received in-home services during the entire period under review may be reviewed as an in-home services case only when no alternative foster care cases can be scheduled, provided no child in the family was in foster care during the period under review.

C.6. Preparation of the Case Records for Review

All case records to be reviewed should be available at the review sites in their entirety, including applicable information for periods preceding the period under review. Case records also should be as orderly and up to date as possible, including any files maintained separately, such as separate child protective services files or separate child and family records. Caseworkers and/or supervisors assigned to these cases also should be available for interviews.

If the child welfare agency uses electronic files instead of or in addition to paper files, the Local Site Coordinator needs to: (1) make computers and technical support available to reviewers so that they can view the electronic records, (2) obtain hard copies of the files or the portions of the files containing information relevant to the review, or (3) use a combination of these two approaches.

If necessary, the State agency obtains confidentiality statements or releases of information before the onsite review to permit reviewers to read case records and conduct case-related interviews. In addition, the Child Welfare Review Projects require that all consultants serving on the Federal team sign an agreement that includes a confidentiality provision.

C.7. Case-Related Interviews

Onsite Review Team members are responsible for reviewing the case record and interviewing the individuals involved in the cases to which they are assigned. The Local Site Coordinators schedule the case-related interviews to take place after the case record reviews. Reviewers should read the case record before conducting case-related interviews, which will enable them to explore relevant issues with each person interviewed.

The following individuals related to a case will be interviewed unless they are unavailable or completely unwilling to participate:

- The child (school age).
- The child's parent(s).
- The child's foster parent(s), pre-adoptive parent(s), or other caregiver(s), such as a relative caregiver or group home houseparent, if the child is in foster care.
- The family's caseworker. (When the caseworker has left the agency or is no longer available for interview, it may be necessary to schedule interviews with the supervisor who was responsible for the caseworker assigned to the family.)

- Other professionals knowledgeable about the case. (When numerous service providers are involved with a child or family, it may be necessary to schedule interviews only with those most recently involved, those most knowledgeable about the family, or those who provide the primary services the family is receiving. More than one service provider may be interviewed.)

As needed, on a case-by-case basis, other individuals who have relevant information about the case also may be interviewed, such as the child's guardian ad litem or advocate, or other family members.

Only school-age children are interviewed, unless other arrangements are made with the State. Cases involving preschool-age children may be reviewed but do not require an interview with the child. Instead, the reviewers might observe the child in the home while interviewing the birth or foster parent(s). It is recommended that the State arrange for the assigned caseworker to visit with any child interviewed in the course of an onsite review as soon as possible after the interview to address any issues that may have surfaced.

If possible, interviews with parents, foster parents, and children should be conducted in their homes or foster homes. Service providers may be interviewed wherever is most convenient for them and the review team. When travel arrangements and the schedules of reviewers preclude travel to those locations, or when persons to be interviewed prefer not to have reviewers in their homes or offices, the Local Site Coordinators may arrange to hold the interviews in a central location. Telephone interviews also may be arranged for individuals located outside the review site.

Local Site Coordinators should allow time at the beginning of each day for reviewers to read the cases before the first interview is scheduled. Local Site Coordinators should schedule each interview for 1 hour or less and allow time between interviews for travel between the appointments. Local Site Coordinators also should prepare, in advance, maps or other written directions to the interview sites and provide these to each pair of reviewers. In addition, Local Site Coordinators plan transportation to the interviews; the Child Welfare Review Projects can arrange for rental cars for up to eight consultants who serve as Federal members of the Onsite Review Team. Federal staff usually can rent cars.

Unless specific concerns exist about having reviewers interview someone alone, the assigned caseworker should not be present at the interview. In addition, if concerns exist about the safety of reviewers, or other issues related to the interview, the Local Site Coordinator should take the necessary precautions, such as arranging for the interview to be held in the local child welfare agency office. If special accommodations are required to complete an interview, for example, to address language needs, the Local Site Coordinator makes the necessary arrangements, including obtaining an interpreter, if needed. The consultant pool from which Federal Review Team members are drawn includes individuals with an array of language skills. The Local Site Coordinator should let the State CFSR coordinator know in advance if it would be helpful to have reviewers with special language skills assigned to their site, and the Children's Bureau will work to accommodate the request whenever possible.

The Local Site Coordinator or his or her designee should prepare the individuals to be interviewed, including helping them to understand the purpose of the review. The interviewees should be informed that their participation is voluntary but is critical to the success of the review. Once the Local Site Coordinator has scheduled the interviews, the appointments should be confirmed in writing. (See Appendix G, Preparation for Interviews.)

If, while reviewing a case, reviewers suspect that a child has been, or is in danger of being, maltreated or is at risk of harm, they are obligated to report that information immediately to one of the Local Site Leaders. The Local Site Leaders will report the concerns to an appropriate staff member of the local child welfare agency.

D. State and Local Stakeholder Interviews

The onsite review includes interviews with State or local representatives (stakeholders) who are knowledgeable about the functioning of the agency in the State and community. The purpose of these interviews is to obtain information about the systemic factors under review and how these affect the outcomes of children and families in general, rather than the outcomes of specific children and families. Stakeholder interviews are distinct from case-related interviews, which are designed to elicit information about specific cases. Information from the stakeholder interviews is used in combination with information from the Statewide Assessment to determine the State's conformity with the CFSP and other program requirements for each of the systemic factors.

The Local Site Leaders interview a complete set of stakeholders at each review site to obtain the local perspective. The Team Leaders interview stakeholders at the State level to obtain a broader, statewide perspective. (See sections D.1. and D.2. below for lists of State and local stakeholders.)

The perspectives and knowledge of individual stakeholders vary, which affects the systemic issues that they can discuss. It is unlikely that individual stakeholders will be able to address each systemic factor with equal knowledge. The Team Leaders (State level) and Local Site Leaders (local site level) must ensure that the combined information obtained from the stakeholder interviews adequately addresses the seven outcomes and seven systemic factors that the CFRs are designed to assess. The Children's Bureau Regional Office and State must ensure that a sufficient number of stakeholders who have the knowledge to address each systemic factor under review are scheduled for interviews.

An automated Stakeholder Interview Guide is provided to guide Team Leaders and Local Site Leaders in interviewing stakeholders. The Children's Bureau Team Leader, in collaboration with the State and the Children's Bureau Central Office, identifies State-specific issues from the Statewide Assessment that need further examination through stakeholder interviews. These are listed in the appendix of the Stakeholder Interview Guide before the onsite review so that Local Site Leaders explore the same issues in the three review sites. The Stakeholder Interview Guide is available on the Children's Bureau Web site at www.acf.hhs.gov/programs/cb.

Team Leaders or Local Site Leaders may prefer to have Local Site Coordinators set up group meetings or focus groups with some stakeholders in place of individual interviews; this option can be discussed during a review planning conference call. Group meetings generally should be limited to 8–10 individuals whose interests and involvement in child and family services are similar; for example, groups of foster parents, law enforcement or education representatives, caseworkers, supervisors, or program managers. The State should avoid mixing groups in a way that would limit feedback, such as pairing contracted providers with staff of the overseeing agency or caseworkers with their supervisors. Some interviews should be conducted individually, such as with a juvenile court judge or the director of the State or local child welfare agency.

If possible, State and local stakeholder interviews should be scheduled during regular work hours because the review teams often meet in the evenings for team debriefings. It may be impossible, however, to schedule all interviews during regular work hours. If evening interviews are necessary, the Local Site Coordinators should arrange them at times that do not conflict with the debriefing schedule. If evening group interviews must occur, for example, a focus group with foster parents, these should be arranged as early in the week as possible, preferably on Monday night.

D.1. State Stakeholder Interviews

In each State, interviews are scheduled with stakeholders who can address issues of concern to the State as a whole. The Team Leaders conduct these State stakeholder interviews. If the location of the stakeholders relative to the review team presents a logistical problem, the Team Leaders may conduct interviews by telephone. The State Team Leader will provide background information to the stakeholders before the interviews (see Appendix G, Preparation for Interviews).

Before the onsite review, the State Team Leader schedules State stakeholder interviews, in collaboration with the NRT and Children’s Bureau Regional Office Team Leaders, and confirms the appointments in writing. No more than 10–12 State stakeholder interviews should be scheduled, unless the NRT or Children’s Bureau Regional Office Team Leaders request additional interviews. The interviews usually should be arranged to last 1 hour (1½ hours for groups), and the schedule should allow for travel between appointments.

The following State stakeholders should be scheduled for interviews:

- State child welfare director
- State child welfare program specialists (for example, foster care, child protective services, adoption, training, licensing, quality assurance, independent living, prevention, and automated systems); separate interviews with these specialists help to focus the interviews on specific State child welfare agency functions and programs

- State court system representative(s), including but not limited to the Court Improvement Program Coordinator and the Chief Justice of the State’s Supreme Court, who is notified of the review by the Children’s Bureau Regional Office
- Tribal representatives
- State representative(s) of administrative review bodies; for example, foster care review boards, if they exist
- Youth being served by the State child welfare agency, particularly those eligible for independent living services (If the agency has an organized youth advisory group, that group may be the best forum for interviewing youth representatives. Some States do not have a statewide youth advisory group and, therefore, may schedule youth group interviews at the local level, if desired.)
- Representatives from the State foster care and/or adoptive parent association

Additional State stakeholders may be selected from among the individuals whom the State consulted in developing its CFSP, such as representatives from the:

- State education system
- State youth service agency
- State health department
- State Medicaid program
- State mental health agency
- State-level child welfare advocacy organizations
- University social work education program
- Major child welfare-related initiative/project

D.2. Local Stakeholder Interviews

Before the onsite review, the Local Site Coordinator schedules a maximum of 10–12 local stakeholder interviews at each review site, unless the NRT or Children’s Bureau Local Site Leaders request additional interviews. At the metropolitan site, where there typically are two review teams, the State Team Leader should create one schedule of local stakeholder interviews. The Local Site Leaders for the two review teams then meet to discuss how they will manage the interviews.

Local stakeholder interviews usually should be scheduled to last 1–2 hours, depending on the number of individuals to be interviewed, and the schedule should allow for travel between appointments. Focus groups, for example, require at least 1½–2 hours, while most individual interviews require only 1–1½ hours. In some situations, less than an hour may be needed if the stakeholder is to be interviewed about a specific topic such as quality assurance. Interviews with child welfare agency administrators and others with broad responsibilities usually require 1½ hours.

Local stakeholder interviews may be conducted either at the local agency or where the stakeholders are located. The Local Site Coordinator should prepare the stakeholders for the interviews and confirm the appointments in writing. (See Appendix G, Preparation for Interviews.)

The following local stakeholders must be scheduled for interviews at each review site:

- Local child welfare agency administrator
- Foster and adoptive parents (preferably a small-group meeting)
- Juvenile court judge (or the judge’s designated court representative)
- Law enforcement representative
- Caseworker(s) from the local child welfare agency (preferably a small-group meeting without their supervisors present)
- Supervisor(s) from the local child welfare agency (preferably a small-group meeting)
- Guardians ad litem/legal representatives (individually or in a group)
- Agency attorney(s) (individually or in a group)
- Local representatives of administrative review bodies; for example, foster care review boards, if they exist
- Tribal representatives
- Youth being served by the local child welfare agency, particularly those eligible for independent living services (group meeting)

The State also should schedule separate interviews with local-level staff responsible for training, quality assurance, and licensing functions to determine how effectively those areas are operating. This is especially true for States that have county-administered child welfare systems, where local practice may vary.

Additional stakeholders may be selected from the individuals with whom the State consulted in the development of its CFSP, such as representatives of the following:

- Youth service agencies
- Major child welfare initiatives/projects
- Major service providers
- Mental and physical health agencies
- Educational institutions, including special education or early intervention coordinators
- Local child and family advocacy organizations

E. Promising Approaches

During case record reviews, case-related interviews, and stakeholder interviews, review team members should be alert for innovative child welfare practices and inform the designated Local Site Leader about promising approaches identified. Promising approaches can be casework-related or systemic and include State and private initiatives that have measurable outcomes and are based on the key practice principles believed to support positive outcomes for children and families: family-centered practice, community-based services, individualizing services that address the unique needs of children and families, and strengthening parents' capacity to protect and provide for their children. At the debriefing at each local site, the NRT Local Site Leader facilitates a discussion of promising approaches identified by the Onsite Review Team.

F. Team Debriefings

The review teams at each site meet daily during the onsite review to discuss the day's activities. The debriefings, which are facilitated by the NRT Local Site Leader, are the designated forum for individual reviewers to present their cases and their rationale for the answers recorded on the Onsite Review Instrument. The debriefings provide an opportunity for Local Site Leaders and reviewers to ensure that all reviewers are consistent and are able to substantiate their findings with adequate information. The debriefings provide opportunities for case discussion within a structured agenda to ensure that all cases are adequately debriefed by the team. Attendance at the debriefings is limited to Local Site Leaders, reviewers, and one State representative who does not supervise any cases under review at the local site. This State representative is included as an observer only and may not participate actively in the debriefings or ratings of the cases.

The debriefings should occur following the day's onsite review activities. During the debriefings, the local review team does the following:

- Team members who have completed case reviews that day briefly summarize their case(s) for the team and explain the rating for each outcome, on the basis of the items considered under each outcome.
- Local Site Leaders who have interviewed stakeholders briefly summarize the interviews, addressing the systemic issues examined in the interviews.
- Team members identify any problems or concerns regarding the schedules, logistical arrangements, instruments, or other areas.
- Local Site Leaders determine whether all review activities are proceeding according to schedule and whether adjustments to the schedule or workflow are needed.

On Thursday morning or afternoon of the review week, once all activities are completed at the review site, the NRT Local Site Leader convenes the local review team for a final local site debriefing. During this final debriefing, the Local Site Leaders use the CFSR Data Management System to complete the Summary of Findings Form for their site, incorporating information on all cases reviewed and all stakeholder interviews. The completed Summary of Findings Form is submitted electronically to the Team Leader. Following the debriefing, the NRT Local Site Leader holds a local exit conference and provides a verbal report to the local site, offering preliminary information regarding the local review findings, including strengths and areas needing improvement. This allows for the sharing of detailed, site-specific information with the local participants who are most likely to benefit, including but not limited to caseworkers, supervisors, or local administrators. Consultant reviewers are dismissed from the review following the local exit conference.

On Friday, the three local sites come together for a debriefing and exit conference facilitated by the NRT Team Leader. The Local Site Leaders, including the State Local Site Leader, represent the local site team at the Friday debriefing and exit conference. Attendance of State reviewers at the Friday debriefing and exit conference is not required, but is at the option of the State.

Before the debriefing, the Team Leader uses the compiled results from the three review sites to facilitate a discussion of the review findings. Unlike the local site debriefings, in which attendance is limited to the review team and one State representative, key State child welfare agency staff who are not part of the Onsite Review Team may observe the statewide debriefing. The State, in consultation with the Children's Bureau Regional Office Team Leader, may invite key State agency staff to attend who they believe will benefit from hearing about the findings at the local level and should consider including staff who will have major responsibility for planning program improvements.

Subsequently, at the statewide exit conference on Friday afternoon, the NRT Team Leader provides the State with a PowerPoint presentation generated using the CFSR Data

Management System on the preliminary findings regarding the outcomes and systemic factors. This allows the review team to identify for the State the key areas on which the State should focus in developing its Program Improvement Plan. The findings are presented as preliminary because a complete analysis of the information is not possible until after the onsite review. States may invite participants of their choosing to the statewide exit conference.

The determination of the State's substantial conformity is included in the written Final Report provided to the State following the onsite review. (See chapter 6 for information on the preparation and distribution of the Final Report.)

Chapter 5

Determination of Substantial Conformity

After the completion of the onsite review phase of the Child and Family Services Reviews (CFSRs), the Children’s Bureau Regional Office, in conjunction with the National Review Team (NRT) Team Leader makes a determination regarding substantial conformity for each of the seven outcomes and seven systemic factors under review. The requirements for determining substantial conformity are set forth at 45 Code of Federal Regulations (CFR) §1355.34. States may be determined to be in substantial conformity with one or more outcomes and systemic factors and not in substantial conformity with the others. These findings, along with information on the State child welfare agency’s strengths and areas needing improvement in serving children and families, are submitted to the State in a Final Report prepared by the Children’s Bureau Regional Office after the onsite review. (See chapter 6 for information on the Final Report.)

Program Improvement Plans (PIPs) are prepared, and financial penalties are assessed, if necessary, only for outcomes or systemic factors determined not to be in substantial conformity. (See chapter 7 for information on the preparation of the PIP.) Different methods are used to determine substantial conformity with the outcomes and the systemic factors. Appendix H, Pathway to Substantial Conformity, displays the data indicators and criteria for determining substantial conformity with the outcomes and the systemic factors.

This chapter describes the process for determining substantial conformity with the outcomes and systemic factors, including rating items and comparing data indicators with the national standards. It also provides information on resolving discrepancies between the findings of the Statewide Assessment and the onsite review, either through the provision of additional information or the review of additional cases.

A. Determination of Substantial Conformity With the Outcomes

During the Statewide Assessment and onsite review, the review team assesses seven outcomes in three domains (safety, permanency, and child and family well-being) by examining 23 items. (See Appendix B, Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators.)

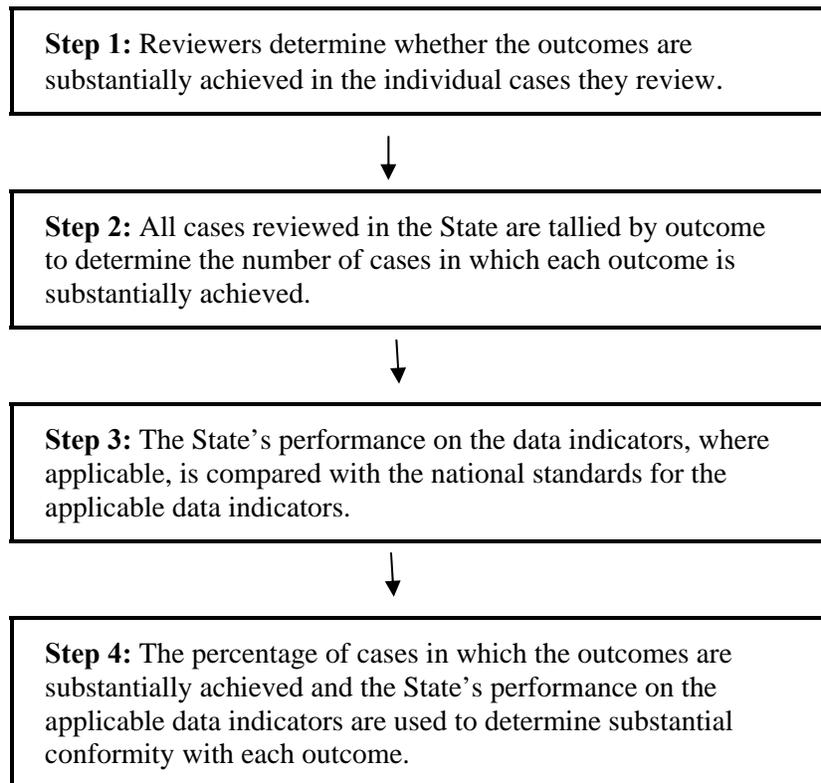
For two of the seven outcomes, Safety Outcome 1 and Permanency Outcome 1, decisions about substantial conformity are based on both the data indicators and the onsite case

review findings. For these outcomes, the following performance indicators are used to determine substantial conformity:

- The State’s performance on the related data indicators (national standards have been established for four data indicators for Permanency Outcome 1, and two data indicators for Safety Outcome 1)
- The percentage of cases reviewed on site in which the outcome was determined to be substantially achieved (95 percent)

For the remaining five outcomes, Safety Outcome 2, Permanency Outcome 2, and the three Child and Family Well-Being Outcomes, the percentage of cases reviewed on site in which the outcome was determined to be substantially achieved is used to determine substantial conformity (95 percent).

Following the onsite review, the Children’s Bureau Regional Office, in collaboration with the NRT Team Leader for the review, uses the data gathered through the Statewide Assessment and onsite review to make determinations regarding substantial conformity with the outcomes for the State as a whole. The diagram below illustrates the process of determining substantial conformity with the outcomes.



Below is an overview of how case records and statewide data are examined to determine conformity.

A.1. Determination of Conformity With the Outcomes: Case Record Reviews

Pairs of reviewers, comprising one Federal Review Team member and one State Review Team member, conduct case record reviews. (See chapter 2, section C, for more information on the Onsite Review Team, and chapter 4 for more information on the onsite review.) Each pair of reviewers gathers information on a case by reviewing the case record and conducting case-related interviews. Reviewers use the automated Child and Family Services Reviews Onsite Review Instrument in conducting the case record reviews. The Instrument lists the items that reviewers examine in assessing achievement of each outcome. For each case, once the reviewers have examined the items and entered the relevant information, the automated Instrument provides a rating for each item of strength, area needing improvement, or not applicable. The system then records whether, for each case, each of the seven outcomes was substantially achieved, partially achieved, not achieved, or not applicable.

The outcomes are rated using the following guidelines (see the Onsite Review Instrument and Instructions, which is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb):

- Substantially achieved: The required number of applicable items are rated as strengths.
- Partially achieved: Some applicable items are rated as strengths, but the number does not meet the level required for the outcome to be rated as substantially achieved.
- Not achieved: None of the applicable items is rated as a strength.
- Not applicable: None of the items is applicable.

To rate an outcome as substantially achieved, the following criteria must be met:

- Safety Outcome 1, “Children are, first and foremost, protected from abuse and neglect”: All applicable items are rated as strengths (disregard items rated as not applicable).
- Safety Outcome 2, “Children are safely maintained in their homes whenever possible and appropriate”: All applicable items are rated as strengths (disregard items rated as not applicable).
- Permanency Outcome 1, “Children have permanency and stability in their living situations”: Item 7 and the relevant item (8, 9, or 10) rated for this case must be rated as strengths, and no more than one of either items 5 and 6 (if applicable)

may be rated as an area needing improvement (disregard items rated as not applicable). If the State is using concurrent planning for the case being reviewed and, therefore, the reviewer rated two of the relevant items (8 and 9, 8 and 10, or 9 and 10), then both must be rated as strengths.

- Permanency Outcome 2, “The continuity of family relationships and connections is preserved for children”: No more than one of the applicable items for this outcome is rated as an area needing improvement (disregard items rated as not applicable).
- Child and Family Well-Being Outcome 1, “Families have enhanced capacity to provide for their children’s needs”: Item 17 must be rated as a strength, plus no more than one of the remaining applicable items may be rated as an area needing improvement (disregard items rated as not applicable).
- Child and Family Well-Being Outcome 2, “Children receive appropriate services to meet their educational needs”: Item 21 is rated as a strength.
- Child and Family Well-Being Outcome 3, “Children receive adequate services to meet their physical and mental health needs”: All applicable items are rated as strengths (disregard items rated as not applicable).

A.2. Determination of Substantial Conformity With the Outcomes: Data Indicators

The regulation at 45 CFR §1355.34, which sets forth the requirements for determining substantial conformity through the CFSRs, includes the establishment of national standards for certain data indicators. These standards are used in conjunction with case record reviews to determine substantial conformity under titles IV-B and IV-E of the Social Security Act. The national standards are based on information that States report to the Adoption and Foster Care Analysis and Reporting System (AFCARS) and the National Child Abuse and Neglect Data System (NCANDS).

A.2.1. National Standards Used During the Second Round of Reviews

For the second round of reviews, the Children’s Bureau will use six data indicators to determine substantial conformity with two outcomes. The data indicators include two individual data indicators for Safety Outcome 1 and four data indicators in the form of composites for Permanency Outcome 1. Each of the four composites incorporates one or more components. Components are the general factors that contribute to the composite score. Each component comprises two or more measures.

Two individual data indicators rather than composites are used as part of the assessment of substantial conformity with Safety Outcome 1. These data indicators are:

- Absence of maltreatment recurrence. Of all children who were victims of substantiated or indicated abuse or neglect during the first 6 months of the

reporting year, what percent did not experience another incident of substantiated or indicated abuse or neglect within a 6-month period?

- Absence of child abuse and/or neglect in foster care. Of all children in foster care during the reporting period, what percent were not victims of a substantiated or indicated maltreatment by foster parents or facility staff members?

For each composite related to Permanency Outcome 1, the Children's Bureau used the distribution of county scores across States to establish six separate national standards, one for each composite. Because the primary purpose of a data composite is to capture overall performance in a particular domain, the Children's Bureau did not establish national standards for the individual measures incorporated in the permanency composites. Therefore, States are not expected to meet a standard for any individual permanency measures, but to achieve an overall performance level in the composites related to Permanency Outcome 1. However, the Children's Bureau will provide States with information regarding each individual measure within the composites, including the mean, median, and range of scores across States, to enable States to identify the individual measures within a composite where improvements are needed.

The four data indicators that will be used as part of the assessment of substantial conformity with Permanency Outcome 1 are:

- Permanency Composite 1: Timeliness and Permanency of Reunifications. The following components and measures are included in this composite:
 - Component 1: Timeliness of reunification. The following measures are included in this component:
 - Of all children discharged from foster care to reunification in FY 2004 who had been in foster care for 8 days or longer, what percent were reunified in less than 12 months from the date of the latest removal from home?
 - Of all children exiting foster care to reunification in 2004 who had been in foster care for 8 days or longer, what was the median length of stay in months from the date of the most recent entry into foster care until the date of reunification?
 - Of all children entering foster care for the first time in the second 6 months of FY 2003 who remained in foster care for 8 days or longer, what percent were reunified in less than 12 months of the date of entry into foster care?
 - Component 2: Permanency of reunification
 - Of all children exiting foster care to reunification in FY 2003, what percent re-entered foster care in less than 12 months?

- Permanency Composite 2: Timeliness of Adoptions. The following components are included in this composite:
 - Component 1: Timeliness of adoptions of children exiting foster care.
 - Of all children who were discharged from foster care to a finalized adoption in FY 2004, what percent was discharged in less than 24 months from the date of the latest removal from the home?
 - Of all children who were discharged from foster care to a finalized adoption in FY 2004, what was the median length of stay in foster care (in months) from the date of removal from the home to the date of discharge?
 - Component 2: Progress toward adoption of children who have been in foster care for 17 months or longer.
 - Of all children in foster care on the first day of FY 2004 who were in foster care for 17 continuous months or longer, what percent was discharged from foster care to a finalized adoption before the end of the fiscal year?
 - Of all children in foster care on the first day of FY 2004 who were in foster care for 17 continuous months or longer, what percent became legally free for adoption in less than 6 months from the beginning of the fiscal year?
 - Component 3: Timeliness of adoptions of children who are legally free for adoption.
 - Of all children who became legally free for adoption during FY 2003, what percent were discharged from foster care to a finalized adoption in less than 12 months of becoming legally free?
- Permanency Composite 3: Achieving permanency for children in foster care. The following components are included in the composite:
 - Component 1: Achieving permanency for children in foster care for long periods of time.
 - Of all children who were discharged from foster care in FY 2004 who were legally free for adoption (i.e., there was a termination of parental rights (TPR) for each living parent), what percent were discharged to a permanent home prior to their 18th birthday, with a permanent home defined as having a discharge reason of adoption, reunification (including living with relative), or guardianship?

- Of all children who were in foster care for 24 months or longer on the first day of FY 2004, what percent were discharged from foster care to a permanent home prior to their 18th birthday and by the end of the fiscal year?
- Component 2: Children growing up in foster care.
 - Of all children who were emancipated from foster care or reached their 18th birthday while in foster care, what percent had been in foster care for 3 years or longer?
- Permanency Composite 4: Placement stability. The following components are included in this composite:
 - Component 1: The principal components analysis for this composite yielded one component that incorporates the following three measures:
 - Of all children in foster care in FY 2004 who were in foster care for 8 days or longer and less than 12 months, what percent had two or fewer placement settings?
 - Of all children in foster care in FY 2004 who were in foster care for at least 12 months but less than 24 months, what percent had two or fewer placement settings?
 - Of all children in foster care in FY 2004 who were in foster care for 24 months or longer, what percent had two or fewer placement settings?

A.2.2. Failure To Meet the National Standards

If the State's data fail to meet the national standards, the State is required to implement a PIP designed to improve the State's performance on each outcome for which the data indicators do not meet the standards. (The criteria for determining the amount of improvement that must be achieved through a PIP are discussed in chapter 7.)

The goal of the CFRs is continuous quality improvement. A State, therefore, whose data remain below a national standard in subsequent reviews is required to establish new benchmarks for improvement, with the goal of eventual attainment of the standard. As long as the State reaches the level of improvement agreed to in the PIP for a data indicator, failure to reach the national standard on an indicator is not a basis for withholding Federal funds.

Below are two examples of determining substantial conformity using the case record ratings and data indicators.

Example 1

The following example illustrates how cases reviewed on site are tallied by outcome, as part of determining whether the State is in substantial conformity. In this example, assume that this was the State’s second review and that the data indicators met the national standards for Safety Outcome 1 and Permanency Outcome 1. The CFSR Data Management System tallies the ratings for the cases reviewed onsite, as shown in the following table.

| Outcome | Number of Cases Substantially Achieved | Number of Cases Partially Achieved | Number of Cases Not Achieved | Percentage of Cases Substantially Achieved ¹ N=65 ² N=40 |
|---|---|---|-------------------------------------|---|
| Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect. | 54 | 11 | 0 | 83% ¹ |
| Safety Outcome 2: Children are safely maintained in their homes whenever possible and appropriate. | 62 | 0 | 3 | 95% ¹ |
| Permanency Outcome 1: Children have permanency and stability in their living situations. | 21 | 8 | 11 | 52% ² |
| Permanency Outcome 2: The continuity of family relationships and connections is preserved for children. | 40 | 0 | 0 | 100% ² |
| Child and Family Well-Being Outcome 1: Families have enhanced capacity to provide for their children’s needs. | 43 | 12 | 10 | 66% ¹ |
| Child and Family Well-Being Outcome 2: Children receive appropriate services to meet their educational needs. | 65 | 0 | 0 | 100% ¹ |
| Child and Family Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs. | 62 | 3 | 0 | 95% ¹ |

According to the case record review ratings, and the State's performance on the national standards, the State would not be in substantial conformity with: Safety Outcome 1, Permanency Outcome 1, and Child and Family Well-Being Outcome 1.

Example 2

The example below illustrates the process of determining substantial conformity for Permanency Outcome 1, "Children have permanency and stability in their living situations."

The following six items (reviewed on site) and four data indicators are used to determine substantial conformity for Permanency Outcome 1:

- Items:
 - Foster care re-entries
 - Stability of foster care placements
 - Permanency goal for child
 - Reunification, guardianship, or permanent placement with relatives
 - Adoption
 - Other planned permanent living arrangement
- Data Indicators:
 - Permanency Composite 1: Timeliness and permanency of reunifications
 - Permanency Composite 2: Timeliness of adoptions
 - Permanency Composite 3: Achieving permanency for children in foster care
 - Permanency Composite 4: Placement stability

As discussed in sections A.1. and A.2., the items are rated on the basis of the case record reviews, using the Onsite Review Instrument, and the data indicators are obtained from the data profiles included in the Statewide Assessment.

The following must occur for the State to be determined to be in substantial conformity with Permanency Outcome 1:

- The Onsite Review Team must determine that Permanency Outcome 1 was substantially achieved in 95 percent of the cases reviewed.

- The four data indicators for Permanency Outcome 1 must meet the national standards.

In this example, assume that we determine from the case record reviews that 95 percent of the cases reviewed achieved ratings of “substantially achieved” for Permanency Outcome 1. In addition, the Statewide Assessment shows that the State meets the national standards for three of the relevant data indicators (timeliness and permanency of reunifications, achieving permanency for children in foster care, and placement stability), but not for one indicator (timeliness of adoptions).

Because the State did not meet the national standards for all four data indicators, it is not in substantial conformity with this outcome. The State therefore must prepare a PIP to improve its performance on the data indicator that did not meet the standard, “timeliness of adoptions.”

B. Determination of Substantial Conformity With the Systemic Factors

The Child and Family Services Plan (CFSP) and other program requirements provide the basis for determining substantial conformity with each of the systemic factors. (Review team leaders examine 22 items under the systemic factors; these items are listed in Appendix B, Index of Outcomes and Systemic Factors, and Associated Items and Data Indicators.) During the Statewide Assessment, the Statewide Assessment Team compiles and evaluates information on the systemic factors. During the onsite review, the Team Leaders and Local Site Leaders conduct State and local stakeholder interviews to collect the information necessary to evaluate the systemic factors. Using this information, the Children’s Bureau Regional Office, in collaboration with the NRT Team Leader for the review, makes the following determinations regarding each systemic factor:

- Whether the CFSP requirements and other program requirements attached to the systemic factor are actually in place in the State
- Whether the CFSP requirements and other program requirements attached to the systemic factor are functioning as described in the applicable regulation or statute

Because the systemic factors are statewide issues, the NRT Team Leader collects information from the three local review sites by downloading the information collected using the automated Stakeholder Interview Guide. The Children’s Bureau Regional Office, in conjunction with the NRT Team Leader, then makes the final determination of substantial conformity regarding the systemic factors following the onsite review. This information is included in the Final Report, which the Children’s Bureau Regional Office releases to the State after the onsite review.

Six of the seven systemic factors are rated on the basis of multiple CFSP and other program requirements. One systemic factor, “statewide information system,” is rated on the basis of only one CFSP requirement. For a State to be found in substantial conformity with a systemic factor, the information obtained from the Statewide Assessment and

stakeholder interviews must indicate that the required number of CFSP and other program requirements for that factor are in place and functioning as required.

The following table describes how the CFSP and other program requirements are used to determine substantial conformity with the systemic factors, using the ratings shown. For a specific systemic factor to be determined to be in substantial conformity, the Children’s Bureau Regional Office, in collaboration with the NRT Team Leader for the review, must assign it a rating of “3” or “4.”

| Rating the Systemic Factors | | | |
|---|--|--|--|
| Not in Substantial Conformity | | 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. |

Two of the seven systemic factors are rated for substantial conformity slightly differently, as follows:

- The systemic factor, “statewide information system,” has only one CFSP requirement subject to review. If it is determined that this requirement is in place but not functioning as required, this factor is given a rating of “2” rather than “3.”
- Two performance indicators are associated with the systemic factor, “quality assurance system.” For this systemic factor to be in substantial conformity, it must be rated a “3” or “4.” To be rated a “4,” both items must be in place in the State and functioning at the required level. To be rated a “3,” both items must be in place and item 31 must be functioning at the required level; item 30 does not need to be functioning at the required level for a finding of substantial conformity on this systemic factor.

If item 31 is not in place or is not functioning at the required level, however, the systemic factor is rated either a “1” or “2” depending on the State’s performance on item 30. If item 30 is in place, but not functioning, the factor is rated a “2.” If item 30 is neither in place nor functioning, the factor is rated a “1.”

B.1. Example of Determining Substantial Conformity With the Systemic Factors

Below is an example of how the method described in section B is used to determine substantial conformity for the systemic factor “case review system.”

The systemic factor, “case review system,” has five CFSP and other program requirements subject to review. For purposes of this example, the Statewide Assessment indicates that policies and procedures are in place statewide that address all five requirements:

- Each child has a written case plan with the required content developed jointly with the child’s parent(s) (item 25 in the Summary of Findings Form).
- The status of each child in foster care is reviewed no less frequently than once every 6 months (item 26).
- Permanency hearings are held as required (item 27).
- TPR petitions are filed under the required circumstances (item 28).
- Foster parents, pre-adoptive parents, and relative caregivers of children in foster care are notified of, and given an opportunity to be heard in, reviews or hearings held with respect to the child (item 29).

While all five requirements are in place, we cannot determine from the Statewide Assessment whether they are functioning properly; the Team Leaders and Local Site Leaders make that determination on the basis of the stakeholder interviews that they conduct during the onsite review.

In this example, assume that those interviews indicated the following:

- The case plan requirement is functioning consistently statewide and in the three local review sites. Item 25, therefore, is rated as a strength.
- The periodic reviews do not occur on a timely basis in two of the three local review sites. Item 26, therefore, is rated as an area needing improvement.
- The permanency hearings are not held according to the requirements of Federal and State law in any of the three local review sites. Item 27, therefore, is rated as an area needing improvement.
- The procedures for TPR are functioning statewide and in all three local review sites. Item 28, therefore, is rated as a strength.
- The required parties are notified of hearings statewide and in all three local review sites. Item 29, therefore, is rated as a strength.

The information from the Statewide Assessment and the onsite review indicates that three of the five CFSP and other program requirements for this systemic factor are both in place statewide and functioning as required, while two are in place but fail to function as required. This systemic factor, therefore, would be rated a 2 and would not be in substantial conformity, according to the table above “Rating the Systemic Factors.”

C. Resolution of Discrepancies Between the Statewide Assessment and the Onsite Review

In some instances, there may be discrepancies between the data indicators, information in the Statewide Assessment, and information on the corresponding items that is obtained during the onsite review.

For example, the State might acknowledge that the onsite review findings accurately reflect State practice, although they differ from the information in the Statewide Assessment or the data indicators. In these situations, the Children’s Bureau can make a determination about substantial conformity or how to rate the performance indicator in which the discrepancy exists. In other circumstances in which there is no clear explanation of the discrepancies, however, they must be resolved before a determination about substantial conformity or how to rate the performance indicator in question can be made.

If the Children’s Bureau Central Office determines that there is a discrepancy in the findings, the Children’s Bureau Regional Office informs the State, in writing, of the discrepancy within 30 days of the onsite review, describes the options available to resolve the discrepancy, and informs the State about the timeframe for responding.

The regulation at 45 CFR §1355.33(d) provides a State with two options for resolving discrepancies:

- The State may submit additional information for the item(s) in which a discrepancy(s) occurred.
- The Children’s Bureau and the State may review additional cases for the item(s) in which a discrepancy(s) occurred.

C.1. Resolution of Discrepancies Through Submission of Additional Information

The standards applied to the review process in determining substantial conformity are the same whether or not a discrepancy exists: applicable data indicators must meet the national standards, and the required percentage of cases reviewed on site must be substantially achieved. States therefore need to determine the most effective option for resolving the discrepancy on the basis of the nature of the discrepancy.

Submitting additional information, for example, is not a reasonable option for resolving a discrepancy when the data indicators meet the national standards, but the case record reviews indicate that in less than 95 percent of the cases, the outcome was determined to

be substantially achieved. In this situation, only a review of additional cases would help to determine whether the State meets the criteria for substantial conformity.

On the other hand, submitting additional information is a reasonable option when, through the case record review, it is determined that in 95 percent or more of the cases, the outcome was determined to be substantially achieved, but the data indicators associated with that outcome fail to meet the national standards. In this case, submitting additional information could resolve the discrepancy by establishing that the State has met the national standards.

Typically, the additional information that the State submits is data related to the national standards:

- In the event that a discrepancy occurred because the State submitted inaccurate data through AFCARS or NCANDS, the State may make corrections to the original AFCARS and NCANDS data and resubmit these data to the Children's Bureau Central and Regional Offices.
- The State may attempt to submit more recent AFCARS or NCANDS data because the onsite review addresses a more recent period than do the AFCARS and NCANDS data submissions used in preparing for the review. By doing so, the State might resolve the discrepancy by showing that the data indicators met the national standards subsequent to the initial submission of the data.

If the State chooses to submit data from a source other than NCANDS, the Children's Bureau must approve the use of the additional data (such as data from a special study or an alternate source). In assessing the alternate data, the Children's Bureau uses the following criteria:

- The Children's Bureau must determine that the results of the special study, or of a State's quality assurance activities, meet rigorous standards of sampling and evaluation, that the special study or quality assurance activities cover the period under review, and that the parameters of the special study or quality assurance activities are consistent with the parameters used to develop the national standard.
- The Children's Bureau must determine that the data conform to the logic used in developing the applicable national standard, that there is ample justification for using data other than NCANDS, and that NCANDS data cannot be corrected to reflect the alternate source of data.

C.2. Resolution of Discrepancies Through Review of Additional Cases

Reviewing additional cases is the best option for resolving a discrepancy in cases in which the following occur:

1. The percentage of cases reviewed on site that are determined to be substantially achieved falls short of the percentage required to establish substantial conformity for the outcome, and
2. The data indicators for the outcome conform to the national standards.

If the State chooses this option, the additional cases are selected from the original samples of in-home services and foster care cases that were drawn for the review. If additional cases are needed to comprise a statistically significant sample, the Children's Bureau Central Office works with the Children's Bureau Regional Office and the State to determine the methods for identifying and selecting the additional cases to be reviewed. (See chapter 4, section C, for more information on case selection and review.)

For the State to be determined to be in substantial conformity through the review of additional cases, on an outcome for which there is a discrepancy, the following conditions must occur:

- The total number of cases, when the additional cases are added to the original sample of cases, comprises a statistically significant sample, with a tolerable sampling error of 5 percent and a confidence coefficient of 95 percent.
- The outcome is determined to have been achieved in 95 percent (90 percent in the initial review) of the cases reviewed.

Typically, about 150 cases are needed to comprise a statistically significant sample at this level. Children's Bureau statisticians are available to assist the Children's Bureau Regional Office staff in determining the exact number of additional cases to be drawn. A joint Federal and State team reviews the additional cases only for the item or outcome in question, and the cases must fall into the original review's period under review. The results of the additional case record review, combined with the results of the original case record review, are the basis for determining substantial conformity.

The Children's Bureau Regional Office determines the timing, process, and review team associated with the additional case record review, on the basis of the number and complexity of the discrepancies to be resolved. When an additional case record review is needed, it follows the onsite review as soon as possible so that a prompt and accurate determination regarding substantial conformity can be made.

Chapter 6

Final Report

The Final Report is a compilation of information on the State agency's strengths and areas needing improvement regarding each of the outcomes and systemic factors reviewed through the Child and Family Services Reviews (CFSR). The primary purpose of the Final Report is to document, for the State, the determination of substantial conformity or nonconformity in each area reviewed. The review findings, supported by information from the Statewide Assessment, Onsite Review Instruments, and Stakeholder Interview Guides, form the basis of the report.

In preparing the report, the Children's Bureau Central and Regional Office staff analyze the review findings to determine substantial conformity. The Children's Bureau Central Office, through a contractor, prepares the Final Report in collaboration with the Children's Bureau Regional Office. Using the information in the report, the State then addresses, through the Program Improvement Plan (PIP) process, areas determined not to be in substantial conformity.

This chapter provides information on the format and content of Final Reports and the procedures for preparing and distributing reports.

A. Preparation of the Final Report

The information that appears in the Final Report is gathered at two points in the review process:

- After the State submits the Statewide Assessment, which includes the data profile, the Children's Bureau Regional Office prepares the Preliminary Assessment of the outcomes and systemic factors under review on the Summary of Findings Form. In the Preliminary Assessment, the Children's Bureau Regional Office summarizes and analyzes the major issues affecting substantial conformity.
- The review team gathers information during the onsite review from case record reviews and stakeholder interviews.

The Children's Bureau Central Office staff and contractor work collaboratively with the Children's Bureau Regional Office and the National Review Team (NRT) Team Leader to produce the initial draft of the Final Report by analyzing the review data and

summarizing information from other sources, such as the stakeholder interviews, the Statewide Assessment, and the Preliminary Assessment.

The analysis in the report focuses on the strengths and areas needing improvement identified through each of the items related to the outcomes and systemic factors. The supporting information indicates which items contributed to achievement or lack of achievement of the outcomes or systemic factors. Only those findings that can be supported by evidence from the Statewide Assessment, Onsite Review Instruments, and Stakeholder Interview Guides are included in the Final Report.

B. Content of the Final Report

The completed Final Report to the State includes the following:

- **Cover letter:** The cover letter includes a statement about substantial conformity; the amount of the penalty, if applicable; and the date by which a PIP must be submitted to the Children’s Bureau Regional Office, if applicable.
- **Executive summary:** This section summarizes the major strengths and areas needing improvement noted for each outcome and systemic factor and the status of each regarding substantial conformity. The opening paragraphs of the executive summary should note clearly the number of outcomes and systemic factors in which the State was determined to be in substantial conformity and the most significant strengths and areas needing improvement. These paragraphs should specifically note findings that involve other major participants in the State’s child welfare programs, such as the courts and tribes, to focus on the need for interagency collaboration through the PIP process. After this overview in the opening paragraphs, the executive summary should include a list of the outcomes and systemic factors, and a brief description of the findings regarding each.
- **Introduction:** This section provides an overview of the background and purposes of the review; the outcome areas reviewed; dates and descriptions of the review activities, such as the period under review; methods used to complete the Statewide Assessment; review sites; and number of each type of case reviewed (in-home services and each of the four categories of foster care cases; see chapter 4, section C, for information on the case selection and review process).
- **Summary of findings:** This contains detailed information on the findings of the review regarding each outcome and systemic factor and the determination of the State’s substantial conformity.

The information recorded under each item in the report is specific to the item, and relevant to the applicable Child and Family Services Plan (CFSP) requirements for the item. In addition, each item must be addressed using only information obtained during the review process. Further, to protect the confidentiality of individual children, families, and representative stakeholders, the report does not include names of persons or organizations from whom information was obtained.

B.1. Example of a Final Report

The example below provides an excerpt from the Summary of Findings Form, illustrating how the Preliminary Assessment example in chapter 3 is updated with information from the onsite review for the Final Report for one of the items.

| Example/Excerpt From a Final Report | | | | | |
|---|--------------------------|--------------------|-----------------------|-------------------------------|-------------------------|
| II. PERMANENCY | | | | | |
| Permanency Outcome 1: Children have permanency and stability in their living situations. | | | | | |
| Number of cases reviewed by the team according to degree of outcome achievement: | | | | | |
| | Site Name 1 | Site Name 2 | Site Name 3 | Total Number | Total Percentage |
| Substantially Achieved: | 4 | 3 | 2 | 9 | 36.0 |
| Partially Achieved: | 5 | 2 | 3 | 10 | 40.0 |
| Not Achieved or Addressed: | 3 | 2 | 1 | 6 | 24.0 |
| Not Applicable: | 12 | 6 | 7 | 25 | |
| Conformity of data indicators with national standards: | | | | | |
| | National Standard | State Score | Meets Standard | Does Not Meet Standard | |
| Timeliness and permanency of reunifications | | | | | |
| Timeliness of adoptions | | | | | |
| Achieving permanency for children in foster care | | | | | |
| Placement stability | | | | | |

Continued

Example/Excerpt From a Final Report (*continued*)

STATUS OF PERMANENCY OUTCOME 1

The State did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 36 percent of the cases reviewed, which is less than the 95 percent required for an overall rating of substantial conformity.
- The fiscal year (FY) 2006 data provided in the State data profile indicate that for FY 2006, the State did not meet the national standards for (1) timeliness and permanency of reunifications or (2) achieving permanency for children in foster care.

The State data profile also indicates that the State met the national standards for (1) timeliness of adoptions and (2) placement stability.

A key finding of the case record reviews was that all six items for Permanency Outcome 1 were rated as areas needing improvement. Reviewers determined that the State was not consistently effective in (1) preventing children's re-entry into foster care (item 5), (2) ensuring children's placement stability while in foster care (item 6), (3) establishing appropriate permanency goals in a timely manner (item 7), and (4) making reasonable efforts to achieve children's permanency goals in a timely manner (items 8, 9, 10).

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

Item 5. Foster Care Re-entries

Strength Area Needing Improvement

Review Findings: Of the 40 foster care cases reviewed, 14 were applicable for an assessment of foster care re-entries because they involved children who entered foster care during the period under review. In assessing this item, reviewers determined whether entry into foster care during the period under review occurred within 12 months of discharge from a prior foster care episode. The assessment results in the following findings:

- Item 5 was rated as a strength in 8 (57 percent) of the 14 applicable cases.
- Item 5 was rated as an area needing improvement in 6 (43 percent) of the 14 applicable cases.

Item 5 was rated as a strength in 8 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 foster care episode. The item was rated as an area needing improvement in 6 cases because the child had one or more entries into foster care during the period under review that occurred within 12 months of a prior episode. It should be noted that for all 6 cases rated as areas needing improvement, the children re-entered care within 3–6 months of discharge from care.

Continued

Example/Excerpt From a Final Report (continued)

Stakeholders commenting on the issue of foster care re-entry were in general agreement that the State does not provide sufficient services to families after reunification. Although the aftercare services tend to be community based and culturally relevant, the services are available only for a limited time. In addition, families residing in rural areas have fewer options for services. Some stakeholders reported that there is a lack of sufficient safety assessments conducted at the time of reunification and at the point of case closure.

Determination and Discussion: Item 5 was assigned an overall rating of area needing improvement on the basis of the following:

- In 43 percent of the applicable cases reviewed, children entering foster care were re-entering within 12 months of discharge from a prior foster care episode.
- The data from the State data profile indicate that the State's data indicator relating to timeliness and permanency of reunification for FY 2006 (20 percent) did not meet the national standard.

According to the Statewide Assessment, State policy does not require the agency to provide post-reunification services beyond 3 months. The State provided data that shows that most cases are closed within 60 days of reunification. The Statewide Assessment also indicated that there is not a strong array of post-reunification services available; funding is scarce and is mostly targeted to the urban areas of the State.

C. Procedures for Preparing the Final Report

The Children's Bureau Central Office staff and contractor work with the Children's Bureau Regional Office, Children's Bureau, and NRT Team Leader to prepare the Final Report, and the Children's Bureau Regional Office distributes the report once it has been reviewed and finalized. The following are the procedures and timeframes for writing the report:

- At the end of the onsite review, the Children's Bureau downloads the Onsite Review Instruments, Stakeholder Interview Guides, and other relevant reports from the CFSR Data Management System. The Children's Bureau Regional Office also should download and keep copies of the relevant documents. The Child Welfare Review Projects maintain the database of all review findings, reports of which are made available to the Children's Bureau Regional Office at its request.
- Within approximately 2 weeks after the onsite review, the Children's Bureau contractor reviews and revises, as needed, the initial draft of the Final Report and sends it to the Children's Bureau Regional Office, other Children's Bureau staff, and NRT Team Leader.
- The Children's Bureau Regional Office, Children's Bureau, and NRT Team Leader review the initial draft of the report and provide comments to the Children's Bureau contractor to be incorporated into the final draft. Any of these

parties may request and arrange a conference call, as needed, to discuss the initial draft or their comments. The Children’s Bureau Regional Office, in collaboration with the NRT Team Leader, finalizes the ratings for the outcomes and systemic factors on the basis of the report content.

- The Children’s Bureau contractor addresses comments from the Children’s Bureau Regional Office, Children’s Bureau staff, and NRT Team Leader; prepares the executive summary and final version of the report; and transmits it to the Children’s Bureau Regional Office, Children’s Bureau staff, and NRT Team Leader.
- The NRT Team Leader forwards the report to key Children’s Bureau Central and Regional Office and Administration on Children, Youth and Families (ACYF) staff for review and comment. Once these key staff return their comments to the NRT Team Leader, the NRT Team Leader then forwards them to the Children’s Bureau Regional Office. The Children’s Bureau Regional Office revises the report as needed, on the basis of internal Children’s Bureau comments.
- The Children’s Bureau Regional Office releases a courtesy copy of the report to the State within 30 days after the onsite review. The courtesy copy of the report is a final draft that provides advance notice to the State of the review findings before the findings are made public and serves as the written notice to the State of the determination of substantial conformity. The courtesy copy is not intended as an opportunity for the State to review and comment on the review findings in the report. Rather, the State’s task is to review the courtesy copy for factual accuracy on the content and technical accuracy regarding how the State program operates.
- If the State identifies issues that require revision of the Final Report, it must notify the Children’s Bureau Regional Office in writing within 2 weeks of receiving the courtesy copy.
- The Children’s Bureau Regional Office reviews the State’s proposed changes and makes any needed factual corrections to the report in response to State comments that are received within the 2-week comment period.
- While the report is being finalized by the Children’s Bureau Regional Office for distribution, the State implements its plan for sharing information about the review findings if it has not done so already. (In the experience of the Children’s Bureau, States benefit from a proactive approach to sharing information about the reviews.)
- Approximately 2 weeks after the Children’s Bureau Regional Office sends the courtesy copy of the report to the State, the Children’s Bureau Regional Office issues the official Final Report, with a cover letter to the State. (See section D below regarding the report’s distribution.)

A State may request copies of the completed Onsite Review Instruments following the onsite review. If requested by the State, the Children’s Bureau Regional Office will download copies of the instruments from the database, but should:

- Release copies of the Onsite Review Instruments and, upon request, printouts from the database maintained by the Child Welfare Review Projects, only after the Final Report has been issued; Stakeholder Interview Guides may not be released
- Before releasing copies of the instruments, remove all confidential identifying information (case identifiers and names) from the Onsite Review Instruments

The Children’s Bureau contractor promptly notifies the Children’s Bureau Regional Office, Children’s Bureau, and NRT Team Leader if there are discrepancies between information in the Statewide Assessment and the onsite review findings that must be resolved. (See chapter 5, section C, for information on resolving discrepancies.) The Children’s Bureau Regional Office notifies the State in writing of any discrepancies, if applicable, within 30 days following the onsite review. The Children’s Bureau Regional Office subsequently incorporates into the report information obtained that resolves the discrepancy and releases a courtesy copy of the report within 30 days following resolution of the discrepancy.

D. Distribution of the Final Report

The Children’s Bureau Regional Office sends a hard copy of the Final Report and a cover letter from the Children’s Bureau Deputy Associate Commissioner, by certified mail, return receipt requested, to the State child welfare director (or to a higher level official, with a copy to the director). The Children’s Bureau Regional Office also sends hard copies of the report and cover letter to the following parties:

- Director, Office of Regional Operations, ACF
- Regional Administrator, ACF
- Commissioner, ACYF
- Associate Commissioner, Children’s Bureau
- Director, Office of Public Affairs, ACF
- Deputy Assistant Secretary for Policy and External Affairs, ACF

Simultaneously, the Children's Bureau Regional Office sends electronic copies of the Final Report to the following parties:

- State Team Leader
- NRT Team Leader
- CFSR Manager, Children's Bureau
- Child Welfare Review Projects (cw@jbsinternational.com)
- National Clearinghouse on Child Abuse and Neglect Information (nccanch@calib.com)

The State distributes copies to State members of the review team and makes the results of the review available to the public, in accordance with Federal requirements. The Children's Bureau also publishes information pertaining to the reviews, including copies of officially released Final Reports, on its Web site and through other information outlets, as appropriate.

The State then uses the Final Report in developing its PIP. The PIP must address any outcomes or systemic factors that are not in substantial conformity and their associated items. (See chapter 7 for more information on the PIP process.)

E. Calculation of Penalty Estimates

In accordance with 45 Code of Federal Regulations (CFR) §1355.36, Federal funds are to be withheld because of failure to achieve substantial conformity or failure to submit or successfully complete a PIP. The Children's Bureau Regional Office uses the Crystal Reports software in the Grants Administration, Tracking and Evaluation System (GATES) to calculate penalty estimates. The penalty estimates are noted in the letter accompanying the Final Report to the State.

Chapter 7

Program Improvement Plans

Creating positive change in child welfare systems is the ultimate goal of the Child and Family Services Reviews (CFSRs). During the two phases of the review process, the Federal and State Governments work in collaboration to assess how well State child welfare agency strategies are achieving positive outcomes for children and families. States then develop a Program Improvement Plan (PIP) to address areas in which they were found to be out of conformity with any one of the seven outcomes or seven systemic factors under review.

The PIP planning and implementation process is perhaps the most important component of the CFSR. It is intended to be an extension of the collaborative planning process that States use to develop the 5-year Child and Family Services Plan (CFSP). State child welfare agencies involve their staff and external partners in assessing the CFSR findings and then preparing, implementing, and evaluating the PIP. Through the PIP process, State agencies also can build their capacity to conduct continuous quality improvement activities.

This chapter provides information on the timeframe for developing the PIP, requirements and content of the PIP, measures of progress used in the PIP, strategies for creating the PIP, available technical assistance (TA), the PIP format, and the PIP approval, reporting, evaluation, and renegotiation procedures.

A. Timeframe for Developing the PIP

The PIP planning and implementation process officially begins after the onsite review is completed. At the statewide exit conference, the National Review Team (NRT) Team Leader verbally provides to the State a preliminary report on the review findings; the Children's Bureau Regional Office then provides a written Final Report on the review findings to the State within 30 days of completion of the onsite review, or within 30 days of resolving discrepancies that occur in the review findings. (See chapter 4, section F, for information on the exit conference; chapter 5, section C, for information on resolving discrepancies; and chapter 6 for information on the preparation and distribution of the Final Report.) The State then prepares the PIP and submits it to the Children's Bureau Regional Office for approval.

It is recommended, however, that the State begin the PIP planning process during the Statewide Assessment phase of the CFSR. To that end, a State should select individuals

to serve on its PIP Development Team when comprising its Statewide Assessment and Onsite Review Teams. (See chapter 2, section D, regarding the composition of the PIP Development Team.) Through the Statewide Assessment process, the State identifies the child welfare agency's areas of strength and those needing improvement. By starting the PIP planning process at this stage in the CFSR, the State agency can connect this process to other statewide program improvement efforts, determine how best to engage its staff and external partners in building on the State's strengths and addressing areas needing improvement, and increase the amount of time available to develop the PIP.

Through the Statewide Assessment process, therefore, a State can accomplish two purposes: (1) exploring the agency's effectiveness in achieving positive outcomes for children and families and in operating its programs and (2) beginning to develop strategies for improvement to be included in the PIP. During the Statewide Assessment process, for example, a State can:

- Engage its external partners in understanding the issues under review and help to build their commitment to participate in the latter phases of the review
- Begin to identify areas where improvements are likely to be needed
- Analyze the underlying factors that affect the State's performance on the outcomes, indicators, and systemic factors
- Explore within the agency and with external partners possible strategies for making needed improvements

By initiating PIP development during the Statewide Assessment process, a State can reduce the amount of planning time needed to develop the PIP after the onsite review by beginning to address those areas that appear to need improvement. Once the State receives the courtesy copy of the Final Report after the onsite review, therefore, it will be well positioned to address any outcome or systemic factor identified as an area needing improvement during the onsite review. (See chapter 6, section C, for information about the courtesy copy of the Final Report.) This ensures that the PIP process will be a time for action rather than for further study or planning.

The following timeframes apply to the PIP development and implementation process:

- The State must submit the PIP to the Children's Bureau Regional Office for approval within 90 calendar days from the date that the State receives written notification from the Children's Bureau Regional Office that it is not operating in substantial conformity with any one of the seven outcomes or seven systemic factors (45 Code of Federal Regulations [CFR] §1355.35[c][1]). In an effort to meet the regulatory timeframes for notifying States of their conformity and still allow States 2 weeks to review the report, the issuance of a courtesy copy of the Final Report serves as the official notice of conformity and begins the 90-day period for submitting the PIP to the Children's Bureau Regional Office.

- There is no regulatory timeframe within which the Children’s Bureau Regional Office must review and approve the PIP. The Children’s Bureau Regional Office and the State should work together during the PIP development process to produce a draft PIP within 90 days that allows the Children’s Bureau Regional Office and the Children’s Bureau to easily review it within 30 days. The Children’s Bureau Regional Office reviews the PIP in consultation with the Children’s Bureau Central Office.
- If the PIP is not approved, the State must submit a revised PIP to the Children’s Bureau Regional Office within 30 calendar days of receiving written notice from the Regional Office that it was not approved (45 CFR §1355.35[c][3]).
- The timeframe for completing the implementation of the PIP may not exceed 2 years from the date that the PIP is approved by the Children’s Bureau Regional Office. Not all PIP elements may require this length of time to address, and the 2 years is, therefore, an outside time limit for those elements requiring more extensive planning and action (45 CFR §1355.35[d][1]).
- Issues affecting child safety must be addressed first and in less than 2 years (45 CFR §1355.35[d][2]). The priority given to safety should be reflected in both the level of effort and the timeframe for implementing the safety provisions of the PIP.
- Although extensions to the 2-year timeframe for completing the PIP are rarely granted, there may be circumstances in which extensions, not to exceed 1 year, may be approved. States should link requests for extensions to specific PIP strategies requiring additional time and must submit these to the Children’s Bureau Regional Office in writing, with supporting documentation, at least 60 days before the approved PIP implementation completion date. The Secretary of the U.S. Department of Health and Human Services (HHS) must approve requests for extensions, which are granted only in exceptional situations (45 CFR §1355.35[d][3]).

B. Requirements and Content of the PIP

The PIP planning process provides an opportunity for State child welfare agencies to develop a plan of action for making both the short-term and long-term changes to their child welfare system necessary to improve outcomes for children and families. The PIP should provide measurable action steps toward improvement, not simply suggest further study of issues identified through the CFSR. States can use the review process (Statewide Assessment and onsite review) to study what works and what needs improvement, and then use the PIP process to implement new strategies for making improvements.

The PIP document should provide sufficient detail and context to ensure that the Children’s Bureau Regional Office and State agency staff can work in partnership to monitor progress in implementing and completing the PIP. Once the goals and action

steps are outlined, the State establishes benchmarks to measure progress toward the goals. The following information is required content in the PIP:

- For each outcome and systemic factor found not to be in substantial conformity, the PIP must include a measurable goal of improvement, action steps, and a timeframe for achieving the goal and implementing the action steps (45 CFR §1355.35[a][1][iii]). Specifically, the PIP should address the following:
 - The items and data indicators that contributed to a determination of “not in substantial conformity” for each outcome, as noted in the Final Report.
 - The CFSP requirements/indicators that contributed to a determination of “not in substantial conformity” for each systemic factor, as noted in the Final Report. The PIP should address the findings of the Final Report regarding the requirements/indicators in determining the steps necessary to make needed improvements.
- The PIP must address particularly egregious areas of nonconformity impacting child safety first (45 CFR §1355.35[d][2]). For the safety items, the State should establish both short-term goals (to minimize the negative effects on children and families immediately) and long-term goals (plans for lasting reforms). The priority assigned to these issues should be reflected in the timeframes and content of the PIP, rather than in the order in which they are identified in the PIP document.

Moreover, not every area of nonconformity requires the same level of effort through the PIP. In addition to addressing immediate safety requirements, the State should give highest priority to addressing areas of performance most significantly out of substantial conformity.

- The PIP must include benchmarks of progress toward achieving the broader goals of the plan. Benchmarks are not only a regulatory requirement (45 CFR §1355.35[a][1][v]), but are interim measures of progress that enable a State to determine whether it is on track to meet its negotiated rate of improvement. Using benchmarks enables the State and the Children’s Bureau Regional Office to measure progress and to assess the effectiveness of the State’s strategies for program improvement. A State therefore can determine, early in the PIP process, whether it is using a strategy that is not leading to improvements, as outlined in the PIP goals. Through ongoing PIP analysis, using the benchmarks, a State can work with the Children’s Bureau Regional Office to make midcourse corrections or adjustments, as needed.
- The PIP must include a specific percentage of improvement (goal) that will be achieved through the PIP for each applicable data indicator that does not meet the national standards (45 CFR §1355.35[a][1][iv]). In some cases, the amount of progress projected to be achieved through the PIP will result in the State not reaching the established national standards. In those cases, the amount of progress

negotiated between the Children’s Bureau Regional Office and the State should be significant enough to move the State toward conformance with the national standards in a reasonable period. In addition, when possible, the PIP should include interim benchmarks (for example, percentages of improvement toward the overall benchmark).

When a State does not meet the national standards, the Children’s Bureau expects that the State, through its PIP, will achieve a negotiated improvement rate that is at least within the “sampling error” identified for the national standards. The Children’s Bureau Regional Office is encouraged to consider other programmatic factors in negotiating the amount of improvement outside the sampling error that a State is required to make in a PIP, including: (1) the extent to which the State’s data fall below or exceed the national standard, (2) the factors affecting the State’s lack of substantial conformity, (3) the difficulty and time involved in program improvement efforts to achieve overall improvement, (4) whether the area needing improvement affects child safety, and (5) the amount of performance improvement the State already may have achieved subsequent to generating the original data profiles used in the reviews.

To assist the Children’s Bureau Regional Office and State in negotiating the amount of improvement to be made with respect to the data indicators, the Children’s Bureau prepares an updated data profile at the time the State is developing its PIP. The updated profile, which provides the most recent data available on the State’s performance, may serve as the basis for negotiating improvements. In situations in which the updated profile indicates that the State’s performance remains below the national standards, actions to improve the data indicators are required in the PIP. If a State’s updated data profile reflects achievement of a previously unmet national standard, and the item was found to be a strength during the onsite review, the State is not required to address this data indicator in the PIP.

- The PIP should identify the individual(s) responsible for undertaking each action step. (This is not a regulatory requirement, but should be done when possible to assist in ensuring successful completion of the PIP.)
- The PIP should specify the geographic areas of the State in which the action steps will be undertaken and explain how the plan will lead to positive outcomes and adequate functioning of the systemic factors statewide, if needed. Because the State’s largest metropolitan subdivision is always a site for the onsite review, the State needs to ensure that plans for improvement include the largest metropolitan subdivision, as needed. (This is not a regulatory requirement, but should be done when possible to ensure that the requirements subject to review are in place throughout the State.)
- The PIP must describe how the State will evaluate and report PIP progress to the Children’s Bureau Regional Office (45 CFR §1355.35[e][1]), including a schedule for submitting progress reports to the Children’s Bureau Regional

Office. The evaluation plan must address how the State will evaluate benchmarks of progress as well as determine whether PIP goals have been achieved. (See section C below for information on measuring progress.)

- The PIP must describe the State’s plan for using Federal or non-Federal sources of TA to support program improvements for each outcome and systemic factor found not to be in substantial conformity (45 CFR §1355.35[a][1][vii]). (See section E below for information on obtaining TA.)
- The State must incorporate elements of the PIP into the goals and objectives of the CFSP and address its progress in implementing the PIP in the Annual Progress and Services Report (APSR) (45 CFR §1355.35[f]) and the CFSP.

In addition to the required elements of the PIP described above, the following general guidelines apply to the PIP content:

- In developing the PIP, the State should set realistic goals that are achievable during the PIP timeframes. While the Children’s Bureau expects that the PIP will be part of a broader plan that a State has for making long-range improvements, the provisions of the PIP should focus on areas in which goals are achievable within the PIP timeframes. In setting goals, the Children’s Bureau Regional Office and State should work together to determine accurate baselines for the areas in which progress is to be made. For example, data profiles updated at the time the State is developing its PIP may serve as baselines for improvements in the data indicators. Generally, the findings of the CFPSR will provide baselines for qualitative review activities. The State may use another type of review to measure progress on items that are not linked to the six national standards. The Children’s Bureau Regional Office and State should ensure that the method used to establish the baseline corresponds with the strategy by which progress will be measured.
- In general, the Children’s Bureau will not accept PIPs with a primary focus on further study of issues or planning. Instead, the PIP should be designed to lead to measurable changes in the outcomes and systemic factors subject to review and should include specific action steps that will lead to those changes.
- The State should consider carefully whether the strategies it includes in the PIP are likely to lead to the desired outcomes and goals. The review may show, for example, that a State is not performing well with regard to conducting comprehensive needs assessments of children and families during the case planning process. The State then might propose to take the following steps: (1) develop a formal comprehensive needs assessment process, (2) train State agency staff on the new needs assessment process, and (3) establish a formal review process to examine regularly whether the new needs assessment process accurately identifies the needs of children and families and links them to the services they require.

- In most situations, the PIP should address improvements in the day-to-day practice of child welfare, rather than focusing strictly on new policies and procedures. By focusing on casework practice at the local level, the State is most likely to link its goals, vision, policies, and procedures to the actual interactions that occur between the child welfare agency and the children and families it serves. This integration of policy and practice with day-to-day casework in the field allows the State to achieve lasting improvements in child welfare. The PIP also should focus on how the State will ensure that the changes in practice indeed are occurring.

In developing strategies that affect front-line practice, the State should be guided by the principles of family-centered practice, community-based services, individualizing services that address the unique needs of children and families, and strengthening parents' capacity to protect and provide for their children. In some situations, a State may need to revise its policies and procedures to strengthen the focus on these principles. In other situations, the State may have adequate policies; and will need to emphasize making practice consistent with those policies. In either case, the PIP should identify correctly where improvements are needed to ensure that casework practice supports timely and positive outcomes for children and families.

States can use Appendix I, PIP Content Checklist, in evaluating the content of the PIP with regard to regulatory requirements and the goal of creating systemic changes.

C. Measurement of PIP Progress

The approach that States take in measuring their progress in implementing the PIP is very important to their success in achieving the goals of the PIP and to improving performance on subsequent CFSRs.

The PIP should include provisions for evaluating progress toward overall goal achievement at the end of the PIP implementation period. For each systemic factor and outcome found not to be in substantial conformity, the PIP must include a provision for determining whether the State has reached the goals stated in the PIP. The measurement provisions constitute evidence that the Children's Bureau Regional Office and the State use to determine whether the State has reached the goals of the PIP and whether the Children's Bureau rescinds penalties or begins withholding funds associated with each outcome or systemic factor not in substantial conformity.

If data are to be used to evaluate the State's success in reaching agreed-upon levels of improvement, for example, the PIP should specify the data to be used, the periods covered by the data, and the specific percentages of improvement to be achieved. If qualitative case reviews are used to evaluate progress, the PIP should include specific information about the review process used and the level of achievement that will be considered as meeting the State's agreed-upon goals in the PIP. If process measures are to be used to evaluate the achievement of the PIP's goals, the specific work products or

implementation processes that constitute the completion of those processes should be specified in the PIP.

In addition to provisions for measuring achievement of the PIP's goals, the PIP should include provisions for measuring progress toward the identified benchmarks. Establishing measurable benchmarks of progress is the first step in evaluating progress periodically.

Benchmarks may be quantitative or process oriented, depending upon the outcome or systemic factor to which they are tied. For example, if a State has a goal of achieving a 5-percent increase in a data indicator during a 2-year PIP, it might establish quantitative benchmarks of 1 percent in the first 6 months, 2.5 percent after the first year, and so on until it reaches the 5-percent overall goal. For process-oriented benchmarks, a State may have an overall goal of training its entire child welfare staff in risk assessment procedures by the end of the first year of its PIP. Benchmarks of progress could include holding the first training by the end of the second month of the PIP, training 50 percent of the staff by the end of the seventh month of the PIP, and so on.

Some outcomes and benchmarks are better captured through quantitative measures, such as data indicators, while others may be better measured by looking at the accomplishment of key steps. In most situations, a mix of measures that inform the State about both its process for implementing changes and the effectiveness of those changes will best serve the State in making desired improvements. As much as possible, however, a State should attempt to establish outcome-oriented measures of effectiveness, such as examining data reports for movement in the data indicators or reviewing for the quality of work at periodic intervals, rather than relying simply on process measures, such as writing and issuing policy, conducting a training session, or developing a new procedure. States should note that process-oriented benchmarks enable them to track implementation of the strategies only, not their effectiveness. Subsequent CFSRs will evaluate the effectiveness of the State's efforts by reviewing for outcome achievement. A State that already has or can develop the capacity to review for effectiveness, such as through the use of a qualitative case review system or examination of outcome-based data, will be better positioned to evaluate its progress in improving outcomes for children and families.

If a State chooses to adopt a qualitative review process, similar to the CFSR, to evaluate progress through the PIP, it is important to plan and specify in the PIP exactly how that process will be used to evaluate performance and determine whether benchmarks and goals are being achieved. Including the following information in the PIP will help the Children's Bureau Regional Office and State evaluate this measurement approach:

- How will baselines be established?
- When, where, and at what intervals will the reviews be conducted?
- Who will conduct the reviews?
- How many cases will the reviews comprise, and how will they be selected?

- How do the State’s review procedures and criteria relate to the CFSR?
- What level of improvement, as evidenced by the case reviews, will establish that the State has met its PIP goal(s)?
- Is a sustainability period associated with establishing that the State has met its goal(s)? (For example, to ensure that improvements are sustained over time, a State might designate that the desired percentage of acceptable case reviews must be achieved and maintained for a specified period.)
- With regard to other measures of progress, such as data, the State should be as specific as possible in the PIP about the source of data to be used, the intervals at which it will be collected, data definitions if they do not correspond to those used in the CFSR, and the timeframes covered by the data.

D. Strategies for Developing the PIP

States should use the experience of participating in the CFSR to develop the PIP by focusing on what was learned through the Statewide Assessment, confirming areas of strength and those needing improvement during the onsite review, and creating a PIP that is based on the results outlined in the Final Report. Through each of these phases, States should engage as many partners in the process as possible, including the courts, tribal representatives, educational administrators, health and mental health service providers, law enforcement personnel, administrative review bodies, caseworkers, parents, foster parents, and children and youth.

Most important, the State should work in collaboration with their Children’s Bureau Regional Office during the entire PIP development and implementation process. The Children’s Bureau Regional Office can support the State in the following ways:

- Ensuring that State leadership is involved in the PIP process and understands the importance of establishing a vision and providing direction to staff assigned to PIP development
- Participating in preliminary planning meetings with the State to discuss the Final Report and assist the State in exploring effective program improvement strategies
- Participating, as appropriate, in ongoing PIP strategy discussions through written correspondence, conference calls, and onsite visits when possible
- Providing insights from, and guidance about, other States’ experiences with the PIP development and implementation process, and facilitating links to representatives of other States who have developed a PIP
- Negotiating levels of improvement, and providing guidance about acceptable indicators (measures) of improvement

- Linking the State early in the planning process to TA needed during the PIP development and implementation process
- Reviewing and commenting on drafts of the PIP in a timely manner
- Coordinating Federal staff review and approval of the PIP within the Children's Bureau Regional Office and with the NRT Team Leader for each State

The State should use the following strategies for developing the PIP:

- Begin the PIP development process while completing the Statewide Assessment. This allows the State and its external partners to identify issues and potential underlying causes and begin exploring strategies for making improvements.
- Ensure that leadership in the State is involved in setting the vision and direction of the PIP and is actively engaged in oversight of the PIP's development.
- Examine the State's data in relation to programs and practice. State staff and external partners should look at the policy and practice issues behind the data and try to determine the factors influencing the State's performance in the various areas addressed by the data. (TA in reviewing State data and practice issues is available through the National Resource Centers [NRCs] funded by the Children's Bureau; see section E below for more information on TA resources.)

Instead of focusing solely on statewide data, it is also beneficial for a State to analyze its data by county or region; a data syntax for the safety and permanency profile (Data Profile Programming Logic), and support in analyzing the syntax, is available on the Children's Bureau Web site at www.acf.hhs.gov/programs/cb. This data analysis process can be useful in exploring which jurisdictions within a State are experiencing specific challenges.

- Help all involved parties to view the PIP as a process designed to create lasting and statewide systemic change while also addressing the immediate needs of children and families.
- Use information from the Statewide Assessment and the Final Report to:
 - Identify the items, data indicators, and CFSP requirements that contributed to outcomes or systemic factors being rated out of substantial conformity.
 - Review how the systemic factors affect the outcomes, and examine relationships between other areas determined to need improvement.
 - Identify cross-cutting themes and issues that affect multiple areas of the State's performance; for example, the effects of inadequate assessments on safety, permanency, and child and family well-being outcomes.

- Identify the communities, jurisdictions, or regions that might particularly benefit from program improvement activities for each outcome or systemic factor.
 - Develop a list of questions that might be used during focus groups or other consultation activities with agency staff and external partners during the PIP planning process.
 - Analyze each area needing improvement to identify underlying issues that affect the State’s performance; for example, how the quality and content of staff training affects staff’s ability to effectively engage parents in the case-planning process.
 - Identify strengths or promising practices that can be used to develop strategies for making improvements. For example, an initiative or project that leads to improved case planning in one area of the State might be implemented in other jurisdictions.
- Develop a plan for distributing information from the Final Report to facilitate a clear understanding of the findings and to encourage input on the PIP, using strategies such as:
 - Sharing key information with elected officials through briefings, with providers through focus groups, and with community members through public forums.
 - Hosting a press conference (and/or prepare and distribute press releases) to explain the review findings to the media, and designate a person or unit to respond appropriately to questions about the findings.
 - Placing the Final Report or information about the results of the review on the State agency’s Web site.
 - Develop vehicles for engaging all appropriate parties in the PIP development, implementation, and evaluation process, including:
 - Establishing a plan for maintaining ongoing communication with the Children’s Bureau Regional Office staff and the PIP Development Team during PIP development, implementation, and evaluation. Consider providing drafts (or sections) of the PIP to the Children’s Bureau Regional Office or members of the Statewide Assessment or Onsite Review Teams to elicit feedback that will enable the State to make adjustments, as necessary, early in the process.
 - Engaging the Statewide Assessment Team and State members of the Onsite Review Team (as well as others, as appropriate) in the process of developing the PIP. The State agency might designate subgroups of this team to

formulate strategies for addressing outcomes and systemic factors that were found to be out of conformity or to prepare different sections of the PIP.

- Incorporating the PIP development process into the State’s collaborative planning process for developing the CFSP and the APSR by involving members of the CFSP planning group and linking improvements to the goals and strategies outlined in the CFSP. The Program Instruction ACYF-CB-PI-02-05 provides guidance on how the content of the PIP should be incorporated into the CFSP and APSR and is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.
 - When appropriate, incorporating consent decree requirements, strategies, and plans into the PIP so that the State is not working on two separate plans.
 - Soliciting the input of agency staff, child welfare service providers, youth served in foster care, professionals in related fields, and community members on potential strategies for making systemic improvements, specifically in relation to areas contributing to the State’s nonconformance.
 - Scheduling a meeting with staff from the three local review sites that participated in the onsite review, and soliciting input about how to make improvements.
 - Exploring ways to link PIP efforts to existing, related initiatives of the State agency, localities within the State, community groups, advocacy organizations, courts, and constituency groups (for example, an association of local child welfare agency directors), thereby increasing support for the PIP process and ensuring sustainable capacity building.
 - Developing or strengthening partnerships with existing organizations or appointed task forces or councils that have goals similar to those outlined in the PIP (for example, joining forces with a Governor’s council on Hispanic affairs to recruit Hispanic foster families).
 - Engaging other key external players in developing critical sections of the PIP, especially when their work affects the child welfare agency’s efforts to protect and support children (for example, the courts or other State agencies, such as Medicaid and mental health, with overlapping service populations). This is particularly helpful in ensuring support for changes that may need to be implemented by those outside the child welfare agency.
- Create a process for ensuring that program improvements are made in a manner that leads to positive outcomes and adequate functioning of the systemic factors statewide, and not just in the three review sites.

- Ensure that the data the State uses provide accurate representations of practice in the State and will serve as valid measures of the progress of PIP implementation and effectiveness.
- Provide ample time to achieve each goal (and the associated action steps) in the PIP, particularly those that require complex strategies for achieving improvement.
- Use the PIP development process to enhance the State’s quality assurance process so that new gains achieved through the PIP are sustained over time and the State operates in a continuous quality improvement environment.

E. Technical Assistance (TA) on the PIP

TA is available to States during all phases of the CFSR, including PIP development and implementation. States should assess their TA needs for developing and implementing the PIP before the start of the Statewide Assessment and continue to do so throughout the PIP process. States also should work with their Children’s Bureau Regional Office, which is responsible for the coordination of Children’s Bureau-funded TA, to determine the most appropriate TA sources.

The Children’s Bureau-funded NRCs offer TA related to the CFSR and can provide TA to States during the PIP development and implementation process. For more information on the NRCs, see the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.

States also are encouraged to seek assistance that will promote stronger relationships with State or locally based TA providers and that will build statewide capacity in the areas of child welfare and protection.

F. PIP Format

The Children’s Bureau has developed a standard format that States can use to prepare the PIP for submission to the Children’s Bureau Regional Office. (The standard format, which is outlined in Information Memorandum ACYF-CB-IM-02-04, is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.) States are strongly encouraged to use this format to facilitate ease of review, approval, and tracking of the PIPs. States choosing to use a different format for preparing the PIP must include all of the information required in 45 CFR §1355.35.

The PIP standard format contains the following sections:

- **PIP General Information:** The State should provide general contact information for State agency personnel responsible for the CFSR (and for PIP development and monitoring, if different).
- **PIP Workplan and Matrix Instructions:** The State should develop the workplan in preparing its PIP. The workplan provides space for details about the outcomes and/or the systemic factors to be improved, the action strategy for doing so, the

people to be involved in or responsible for each strategy, and how each strategy will be measured (PIP evaluation).

The State should summarize the information from the workplan into the PIP Matrix, designed by the Children's Bureau, which the Children's Bureau Regional Office uses to track PIP progress. The State is encouraged to use the PIP Matrix to report on PIP progress by noting the dates of achievement of benchmarks and goals. When benchmarks and goals are not met, the State can provide a narrative explanation at the end of the PIP Matrix.

- PIP Agreement Form (approvals and signatures): The chief executive officer of the State child welfare agency and the Regional Administrator for the Children's Bureau Regional Office responsible for the State must approve the PIP.

G. PIP Approval

Upon completing the PIP, the State submits it electronically to the Children's Bureau Regional Office. Before approving the PIP, the Children's Bureau Regional Office submits a copy to the Children's Bureau Central Office.

Both the Children's Bureau Regional Office staff and the State child welfare agency can use Appendix I, CFSR PIP Content Checklist, to ensure that the PIP requirements are met and that the PIP will be a useful tool in making improvements in policies and practice that will yield better outcomes for children and families.

The Children's Bureau Regional Office, in consultation with the Children's Bureau Central Office, reviews the PIP and provides approval in writing (or electronically) to the State. A PIP is approved if it meets the guidelines specified in 45 CFR §1355.35(a).

In the event that the Children's Bureau Regional Office and the State cannot reach consensus regarding the content of the PIP or the degree to which program or data improvements are to be achieved, the Children's Bureau retains the authority to assign the contents of the plan and/or the degree of improvement required for it to be considered to have been successfully completed. Under such circumstances, the Children's Bureau Regional Office provides to the State a written rationale for the content and the degree of improvement required.

Upon approving the PIP, in consultation with the Children's Bureau, the Children's Bureau Regional Office submits a copy to the Children's Bureau Central Office, the Child Welfare Review Projects, and the National Clearinghouse on Child Abuse and Neglect Information.

H. PIP Reports

After the PIP is approved, the State is required to submit, to the Children's Bureau Regional Office, status reports (written or electronic) no less frequently than quarterly unless the Children's Bureau Regional Office approves less frequent reporting (45 CFR

§1355.35[d][4]). The status reports must be submitted within agreed-upon timeframes (for example, 30 days after the end of the quarter) and show progress toward the goals established. States are strongly encouraged to use the PIP Matrix to prepare the reports. (The matrix is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.)

The Children’s Bureau Regional Office submits copies of the status reports to the Children’s Bureau Central Office, the Child Welfare Review Projects, and the National Clearinghouse on Child Abuse and Neglect Information.

I. Evaluation of the PIP

The Children’s Bureau Regional Office, in collaboration with the State and in consultation with the Children’s Bureau Central Office, evaluates the State’s achievements with reference to the terms and conditions of the approved PIP as follows:

- The Children’s Bureau Regional Office monitors the State’s progress in completing the provisions of the PIP through the PIP status reports that the State must submit. The Children’s Bureau Regional Office submits copies of the status reports to the Children’s Bureau Central Office and the Child Welfare Review Projects as they are submitted by the State.
- The status reports should include: (1) a description of progress made during the reporting period and (2) data about measurable factors and their relationship to the established benchmarks and timeframes. (States are strongly encouraged to use the PIP Matrix to prepare the status reports. This is available on the Children’s Bureau Web site at www.acf.hhs.gov/programs/cb.)
- At least annually, the Children’s Bureau Central and Regional Offices and the State must jointly evaluate the State’s progress in implementing the PIP. This activity should occur in conjunction with the preparation of the State’s APSR/CFSP, and in collaboration with other members of the State CFSR team. The evaluation should be based on the evaluation measures and methods specified in the PIP (45 CFR §§1355.35[e], [e][1], and [e][2]).
- Action steps and goals included in the PIP are evaluated according to the methods and completion dates specified in the PIP. The Children’s Bureau Regional Office and State may jointly determine, on the basis of sufficient information, that action steps have been completed and/or goals achieved before the projected completion dates. When that occurs, the Children’s Bureau Regional Office and the State are not required to further evaluate those action steps or goals during the remainder of the PIP implementation process (45 CFR §1355.35[e][3]). The Children’s Bureau Regional Office notifies the State in writing when such determinations are made.

J. Renegotiation of the PIP

In accordance with 45 CFR §1355.35(e)(4), the State may request to renegotiate the PIP with the Children's Bureau Regional Office, as needed, especially when implementing complex strategies. Requests for changes to the PIP should be submitted in writing (or electronically) to the Children's Bureau Regional Office for approval; the Children's Bureau Regional Office Team Leader then contacts the State to discuss the issues leading to the request.

The Children's Bureau Regional Office and State, in consultation with the Children's Bureau Central Office, may renegotiate the PIP, as needed, but the new plan must meet the following criteria:

- The renegotiated PIP is designed to correct the areas of the State's program determined not to be in substantial conformity and/or to achieve a standard for the data indicators that is acceptable (45 CFR §1355.35[e][4][i]).
- The amount of time needed to implement the provisions of the PIP does not extend beyond 3 years from the date of the original PIP approval (the original maximum of 2 years to complete the PIP plus an additional 1 year if the HHS Secretary approves an extension beyond the original 2-year limit) (45 CFR §1355.35[e][4][ii]).
- The terms of the renegotiated PIP are approved by the Children's Bureau Regional Office in consultation with the Children's Bureau Central Office (45 CFR §1355.35[e][4][iii]).

Upon approval of the renegotiated PIP, the Children's Bureau Regional Office submits copies to the Children's Bureau Central Office and the Child Welfare Review Projects.

K. Financial Penalties

The withholding of funds assessed as a financial penalty is suspended while a State is implementing a PIP. If the Children's Bureau Regional Office determines, however, that a State failed to submit status reports, or that a State is not making satisfactory progress toward achieving the goals and action steps in a timely manner, then the suspension of penalties ceases and withholding of funds begins (45 CFR §§1355.36[e][2][i] and [ii]).

As a State completes all requirements of the PIP related to an outcome or systemic factor, the Children's Bureau Regional Office will notify the State that associated penalties are rescinded.