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Ensuring Safe, Nurturing and Permanent Families for Children:
**The Role of Accountability in Child
Welfare Finance Reform**

THIRD IN A SERIES OF FOUR REPORTS ON IMPROVING CHILD WELFARE

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Introduction

This report is one in a series of four Casey Family Programs white papers on improving the child welfare system. The first white paper outlined the need for comprehensive federal child welfare finance reform so that child welfare systems have the flexibility to invest federal funds in ways that better support safety, permanency and improved well-being outcomes¹ for children in their homes and communities.

It follows that if the federal system of child welfare funding is reformed, then the federal system of child welfare accountability also will need to be reconsidered so that the federal government has assurances that the federal funds are being invested effectively to improve the lives of vulnerable children and their families. Casey Family Programs believes that the federal government should restructure both its funding criteria and accountability mechanisms so that the federal government is paying for improved child outcomes rather than the costs of maintaining children in foster care.

This white paper analyzes a possible framework to provide the high level of accountability that the federal government should expect – and that all children deserve.

Founded in 1966, Casey Family Programs is a national operating foundation with a mission to provide and improve – and ultimately prevent the need for – foster care. We believe that all children should enjoy the security and comfort of a safe, nurturing and permanent family to ensure their well-being. Sustained traumatic stress in infancy and early childhood can lead to adverse emotional, developmental and physical health outcomes as these children develop and become adults. We believe that children have the best opportunity for positive social and emotional development when they are in safe, nurturing and permanent families, supported by strong communities.

¹ For the purpose of this paper, the term *outcome* will be defined and used as follows: An end result; for example, conditions of child safety, permanency and well-being.

In the U.S., child welfare is largely the responsibility of state, county and local agencies, with considerable financial support and oversight from the federal government.

The federal government has identified safety, permanency and improved well-being as child welfare goals, and states are held accountable for these goals through the Child and Family Services Reviews (CFSRs). The advent of the CFSRs was instrumental in spurring states to improve their capacity to manage child welfare data and measure outcomes. The process and measures currently used by the CFSRs, however, are generally viewed as portraying an incomplete picture of a state's child welfare performance.

In order for the Administration for Children and Families (ACF) to effectively hold child welfare agencies accountable, it must improve methods of measuring states' achievement of child safety, permanency and well-being outcomes. It is critical to carefully define outcome indicators and measures of critical processes, knowing that required indicators² will shape practice, policy and funding for the entire child welfare system. Accountability should encompass a system of outcomes monitoring, data analysis, program evaluation, evidence-based practices and continuous quality improvement³ with the states and the federal government working together as partners to develop that system.

A new accountability framework should encompass the following purposes:

- Ensure that public child welfare agencies are strongly focused on outcomes and results.
- Reliably and accurately measure progress in achieving critical outcomes.
- Complement quantitative measures with qualitative feedback from children and parents regarding their experiences with child welfare services, and ensure that both quantitative and qualitative data are used to improve outcomes for children.
- Create incentives for states to improve performance on indicators of safety, permanency and well-being.
- Create a flexible system of penalties that enhances an agency's ability to improve outcomes.
- Ensure data integrity in outcome measurements and in other required measurements in the National Child Abuse and Neglect Data System (NCANDS) and the Adoption and Foster Care Analysis and Reporting System (AFCARS).
- Incorporate the perspectives of caseworkers and supervisors in quality improvement processes.
- Bring knowledge to bear on practice through rigorous evaluation of programs and practices and ongoing dissemination of knowledge.

By reforming the current accountability system to reflect these principles, the federal government will help child welfare systems stay focused on the right priorities – and help ensure that all children have safe, nurturing and permanent families.

² For the purpose of this paper, the term *indicator* will be defined and used as follows: Measures that reflect whether and to what extent a system is achieving desired outcomes. One indicator of the outcome “permanency,” for example, is the percentage of children reunified with their birth families who re-enter care within a certain time period.

³ Testa, M., & Poertner, J. (2010). *Fostering accountability: Using evidence to guide and improve child welfare policy*. New York: Oxford University Press.

States and Federal Government as Partners

While state and county governments are responsible for administering the day-to-day work of child protection and child welfare, the federal government plays an important role in funding and overseeing the work of the states. The federal government is responsible for ensuring that federally funded services and programs lead to improved outcomes for children. This can be accomplished by aligning federal funding with desired results so that the federal government is paying for improved child outcomes rather than for the cost of maintaining children in foster care.

Casey Family Programs believes that identified child well-being outcomes should be broadened to include educational, behavioral health, physical health and developmental outcomes — for example, educational stability and academic achievement, and treatment for and recovery from physical and mental health conditions of children who have extensive child welfare system involvement. The challenge for child welfare agencies, which are already held accountable for child well-being, is that these outcomes depend to a large degree on services provided through other systems. There is disagreement in the field about the extent to which child welfare systems should be accountable for well-being outcomes that largely depend on services provided, regulated and paid for by other state or federal systems, such as Medicaid. One way to address the dependence of child welfare agencies on services provided by other organizations is for ACF to play a greater role in promoting cross-system collaboration and developing eligibility rules that give children and families with open child welfare cases ready access to services.

One example of how the federal government is already doing this work effectively is the Family Unification Program (FUP). Through FUP, the U.S. Department of Housing and Urban Development provides housing vouchers to families that have been certified by both a public child welfare agency and a public housing agency. In order to qualify, the public child welfare agency has to certify that “the lack of adequate housing is a primary factor in the imminent placement of the family’s child, or children, in out-of-home care, or in the delay of discharge of a child, or children, to the family from out-of-home care.”⁴ In addition, the public housing agency has to determine that the family is eligible for a housing choice voucher based on the family’s annual gross income. This partnership between the two agencies has enabled many children who would otherwise have been at risk of placement to remain with their families in safe and stable housing, and has also removed housing as a barrier to reunification for those children already in foster care.

Another challenge for child welfare agencies is that although courts make final decisions about the safety, permanency and well-being of children served by the child welfare system, it is the agencies that are ultimately held accountable for the outcomes of these decisions. There is growing recognition in the field that child welfare and the judiciary need to work together to improve system performance and ensure improved outcomes for children, as evidenced by programs such as the federally funded Court Improvement Program. There is still a need for greater collaboration, however, particularly in areas such as data sharing between child welfare agencies and the court system. Courts that have developed data systems to capture outcomes such as length of stay, rates of re-entry into care and completion of permanent plans have found this to be a meaningful way of helping judicial staff and child welfare staff work together to improve outcomes. Consequently, Casey Family Programs believes that the federal government should play a greater role in encouraging the development of data-sharing agreements and agency-court partnerships.

Current System of Child Welfare Accountability

The federal government holds state child welfare agencies accountable for outcomes through the CFSTRs, and for the appropriate use of Title IV-E funds through Title IV-E Eligibility Reviews. Both the CFSTRs and the Title IV-E audits involve periodic site visits from state/federal teams to review a sample of cases. The intent of the CFSTRs is to “enable the Children’s Bureau to:⁵ (1) ensure conformity with Federal child welfare requirements; (2) determine what is actually happening to children and families as they are engaged in child welfare services; and

(3) assist States to enhance their capacity to help children and families achieve positive outcomes.⁶ By general agreement, these outcomes are child safety and permanency, and child and parent well-being. The intent of the Title IV-E Eligibility Reviews is to ensure that states are correctly certifying IV-E eligibility of children, and that all payments for which the states are receiving IV-E reimbursement are in compliance with federal regulations and standards.⁷ Under both of these accountability mechanisms, states that do not meet federal expectations are required to enter into a Program Improvement Plan (PIP) and can be assessed financial penalties by the federal government if they do not achieve the performance targets specified in the PIP.

Prior to the CFSTRs, data measures were managed primarily through NCANDS and AFCARS. Some states had also developed their own accountability mechanisms. For example, Utah developed an intensive qualitative case review process to ensure compliance with their practice model well before CFSTR requirements for case review were implemented. As the CFSTR process has been institutionalized nationally, states have improved their capacity to manage data and improve outcomes. Nevertheless, the measurement of child welfare outcomes is an ongoing learning process. As of September 2010, two rounds of CFSTRs have been completed for all 50 states, Puerto Rico and the District of Columbia, and the planning for round three is currently underway. Casey Family Programs believes that now is the time for an improved accountability system that will spur states on to greater innovation and more effective use of data to achieve improved outcomes.

Flaws in the CFSTR System of Accountability

The goal of the CFSTRs is to help states improve child welfare services and achieve safety, permanency and improved well-being outcomes for families and children who receive services, yet child welfare practitioners and experts question whether the CFSTRs provide an accurate picture of state performance.

The federal government has a legitimate interest in ensuring that federal funds are used effectively to improve child and family outcomes. The challenge is to develop a process that is integrated with and builds upon the work that is already taking place in a state, in a more meaningful way than the current CFSTR process. In addition, states are diverting an inordinate amount of resources to coping with the many requirements of the CFSTR process. The federal government should work toward a less cumbersome process, one that more accurately reflects the safety, permanency and well-being of children in the child welfare system.

States have only been able to measure outcomes using administrative data within the past 10 to 15 years. Therefore, many states and the federal government lack a well-developed expertise in outcome measurement. The current indicators of both outcomes and service delivery are generally viewed as problematic. CFSTR measures were determined based on data available in AFCARS or NCANDS, rather than on an assessment of what measures are needed and development of a system that could capture the necessary data. For example, there is almost no effort to track abuse or neglect rates of children who were found to be non-victims in prior investigations, or those whose cases were “indicated” but received in-home services rather than placement in foster care. There is much more information available about children who are placed in foster care and who eventually exit care than about children who remain in the home, or are returned home after a period of placement, but who are still at risk of child maltreatment.

⁴ U.S. Department of Housing and Urban Development. (2003). Public and Indian housing: Family unification vouchers. Retrieved from HUD website www.hud.gov/offices/pih/programs/hcv/family.cfm

⁵ The Children’s Bureau is one of two bureaus within the Administration on Children, Youth and Families, which is a part of the Administration for Children and Families (ACF).

⁶ Children’s Bureau. (n.d.) Child and Family Services Reviews Fact Sheet. Retrieved from CB website www.acf.hhs.gov/programs/cb/cwmonitoring/recruit/cfsrfactsheet.htm

⁷ For the purpose of this paper, the term *standards* will be defined and used as follows: An expectation considered by an authority or by general agreement as a reasonable basis for accountability and for evaluating performance; for example, under the federal CFSTR requirements, state child welfare systems are expected to score within the 75th percentile on seven data indicators.

Further, the inclusion in the CFSRs of national standards by which to assess state performance is not productive. The federal government has established national standards for performance on a small set of measures that are the same for every state, regardless of demographics, resources, poverty levels and state policies. States are required to attain the 75th percentile on each of these measures. In addition to ignoring state differences, the system creates an environment in which states are inevitably compared to each other, and all but guarantees that most states will not meet the CFSR standards. In fact, no state has yet been found to be in substantial conformity in all of the seven outcome areas or seven systemic factors assessed by the CFSRs.

A focus on any specific set of measures (combined with scoring of states), sanctions or even rewards is likely to encourage creative efforts “to look good at the expense of being good” on standard measures of safety, permanency and well-being. Further, a misplaced emphasis on any single static measure greatly increases the likelihood that agencies will “game” measures, and that data integrity will be severely compromised over time. In addition, the federal government’s insistence that states improve performance on specific measures creates a disincentive for states to improve outcome measurement in innovative areas such as early intervention, family engagement and post-permanency outcomes.

Another common criticism of the CFSRs is the use of sanctions to penalize states that do not achieve negotiated performance targets. The Secretary of Health and Human Services has no authority to tailor or negotiate penalties based on a state’s unique circumstances. As a result, a state that has made a good faith effort but failed to meet performance goals is treated the same as a state that has abandoned its PIP.

Related to the issue of penalties is the dearth of incentives in the current system of accountability and financing. Federal child welfare financing creates “incentives that run contrary to system goals... (and) creates an incentive structure that favors spending on foster care rather than helping children and families attain permanence.”⁸ The primary exception to this system of compensation is the Adoption Incentives Program, which provides incentive payments to states that increase the number of children adopted from the child welfare system. The program has contributed to an increase in the yearly number of foster care adoptions from 37,088 in 1998⁹ to 57,000 in FY 2009.¹⁰ Between 1998 and 2007, states received more than \$222 million in incentive awards.¹¹ Although the Adoption Incentive Program has been a factor contributing to increased adoptions, it is limited to a single child welfare outcome. In contrast, other outcomes – such as safely preventing the need for foster care placement, reduction in rates of maltreatment recurrence, the placement of children in legally secure permanent guardianships, the safe and stable reunification of children with their families, and others – are not rewarded. What is needed is a more balanced array of incentives for those states doing particularly well in areas measured or that have achieved significant gains following the implementation of their PIP, thus rewarding states for improved performance in each of the domains of safety, permanency and well-being.

An Alternative to the Current Accountability System

The development of an improved accountability system, including an effective method of measuring outcomes, will require extensive critical thinking, debate, experimentation and continuous quality improvement.

In place of the current CFSR system, Casey Family Programs suggests a reformed accountability system that rewards innovation, promotes enhanced system capacity, makes greater use of incentives, provides for flexible use of penalties and aligns financing with outcomes.

Casey Family Programs believes that an integral part of federal-state accountability should be a requirement that states demonstrate how they use data to improve child outcomes. But until there is a much improved understanding about how best to measure outcomes across states, we advocate that the federal government work with states to improve outcome indicators, while at the same time offering incentives for states to design their own measures of progress, particularly in the areas of prevention and well-being. Although the

federal government would ultimately design a set of measures grounded in states' experience, states should be allowed the freedom and flexibility to develop their own additional measures, based on their unique communities and needs. For example, some states may choose to develop measures addressing specific populations that are over-represented in their child welfare system, such as American Indian children and compliance with the Indian Child Welfare Act.

Numerous states have already begun to do this work by building strong systems of child welfare accountability to augment and enhance the CFSTRs. For example, Georgia has instituted a comprehensive system of qualitative and quantitative process and outcome tracking, holding weekly meetings of leaders and monthly meetings that bring together hundreds of staff at all levels to monitor performance and identify opportunities for improvement. The director of the child welfare agency receives daily electronic updates on key performance measures.¹² New Jersey has instituted a data fellows program, in which staff compete for 100 slots to be Data Fellows and participate in monthly training around the presentation, analysis and targeted use of data in their work.

During this interim period, states can be evaluated on their own practice improvements as well as their use of data, so that the focus is less on specific measures and more on the use of data to achieve improved outcomes. States should be incentivized to use outcome data to improve their programs and practices. Those that do so successfully should be recognized by ACF and become eligible for "innovative practices" grants. In addition, those states should have the option for a less rigorous or less frequent CFSTR process, so that more federal resources can be focused on states that need more assistance in improving outcomes.

The use of state-specific indicators and measures would, over time, inform a quality improvement process administered jointly by the federal government and states. The interim goal of the process would be to develop a comprehensive knowledge base regarding effective child welfare measures and measurement processes. The ultimate goal would be establishment of a fully longitudinal national foster care database as well as a set of meaningful national measures and indicators that comprehensively assess system performance and achievement of outcomes. These measures would then be a key feature in the system of federal child welfare oversight, taking precedence over state measures developed in the interim.

Further, Casey Family Programs believes that qualitative data, as well as quantitative data, is necessary to better capture the experience of children, parents, relatives and foster parents in the child welfare system. The absence of significant consumer feedback in the current system of accountability reflects the powerlessness of children and families to influence, or even communicate with, the organizations that serve them. Casey Family Programs supports the addition of periodic qualitative evaluations by children, parents, relatives and foster parents who have received child welfare services. In-depth accounts of their experiences would add a vital perspective to the data provided by quantitative measures and would be a critical part of the continuous quality improvement process.

Casey Family Programs supports the adoption of national performance and capacity standards, for both child welfare agencies and dependency courts, that set a minimum expectation for the quality of states' child welfare programs so that state and county systems have the capacity to achieve desired outcomes. Expectations of states' child welfare systems could include some or all of the current seven systemic factors already

⁸ Testa, M., & Poertner, J. (2010). *Fostering accountability: Using evidence to guide and improve child welfare policy*. New York: Oxford University Press, pp. 296-297.

⁹ Children's Bureau. *Adoptions of Children with Public Child Welfare Agency Involvement by State- FY1995- FY1996*. Retrieved from CB website www.acf.hhs.gov/programs/cb/stats_research/afcars/adoptchild06.htm

¹⁰ Children's Bureau (2010). *Trends in Foster Care and Adoption—FY 2002-FY 2009*. Retrieved from CB website www.acf.hhs.gov/programs/cb/stats_research/afcars/trends.htm

¹¹ Children's Bureau. *Cumulative Adoption Incentive Earning History by State*. Retrieved from CB website www.acf.hhs.gov/programs/cb/programs_fund/adopt_incentive_history.htm

¹² For the purpose of this paper, the term *performance* measure will be defined and used as follows: Measures of whether a system is functioning as intended, for example, whether the right services are being delivered to the right people at the right time.

included in the CFSRs, as well as workload standards that all states would be expected to have in place. The service array required by the CFSRs should include substance abuse and mental health treatment for both adults and youth, domestic violence services for both victims and perpetrators, concrete services for low-income families that specifically address how families can be aided to escape poverty, and support services for parents with developmental disabilities. The federal government should encourage strong cross-system collaboration and partnerships in order to provide an effective service array that meets the diverse needs of children and families.

In place of the current system of penalties, Casey Family Programs advocates for adoption of a more flexible approach to penalties, similar to that of the Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp program, which provides food assistance to roughly 40 million people. The federal government pays the full cost of benefits and half of the cost of state program administration, which totaled \$56 billion in FY2009.¹³ SNAP includes a rigorous quality control system that seeks to ensure that applicants are paid the correct amount based on their eligibility status. States with payment error rates that exceed an annually determined national performance measure are assessed penalties based on a statutory formula. The Secretary of Agriculture may: (a) waive all or part of the penalty; (b) require that up to 50 percent be reinvested in program improvements; (c) require that up to 50 percent be set aside for possible later recovery; or (d) take any combination of the foregoing actions. States with error rates of 6 percent or more are required to develop and implement corrective action plans.¹⁴

In addition to negotiated penalties, SNAP includes bonus payments for states that meet criteria for high performance and most improved performance. In June 2010, the Secretary of Agriculture awarded \$30 million to states in the categories of Best Payment Accuracy Rate, Most Improved Payment Accuracy Rate, Best Negative Error Rate and Most Improved Negative Error Rate.¹⁵

SNAP's quality control system has improved program integrity and reduced payment error rates to an all-time low of 4.36 percent. According to the Government Accountability Office, the combination of sanctions and performance bonuses is credited by many as being the single largest motivator of system improvement.¹⁶

Casey Family Programs also advocates for a thoughtful and comprehensive incentive structure. Some states already are choosing to start with clearly defined and measurable outcomes, and then aligning incentives with those outcomes. This form of financial contracting, known as Performance-Based Contracting (PBC), has been explained as: "a form of contract between the government and private sector that exchanges increased performance for the necessary resources and flexibility needed to achieve the higher performance benchmarks. It aligns the financial incentives in the contract with the outcomes the system should achieve on behalf of children and families ... it shifts provider agency accountability from "Did you do what you were told to do?" to "Did what you did work?" and "What difference did it make in the outcomes for children?"¹⁷

This shift in incentives and accountability mechanisms has been credited with improved outcomes in several child welfare jurisdictions that have incorporated PBC as part of their reform efforts, including Illinois and the city/county of Philadelphia. The lessons learned from these jurisdictions could help to inform a new federal accountability framework that incentivizes child safety, permanency and well-being outcomes.

Casey Family Programs supports an improved accountability system that uses financial incentives to improve permanency outcomes. We propose that there should be a specific federal expectation around state and county agencies' achievement of permanency outcomes, and states that exceed expectations should be rewarded. Further, a higher rate of reimbursement should be provided for desired outcomes – for example, safely reunifying children with their families. Also, the federal contribution should diminish over time for less desirable outcomes – for example, lengths of stay in foster care that greatly exceed the timelines outlined in the Adoption and Safe Families Act (ASFA). If penalties must be included in this system, the Secretary of Health and Human Services should have the discretion to negotiate penalty options with jurisdictions that are under-performing, including an option to reinvest penalties into system improvements.

Accountability Should be Proportionate to Level of System Involvement

A child welfare agency's involvement with a child can range from a few minutes to several years. Casey Family Programs believes that the degree to which child welfare agencies are held accountable for child outcomes should correspond to their degree of involvement with that child.

Child welfare agencies take on additional responsibility for the well-being of children who stay in foster care the longest, and whose relationships with their birth families and relatives are significantly or permanently disrupted. As the intensity, duration and frequency of agency interventions increase, child welfare agencies should be held increasingly accountable for ensuring the conditions that promote positive child development. For example, agencies should have greater accountability for providing appropriate educational support services, such as tutoring, to a child who has been in foster care for many months, or even years, vs. a child who has spent a few days or weeks in foster care.

Agencies should have a similarly heightened responsibility for the safety of children who experience substantiated recurrent maltreatment and should be rewarded for offering, providing or funding services to prevent child maltreatment related to substance abuse, child or parent mental health problems, and family violence. Child welfare agencies should be responsible for evaluating whether these services have led to improvements in family functioning. On the other hand, it is not reasonable to hold child welfare agencies accountable for long-term developmental outcomes in cases involving brief safety-oriented in-home services or brief foster care placements.

Accountability at the Caseworker Level Should Include a Focus on Outcomes

The performance of child welfare agencies is driven by the work of caseworkers. Thus, it follows that if the agency is going to be held accountable for outcomes at the system level, then caseworkers and units should be managed toward those outcomes.

In fact, child welfare systems are more often managed through a steadily expanding regulatory framework that sets forth procedures, timeframes, documentation requirements and review processes. Agencies then audit cases for compliance with policies and procedures. Despite the increased emphasis in recent years on measuring outcomes, the accountability system continues to be driven by compliance with procedures and documentation requirements. This approach to accountability at the unit and caseworker level limits discretion and initiative, promotes a risk-averse organizational culture and undermines professional commitment to knowledge-based practice. These management practices encourage caseworkers to look for other careers, and they are contrary to a culture of responsibility and professional growth.

If state and county child welfare systems are to be held accountable for results, then the management of caseworkers and units should be balanced between compliance with a regulatory framework and an emphasis on outcomes. Professional commitment to knowledge-based practice and to high standards of conduct should be strongly supported, and initiative should be rewarded.

¹³ Center for Budget and Policy Priorities. Policy Basics: Introduction to the Food Stamp Program. Retrieved from CPBB website: www.cbpp.org/cms/index.cfm?fa=view&id=2226.

¹⁴ Food and Nutrition Act of 2008, as amended through P.L. 110-246, sec. 16.

¹⁵ United States Department of Agriculture News Release, June 24, 2010. Retrieved from USDA website www.fns.usda.gov/cga/PressReleases/2010/0341.htm.

¹⁶ Government Accountability Office. Food Stamp Program: States Have Made Progress Reducing Payment Errors, and Further Challenges Remain. Retrieved from GAO website www.gao.gov/new.items/d05245.pdf

¹⁷ Testa, M., & Poertner, J. (2010). *Fostering accountability: Using evidence to guide and improve child welfare policy*. New York: Oxford University Press. (pp. 295-296.)

Child welfare agencies can build a culture that rewards professional development by financially supporting graduate education and by paying increased salaries to caseworkers and supervisors who acquire certifications in substance abuse, mental health, family violence, child development and culturally competent practice. Recognition and rewards for outstanding performance can be dramatically increased. Master practitioner status can be accorded to caseworkers and supervisors based on a combination of educational criteria and actual accomplishments in child protection, permanency planning, and fostering the positive growth and development of children served by the child welfare system.

Practice-Based Research and Evaluation

A major goal of an accountability framework should be to expand our knowledge base by increasing federal and state governments' investment in research and evaluation and in adoption of evidence-informed and evidence-based practice. Casey Family Programs supports the development of funding mechanisms that will steadily increase the application of knowledge to practice, including federal support for intervention research, rigorous evaluation of promising practices and the dissemination of research-based practices. As it now stands, few child welfare practices or practice models have much of a research base prior to implementation, nor is there much in the way of post-implementation research.

The federal government is working to fill this gap through the use of targeted IV-E waivers, but the funding process is elaborate and difficult, requiring jurisdictions to develop a separate infrastructure to manage IV-E funded projects. Casey Family Programs proposes that the federal government support an enhanced capacity at the state and county level to evaluate the effectiveness of child welfare programs and practices in improving outcomes for the children, families and communities they serve.

Through such a program, the federal government can provide incentives for enhancing knowledge of child welfare practices by:

- Reimbursing research and evaluation in state agencies through the same formula used to reimburse training activities.
- Contracting with university-based child welfare centers to evaluate specific child welfare agency and dependency court programs and practices.
- Providing incentives to states to develop one or more research and development (R&D) sites in local child welfare offices and/or courts to test promising practices prior to statewide implementation.
- Funding an increased percentage of agencies' personnel costs in states' R&D sites.
- Funding and regularly disseminating "lessons from research" summaries written for practitioners.

As one children's mental health scholar commented: "If we want more evidence-based practice, we may need more practice-based evidence."¹⁸

Next Steps

Casey Family Programs and the American Public Human Services Association (APHSA) have partnered together with the shared goal of improving federal child welfare accountability. In 2010 and the first quarter of 2011, Casey Family Programs convened three meetings, attended by representatives from 37 child welfare jurisdictions, with the aim of creating a new vision for federal child welfare accountability. These meetings gave jurisdictions the opportunity to brainstorm and share ideas for an improved CFSR process. In addition, APHSA conducted telephone interviews with 49 states, as well as the District of Columbia and Puerto Rico, to solicit

further input. The information gathered through the meetings and the interviews will be used to develop detailed recommendations that will be submitted to the Administration for Children and Families in the second quarter of 2011.

These recommendations, based on the belief that child welfare should use the best available science and the most rigorous methodologies, will include some of the following suggestions:

- **Streamline and integrate child welfare data systems.** State data systems generally include comprehensive child-level information, including information about intake, assessment, placement and services. These feed two different national data systems, the National Child Abuse and Neglect Data System (NCANDS) and the Adoption and Foster Care Administrative Report System (AFCARS). Integrating NCANDS and AFCARS into one integrated system will provide longitudinal files that will allow for improved outcome measures and a better understanding of pre-placement services.
- **The accountability process should be intuitive, logical and integrated.** The process should minimize redundancies and maximize impact by clearly linking states' performance with the feedback they receive.
- **The qualitative components of the CFSTRs should be updated to reflect the capacity of individual states.** Since the inception of the CFSTR process, many states have developed Continuous Quality Improvement systems to meet their practice and program needs. The CFSTRs should consider which states might need more federal guidance during the on-site and self-assessment process, and which states already have a sophisticated accountability system in place.
- **Incentives are helpful; penalties are not.** Even with improved measures, incentivizing improved organizational performance is better for families than penalizing systems that need improvement.

Conclusion

The intent of the CFSTRs – to help states improve child welfare services and achieve safety, permanency, and improved well-being outcomes for families and children who receive services – is appropriate and commendable. While the current accountability system is not as effective in achieving this goal as it could be, lessons have been learned from the first two rounds of CFSTRs, and now is the time to apply these lessons. Casey Family Programs, along with other leaders in the field such as the National Association of Public Child Welfare Administrators and the American Public Human Services Association, supports a reformed child welfare accountability system that rewards innovation, promotes enhanced system capacity for research and evaluation, makes greater use of incentives, provides for flexible use of penalties, and aligns financing with outcomes. Such a system would allow child welfare agencies to better assess their performance and ensure that their work is effective in improving outcomes for vulnerable children and their families.

¹⁸ Weisz, J. R. (2004). *Psychotherapy for children and adolescents: Evidence-based treatments and case examples*. New York: Cambridge University Press, p. 472.



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Casey Family Programs is the nation's largest operating foundation focused entirely on foster care and improving the child welfare system. Founded in 1966, we work to provide and improve—and ultimately prevent the need for—foster care in the United States.

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