

Systemic Factors— Results From the CFSRs: 2015–2018



June 2020



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
Administration for Children & Families
Administration on Children, Youth and Families
Children's Bureau



Introduction

The Child and Family Services Reviews (CFSRs)¹ are a federal-state collaborative effort designed to help ensure that quality services are provided to children and families through state child welfare systems. One component of the CFSR is a determination of whether a state is in substantial conformity with 7 systemic factors. The systemic factors are associated with select Child and Family Services Plan (CFSP) requirements and refer to 7 systems² within a state that have the capacity, if routinely functioning³ statewide, to support positive child safety, permanency, and well-being outcomes.

¹ The 1994 Amendments to the Social Security Act (SSA), which were updated in the Adoption and Safe Families Act of 1997 (ASFA), authorized the U.S. Department of Health and Human Services (HHS) to review state child and family services programs to monitor conformity with the requirements in titles IV-B and IV-E of the SSA. The Children's Bureau, of the Administration for Children and Families (ACF) within HHS, implements the CFSRs.

² The 7 systemic factors are associated with select title IV-B and IV-E state plan requirements pursuant to 45 CFR § 1355.34(c).

³ The Children's Bureau considers a systemic factor to be "functioning" if it is occurring or is being met consistently and on an ongoing basis across the state for all relevant populations.



The 7 systemic factors are:

- **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**

The Children’s Bureau (CB) makes determinations of substantial conformity for the systemic factors based on states’ performance on 18 systemic factor items that are rated as Strengths or Areas Needing Improvement. The 18 items that comprise the 7 systemic factors and the criteria for determining substantial conformity with the systemic factors are listed in **Figure 1**.

CB uses information states submit in the Statewide Assessment Instrument to evaluate the routine statewide functioning of systemic factors and systemic factor items. States are required to provide an assessment of whether each systemic factor item is functioning based on recent and relevant data and information. This requires that states provide more than a description of the systemic factor item and applicable state regulations, programs, or policy.

CB modified the approach for evaluating systemic factor items in Round 3 of the CFSRs in an effort to rely more

heavily on qualitative and quantitative data and information provided by states in the statewide assessment.⁴ CB anticipated that states’ attention to strengthening continuous quality improvement (CQI) systems would result in a higher degree of quality and relevant data, and use of evidence to evaluate and demonstrate systemic factor functioning. CB also intended to reduce the reliance on stakeholder interviews to inform rating decisions and determinations of substantial conformity, and alleviate some concerns regarding the subjectivity and variability of information obtained from stakeholders.

The findings and information presented in this report should be considered in the following context:

- Results do not cover the totality of data/information gathered across all states and all items.
- Examples provided do not apply to all states and all items.
- Examples of the types of data states provided and the sources of the data do not cover the totality of data/information states may need to gather, assess, and submit to demonstrate systemic factor functioning.
- Each state’s unique child welfare system and accompanying process for data collection and analysis provide for a wide array of information included in statewide assessments and stakeholder interview notes. Thus, the information used to inform this report was not consistent in its quantity and quality across states and data sources.

Overall, this report reveals a need for improvement in systemic factor functioning. It also highlights the importance of collecting and using quality data and information so that child welfare agencies and their partners are able to assess and routinely monitor statewide functioning of systemic factors. The ongoing collection of quality data and information is necessary for both identifying strengths and challenges and evaluating and monitoring improvement efforts.

⁴ See CFSR Technical Bulletin #7: <https://www.acf.hhs.gov/cb/resource/cfsr-technical-bulletin-7>

Figure 1: CFSTR Systemic Factors/Items and Substantial Conformity Determinations

Systemic Factors/Items	Substantial Conformity Determinations
Systemic Factor 1: Statewide Information System Item 19: Statewide Information System	Substantial conformity requires that Item 19 be rated as a Strength.
Systemic Factor 2: Case Review System Item 20: Written Case Plan Item 21: Periodic Reviews Item 22: Permanency Hearings Item 23: Termination of Parental Rights Item 24: Notice of Hearings and Reviews to Caregivers	Substantial conformity requires that four of five items for this systemic factor be rated as a Strength.
Systemic Factor 3: Quality Assurance System Item 25: Quality Assurance System	Substantial conformity requires that Item 25 be rated as a Strength.
Systemic Factor 4: Staff and Provider Training Item 26: Initial Staff Training Item 27: Ongoing Staff Training Item 28: Foster and Adoptive Parent Training	Substantial conformity requires that two of three items for this systemic factor be rated as a Strength.
Systemic Factor 5: Service Array and Resource Development Item 29: Array of Services Item 30: Individualizing Services	Substantial conformity requires that one of two items for this systemic factor be rated as a Strength.
Systemic Factor 6: Agency Responsiveness to the Community Item 31: State Engagement and Consultation With Stakeholders Pursuant to CFSP and Annual Progress and Services Report (APSR) Item 32: Coordination of CFSP Services With Other Federal Programs	Substantial conformity requires that one of two items for this systemic factor be rated as a Strength.
Systemic Factor 7: Foster and Adoptive Parent Licensing, Recruitment, and Retention Item 33: Standards Applied Equally Item 34: Requirements for Criminal Background Checks Item 35: Diligent Recruitment of Foster and Adoptive Homes Item 36: State Use of Cross-Jurisdictional Resources for Placement	Substantial conformity requires that three of four items for this systemic factor be rated as a Strength.

Two of the 7 systemic factors, Statewide Information System and Quality Assurance System, are rated on the basis of only 1 item, which must be rated as a Strength to be in substantial conformity. The remaining 5 systemic factors are rated on the basis of multiple items. To be found in substantial conformity with these systemic factors, no more than 1 of the items can be rated as an Area Needing Improvement.

CFSTR Round 3 results show that nationally, there is an overall need for states to improve the routine statewide functioning of the systemic factors to better support child safety, permanency, and well-being outcomes.

Performance on Systemic Factors

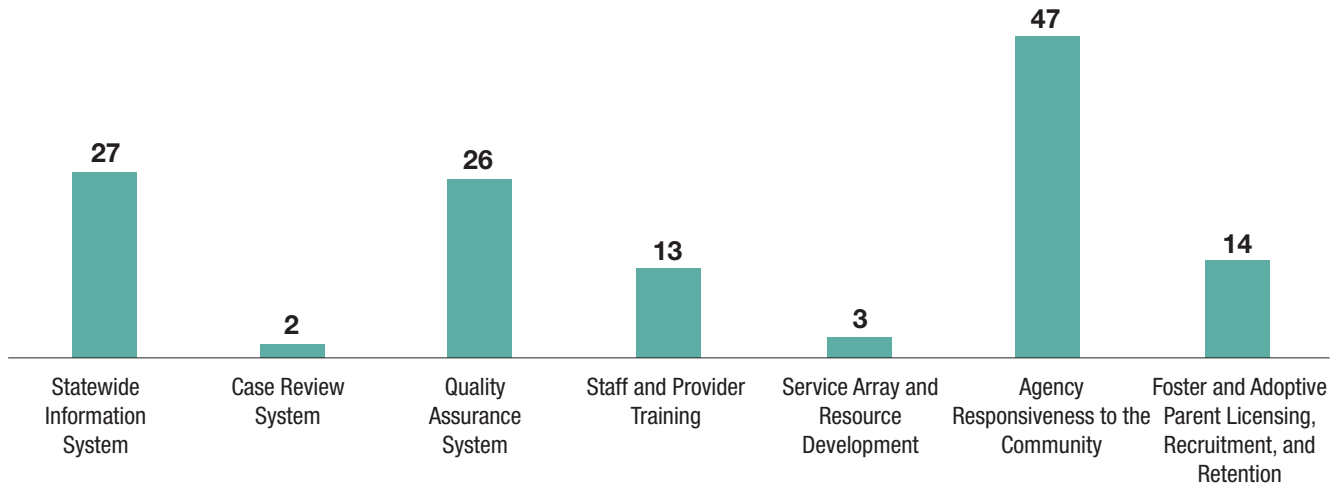
The results from CFSTR Round 3 show that nationally, there is an overall need for improvement in systemic

factor functioning. **Figure 2** shows how many of the states reviewed in Round 3 were determined to be in substantial conformity with each of the systemic factors. While more than half of the 51 states⁵ achieved substantial conformity with the systemic factors measuring **Statewide Information System, Quality Assurance System, and Agency Responsiveness to the Community**, 14 or fewer states achieved substantial conformity with the 4 remaining systemic factors: **Case**

⁵For the purposes of this report, the District of Columbia is included in the count of states. The Puerto Rico Round 3 CFSTR was canceled due to conditions following a hurricane.

Systemic Factors—Results From the CFSRs:
2015–2018

Figure 2: Number of States Achieving Substantial Conformity With Systemic Factors (n=51)



Review System (n=2), **Staff and Provider Training** (n=13), **Service Array and Resource Development** (n=3), and **Foster/Adoptive Parent Licensing, Recruitment, and Retention** (n=14).

Figure 3 shows state performance on items comprising each systemic factor. More than half of the states received a Strength rating on 8 of the 18 systemic factor items.

Most states received a Strength rating for the following systemic factor items:

- Item 19:** Statewide Information System
- Item 21:** Periodic Reviews
- Item 22:** Permanency Hearings
- Item 25:** Quality Assurance System
- Item 31:** State Engagement and Consultation With Stakeholders Pursuant to CFSP and APSR
- Item 32:** Coordination of CFSP Services With Other Federal Programs
- Item 33:** Standards Applied Equally
- Item 34:** Requirements for Criminal Background Checks

The following systemic factor items were the most challenging for states:

- Item 20:** Written Case Plan
- Item 23:** Termination of Parental Rights
- Item 24:** Notice of Hearings and Reviews to Caregivers
- Item 29:** Array of Services
- Item 30:** Individualizing Services
- Item 36:** Use of Cross-Jurisdiction Resources



Systemic Factors—Results From the CFSRs:
2015–2018

Figure 3: States Rated as a Strength on Items Comprising the Systemic Factors, Items 19–36 (n=51)

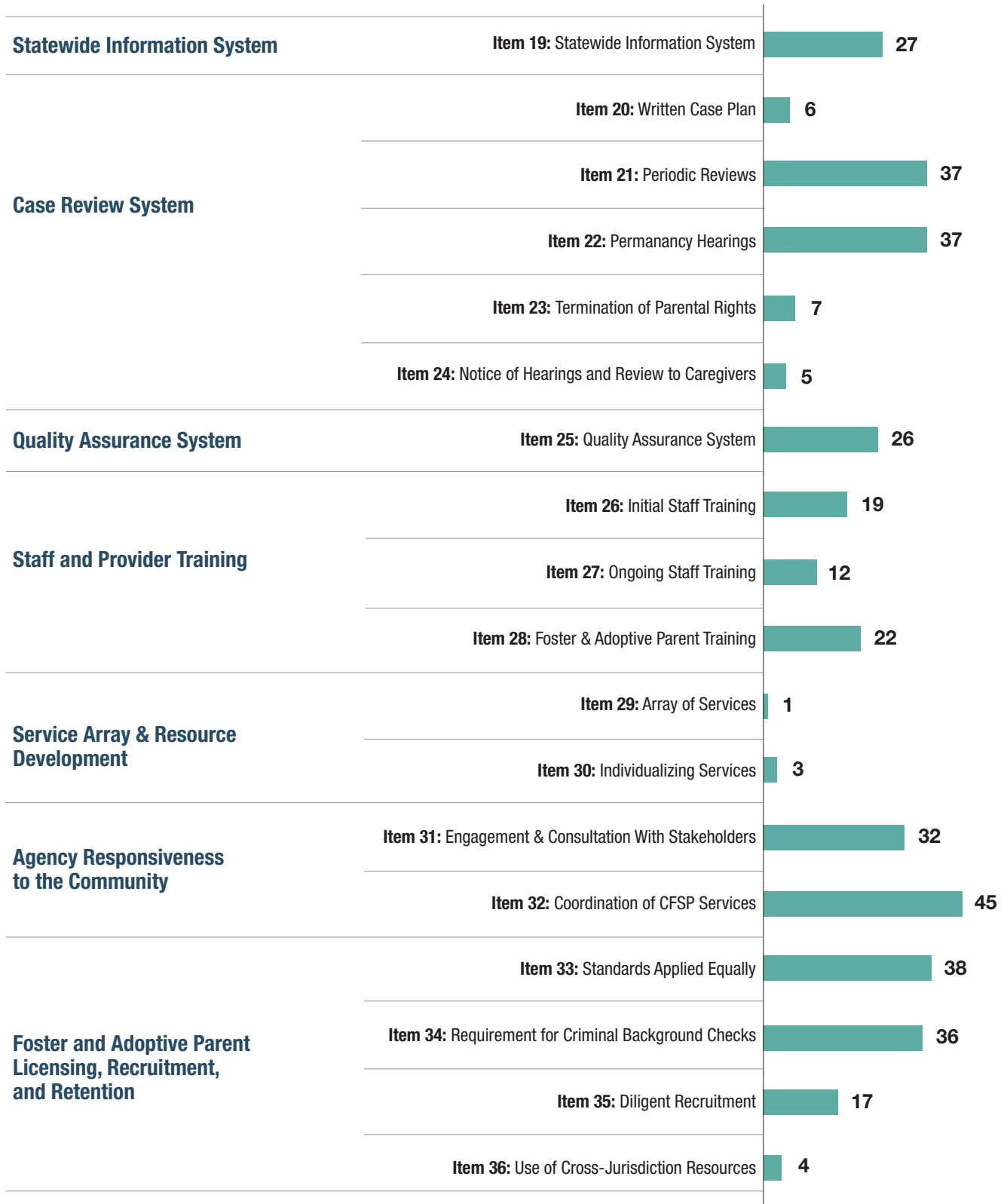


Figure 4 shows how many systemic factors were found to be in substantial conformity by the number of states. No state was found to be in substantial conformity with all 7 of the systemic factors. Most states were found to be in substantial conformity with 2 or fewer of the systemic factors. See Appendix A for information on challenges related to systemic factor functioning.

Evidence Used to Demonstrate Systemic Factor Functioning

To demonstrate systemic factor item functioning in the statewide assessment, states needed to provide recent, relevant, and reliable evidence that addressed all elements of functioning for each system factor item. In Round 3, the degree to which states were able to provide relevant quality data and information to demonstrate systemic factor functioning varied across states and systemic factors.

Where states were able to provide relevant and reliable data, they used sound measurement methods for the collection of quantitative and qualitative data. These states also provided information from a combination of sources to ensure that the totality of the systemic factor requirement was addressed. In addition, states described how they tracked and monitored related requirements, provided recent qualitative and/or quantitative data (including numerators and denominators), and provided the results of data analyses. For examples of the types of evidence used by states to demonstrate routine functioning statewide, see Appendix A.

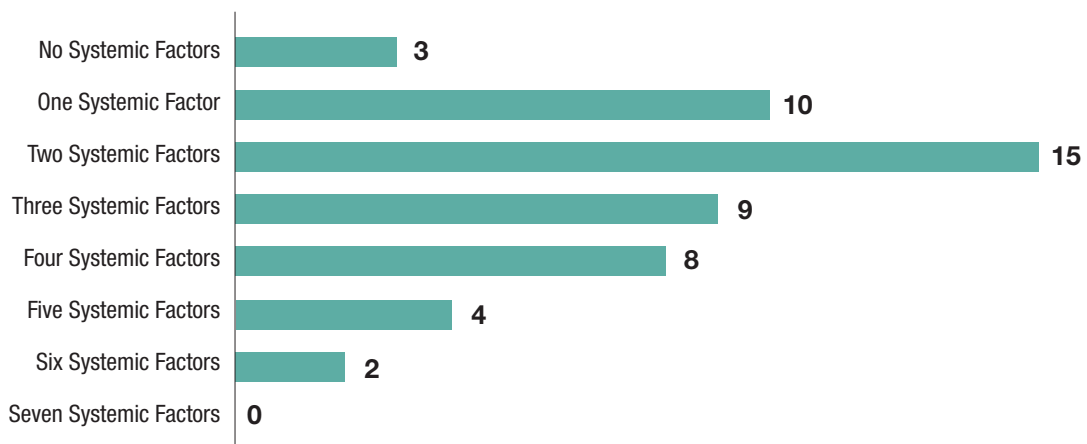
CB asked states to consider how the context and quality of the data informed systemic factor functioning, such as:

- The data source
- The methodology for calculating or analyzing the data
- The scope of the data (e.g., geographic, population)
- The time period applicable to the data
- The completeness, accuracy, and reliability of the data
- Other known limitation(s) of the data

Sampling, or selecting a representative subgroup (sample) from the population under study, can be an effective method for producing valid and reliable data. Some states' data collection plans included the use of sampling when it was not possible or practical to collect data and information about an entire population of individuals, cases, or records. These states employed the following methods to collect data to help evaluate systemic factor functioning:

- Surveys of groups such as agency staff, resource parents (foster and adoptive parents), parents and youth, and the legal and judicial community
- Case record reviews or targeted reviews using a random sample of records from all geographical locations to provide statewide information

Figure 4: Number of States That Substantially Achieved Systemic Factors



Systemic Factors—Results From the CFSRs: 2015–2018

- Instruments, tools, and structured questionnaires to standardize the collection of data and information

Some of these states also provided information about the process, timing, sampling methodology, questionnaire/instrument, and response rate.

Some states provided evidence of processes used to assess and address data integrity, including evidence showing results of these processes. Examples of these processes included:

- Routine use of software programs that identified reporting errors and follow-up with staff to notify and assist with correcting identified errors
- Information system-generated notices and action items to alert caseworkers when updates to data were required and/or to alert supervisors and managers when items were overdue for follow-up action
- Quality assurance (QA) reviews of a randomized sample of files to confirm the accuracy of data elements entered into state information systems

CB encouraged states to determine whether there was evidence readily available within the child welfare agency or from agency partners to be used in combination with other information to help demonstrate routine systemic factor functioning statewide. Examples of available data included:

- Data from federal, state, and local databases (e.g., Statewide Automated Child Welfare Information System, Comprehensive Child Welfare Information System, Supplemental Nutritional Assistance Program, Temporary Assistance for Needy Families, Medicaid, Geographic Information Systems, Adoption and Foster Care Analysis and Reporting System (AFCARS), National Child Abuse and Neglect Data System)
- Results from recent statewide case record reviews the agency conducted using a standardized instrument

- Data and information collected by the courts on timeliness of judicial court hearings
- Agency and court reports used to track compliance with Adoption and Safe Families Act (ASFA) requirements for termination of parental rights (TPR) and documentation of compelling reasons not to file TPR
- Reports from the agency training division or training partners showing completion of staff training compared to training required, and pre- and post-test scores regarding the effectiveness of training
- Contextual information and results from recent federal review or other oversight bodies, e.g., title IV-E reviews, AFCARS reviews, consent decree reports

Where states were able to provide relevant and reliable data, they used sound measurement methods for the collection of quantitative and qualitative data and information. States also provided evidence from a combination of sources to ensure that the totality of the systemic factor requirement was addressed.

Examples of helpful evidence states presented to demonstrate routine systemic factor item functioning statewide included combinations of:

- Quantitative and qualitative data from QA tracking systems, case reviews, targeted CQI reviews, program evaluations, system-generated management reports, surveys, and focus groups
- Descriptions of processes used to assess the accuracy of data, such as mechanisms to monitor and validate data entry, and take action to address data integrity issues
- Information regarding the quality, appropriateness, and relevance of the data (e.g., data source and scope, time period(s) represented, measurement methodology, reliability, limitations, analysis processes)

Systemic Factors—Results From the CFSRs: 2015–2018

- QA reports prepared by state staff completing licensing and oversight activities
- Evaluation data (e.g., agency research or university partner program evaluation reports)

Stakeholder Interviews

CB and states engaged in a collaborative process to plan, coordinate, and conduct stakeholder interviews to gather additional information needed to inform systemic factor rating decisions and determinations of substantial conformity. Interviews were often conducted jointly by CB and states with key stakeholder groups and partners, including, but not limited to, youth, parents, agency staff, resource families, the legal and judicial community, Tribal child welfare administrators, and service providers.

CB requires that stakeholder interviews be conducted for Systemic Factor Item 29: Array of Services, and Item 30: Individualizing Services. For other systemic factor items, stakeholder interviews were conducted for one of two reasons:

- Stakeholder interviews were needed to collect additional information to inform rating decisions and determine substantial conformity; or
- The state requested that interviews be conducted to help the state learn more about potential factors affecting the lack of routine systemic factor item functioning statewide.

In CFSR Round 3, CB sought to reduce reliance on stakeholder interviews to inform rating decisions and determinations of substantial conformity⁶ by providing guidance for states to strengthen CQI systems and to provide evidence demonstrating systemic factor functioning in their statewide assessments and CFSPs/APSRs. However, as results in **Figure 5** show, an extensive number of stakeholder interviews were required to make rating and conformity decisions.



Figure 5 identifies the number of states by systemic factor item in which stakeholder interviews were conducted, and the reasons for conducting those interviews. The results show that stakeholder interviews were necessary for more than half of the states for every systemic factor item. Nearly all stakeholder interviews were conducted to obtain additional information to inform rating and substantial conformity decisions. Results suggest that states struggled with collecting and/or providing evidence to demonstrate systemic factor functioning, and/or systemic factors were not routinely functioning as required statewide.

Systemic factor items that most often required stakeholder interviews to obtain more information included:

- **Item 21: Periodic Reviews**
- **Item 22: Permanency Hearings**
- **Item 27: Ongoing Staff Training**
- **Item 28: Foster and Adoptive Parent Training**
- **Item 31: Engagement and Consultation With Stakeholders**
- **Item 34: Requirements for Criminal Background Checks**

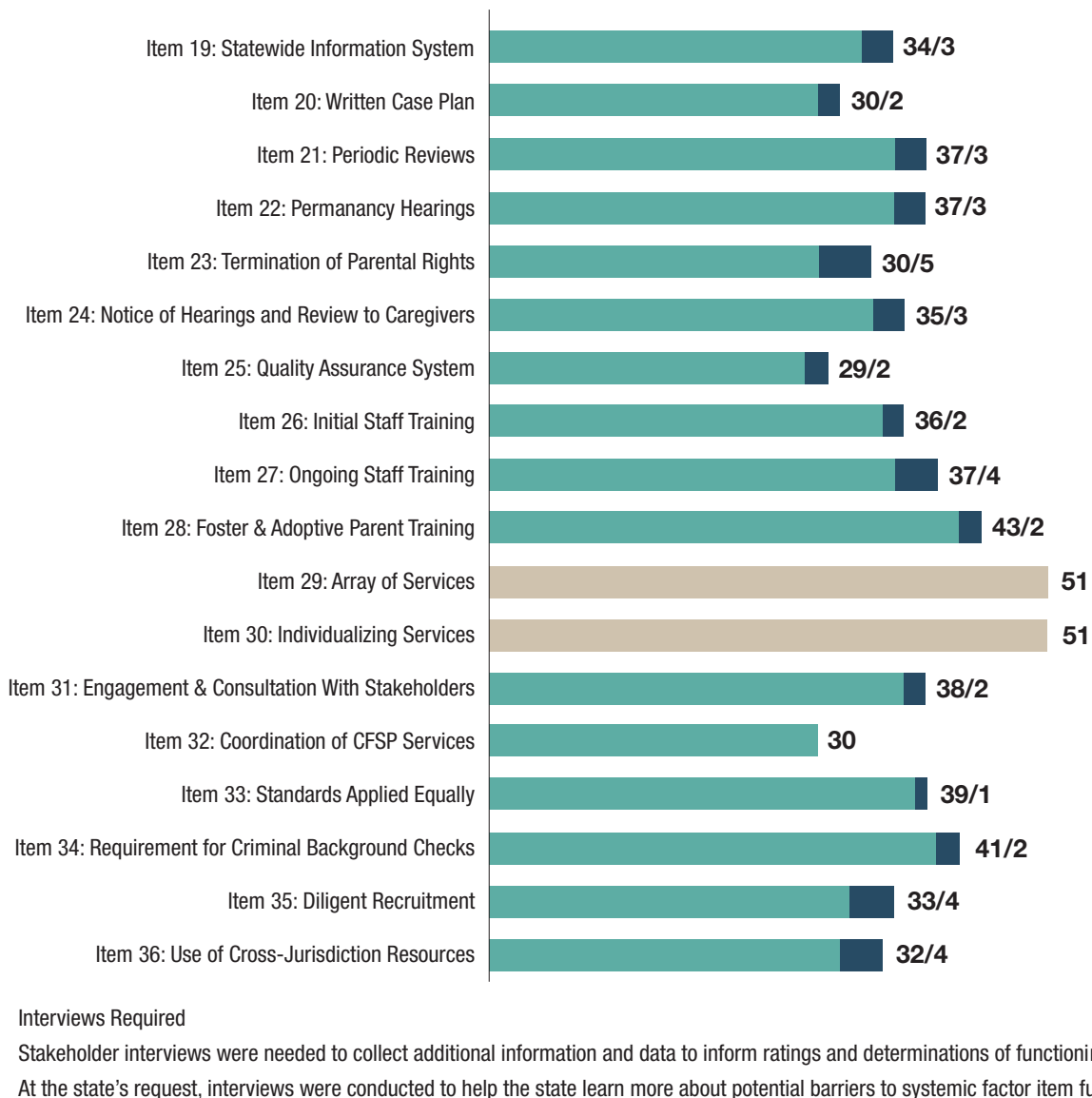
⁶ With the exception of Items 29 and 30, as CB requires that stakeholder interviews be conducted to provide information to inform rating decisions on those items.

Information Obtained From Stakeholder Interviews

Stakeholders who were interviewed provided information to supplement or address information missing from the statewide assessment. Stakeholders:

- Validated data presented in the statewide assessment.
- Provided additional information on how states managed data, including data collection methods, data validation mechanisms, data analysis, and use of data-based decision-making.
- Provided information and examples described in the statewide assessment pertaining to processes, activities, and technology used to facilitate routine statewide functioning.
- Shared examples of cooperation, information-sharing, regular communication, and engagement between the states and other organizations, agencies, and individuals.
- Provided information regarding how systemic factor elements functioned at local, regional, and state levels.

Figure 5: Number of States Where Stakeholder Interviews Were Conducted, By Item and Reason



Summary and Implications

This report highlights the overall need for states to improve systemic factor functioning and the meaningful collection and use of data and information to assess, strengthen, and demonstrate routine statewide functioning of related federal requirements.

A summary of key findings follows that may be a helpful resource for states working to develop and/or strengthen: data collection plans, processes to monitor and address data quality, and routine use of information and data to assess and improve systemic factor functioning statewide.

Types of Evidence Provided by States to Demonstrate Systemic Factor Functioning

When states provided recent, high-quality, and applicable quantitative and qualitative data showing that all systemic factor item requirements were met, the state provided:

- Concrete descriptions and examples of processes, implementation plans, and results
- Evidence of mechanisms in place to assess and monitor the validity and reliability of information
- Details regarding oversight processes
- Results of processes implemented as evidence of effectiveness
- Examples of when data were used to make changes to policy, practice, programs, and systems



States were most often able to provide sufficient information in the statewide assessment to demonstrate conformity with federal requirements for Item 32: Coordination of CFSP Services With Other Federal Programs.

Data sources often included: QA tracking systems; QA/CQI reviews; program evaluations; surveys and focus groups; federal, state, and local databases; and state and federal reviews/audits.

Missing, Incomplete, or Inconsistent Types of Evidence in Statewide Assessments

The types of data and information that were most often missing, incomplete, or inconsistent in statewide assessments included:

- Information on QA tracking processes used to assess and monitor how well systems are functioning
- QA/CQI reviews
- Descriptions of measurement methods
- Evidence demonstrating the reliability and validity of data
- Data demonstrating statewide performance on the systemic factor item
- Information that addresses all required elements of the systemic factor item
- Data demonstrating the effectiveness of programs, services, and trainings
- Information showing the results of implemented processes

Relevant Information Obtained From Stakeholder Interviews

Relevant information provided by stakeholders during interviews included:

- Validation or additional information to demonstrate that the data presented in the statewide assessments were accurate and reliable

- Information on how states managed data, including data collection methods, data validation mechanisms, data analysis, and use of data-based decision-making
- Examples of processes, activities, and technology that facilitated systemic factor functioning
- Examples of cooperation, information-sharing, regular communication, and engagement between the states and other organizations, agencies, and individuals
- Evidence of how systemic factor elements functioned at local, regional, and state levels
- Information and data demonstrating how states consistently monitored adherence to state policies, standards, and regulations related to systemic factor item requirements.

KEY TAKEAWAYS:

- **Systemic factors have the capacity, if routinely functioning statewide, to support desired child safety, permanency, and well-being outcomes.**
- **There is an overall need for states to improve systemic factor functioning, meaningful quality data collection, and use of data to assess and strengthen routine systemic factor functioning statewide.**
- **In general, states faced greater challenges in providing applicable quantitative and qualitative data/information to evaluate and/or demonstrate routine statewide functioning of systemic factor items than anticipated, which resulted in a greater reliance on stakeholder interviews.**
- **Descriptions and results of relevant tracking, assessment, and evaluation processes were often not included in statewide assessments.**

Recommendations for States

State performance on systemic factors in Round 3 and analysis of related data identify a need for states to develop and implement strategies to help assess, monitor, strengthen, and provide evidence of routine statewide functioning.⁷ Recommendations for states to consider include:

- Strengthening understanding of federal requirements associated with systemic factor items
- Using CFSR and CFSP/APSR findings to assess and address systemic factors
- Devoting resources to enhance capacity, processes, and systems to develop, implement, and maintain sound measurement methods, collection of relevant quality data, integrity of data, data analysis, and dissemination of data to routinely assess and monitor systemic factor functioning statewide
- Strengthening routine use of relevant data/information collected by CB, the state child welfare agency, and other partners to evaluate and improve systemic factor functioning both internally and in collaboration with stakeholders and partners (e.g., staff from all levels of the agency, the judicial and legal community, parents and youth, resource families, Tribes, other state and federal programs)

Appendix A

This appendix is a compilation of systemic factor information from CFSR Round 3. It includes a description of each of the systemic factor items, examples of the combination of evidence used by states that may have contributed to Strength ratings, and some of the challenges states experienced with the provision of evidence and/or the functioning of each systemic factor item.

⁷ For additional information and resources, please see Appendix B.

Examples of evidence and challenges were obtained from Statewide Assessment Instruments. Information obtained from stakeholder interviews conducted by the Children’s Bureau in partnership with states was used to identify and illuminate some of the challenges experienced by states. The examples of evidence provided and challenges states experienced do not cover the totality of information obtained from all states.

This compendium of information provides a resource for states in the process of identifying, developing, and using evidence to assess, monitor, strengthen, and demonstrate routine functioning of systemic factors statewide.

Statewide Information System

Item 19: Statewide Information System

Description

How well is the statewide information system functioning statewide to ensure that, at a minimum, the state can readily identify the status, demographic characteristics, location, and goals for the placement of every child who is (or within the immediately preceding 12 months, has been) in foster care?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided excerpts of management information reports demonstrating the system’s capacity to collect and track timely entry of the required data elements, and relevant performance data showing the required data elements are readily available from the statewide information system.
- States included information about mechanisms in place to monitor timely and accurate data entry.
- States provided results from recent federal or state audits demonstrating review, verification, and accuracy of required data elements.

Challenges Affecting Systemic Factor Functioning

- Staff vacancies, turnover, and high workloads impacted the accuracy of data, timeliness of data entry, and monitoring done by supervisors.



- States did not have processes in place to assess, monitor, and address data quality.
- States lacked child welfare agency policy and procedures to provide caseworkers with expectations and timeframes to update the statewide information system after a child experiences a placement change.

Case Review System

Item 20: Written Case Plan

Description

How well is the case review system functioning statewide to ensure that each child has a written case plan that is developed jointly with the child’s parent(s) and includes the required provisions?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided a description of state policy, practice expectations, and routine process to engage parents in the ongoing case planning process, such as Family Team Meetings.
- States provided quantitative data from statewide information management or a standalone tracking system showing parent participation in case planning meetings and the presence of written case plans for children in foster care.
- States provided results from recent statewide case record reviews using a standard case review

instrument, such as the Onsite Review Instrument and Instructions (OSRI), showing parent involvement in case planning.

Challenges Affecting Systemic Factor Functioning

- Agency lacked a routine process to engage parents in the case planning process.
- States lacked a method to collect data to assess and demonstrate that each child in foster care had a case plan, and that the plan was developed jointly with the child's parents.
- Child welfare agency staff turnover and vacancies contributed to a lack of parent engagement in the case planning process.

Item 21: Periodic Reviews

Description

How well is the case review system functioning statewide to ensure that a periodic review for each child occurs no less frequently than once every 6 months, either by a court or by administrative review?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided quantitative data from the agency, court, and/or administrative review board QA tracking systems demonstrating timely completion rates for periodic reviews for children in foster care.



- States described and provided information showing the effective use of an automated scheduling process for periodic reviews.
- States provided results of a recent statewide survey of legal and judicial community and agency caseworkers and supervisors indicating that the judicial periodic review process functions to ensure that a review for each child occurs more frequently than once every 6 months.

Challenges Affecting Systemic Factor Functioning

- Workloads of child welfare agency caseworkers hindered the agency's ability to timely complete and submit reports required for periodic reviews.
- Court continuances affected timeliness of reviews.
- Court workloads and crowded court dockets limited the ability for reviews to occur timely.
- The agency could not distinguish between court hearings that met or did not meet periodic review requirements.

Item 22: Permanency Hearings

Description

How well is the case review system functioning statewide to ensure that, for each child, a permanency hearing in a qualified court or administrative body occurs no later than 12 months from the date the child entered foster care and no less frequently than every 12 months thereafter?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States included quantitative data from agency and court data systems showing timely completion rates for foster care cases requiring permanency hearings (e.g., initial permanency hearing within 12 months of removal or within 12 months of last permanency hearing, statewide average between date of child entering foster care and first permanency hearing, median number of days between ongoing permanency hearings).

Systemic Factors—Results From the CFSRs: 2015–2018

- State provided results of focus groups with caseworkers, supervisors, administrators, and resource families reporting that permanency hearings are held for children prior to 12 months in foster care and annually thereafter.
- State provided survey results of court and legal representatives showing respondents agreed that permanency hearings for children in foster care are held at least annually.
- States provided recent results of the federal Title IV-E Foster Care Eligibility Review.

Challenges Affecting Systemic Factor Functioning

- Workloads of child welfare agency caseworkers hindered their ability to timely complete reports necessary for permanency hearings to be held.
- Court workloads and crowded court dockets limited the ability for permanency hearings to occur timely.
- Court continuances affected timeliness of permanency hearings.
- Aggregate data did not include all children in care for whom permanency hearings applied.
- A lack of attorneys available to represent children and parents affected the timeliness of permanency hearings.

Item 23: Termination of Parental Rights

Description

How well is the case review system functioning statewide to ensure that the filing of termination of parental rights (TPR) proceedings occurs in accordance with required provisions?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided quantitative data from the agency and court demonstrating the timely filing of termination of parental rights TPR proceedings for children in foster care for 15 of the most recent 22 months.



- States provided management information reports used to identify children in care for 15 of the most recent 22 months that showed TPRs were filed timely or compelling reasons were documented in the case plan to support that TPR would not be in the best interests of the child.
- States included results from recent statewide case record reviews using a standard instrument such as the OSRI or the results from recent statewide targeted case reviews of a sufficient sample of cases involving children in care for 15 of the most recent 22 months demonstrating the timely filing of TPR or documentation of compelling reasons.

Challenges Affecting Systemic Factor Functioning

- State management information systems are unable to identify children in care for 15 of the most recent 22 months, TPR filing dates, and compelling reasons necessary to track, manage, and demonstrate routine statewide functioning of this requirement.
- Child welfare agency staff and attorney caseloads, turnover, and vacancies hindered the agency's ability to prepare and file the TPR petition.
- There was a lack of coordination concerning roles, responsibilities, and timeframes among agency and legal staff/personnel that hindered timely filing of TPR petitions.

Systemic Factors—Results From the CFSTRs: 2015–2018

- Attorney/agency requested that parents be given more time to demonstrate progress before TPR.
- Attorney/agency did not file a TPR petition based on the opinion that grounds for TPR did not exist (e.g., the agency did not engage parents and provide needed services) regardless of the Adoption and Safe Families Act timeframe.
- There were delays in the agency locating parents and identifying/serving multiple fathers.

Item 24: Notice of Hearings and Reviews to Caregivers

Description

How well is the case review system functioning statewide to ensure that foster parents, pre-adoptive parents, and relative caregivers of children in foster care are notified of, and have a right to be heard in, any review or hearing held with respect to the child?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided recent statewide quantitative data from child welfare agency tracking systems demonstrating notice of hearings and right to be heard are routinely provided to caregivers.
- States provided court-generated quantitative and/or qualitative data showing adherence to the notice of hearings to caregivers requirement.



- States provided results from recent statewide case record reviews or a targeted statewide review of a sufficient sample of cases showing resource parents received notice of hearings and reviews and their right to be heard.
- States included results of recent statewide surveys of resource parents confirming that they routinely receive notice of hearings and reviews and their right to be heard.

Challenges Affecting Systemic Factor Functioning

- States lacked quantitative or qualitative data to assess how well this item is functioning statewide.
- States lacked processes to notify caregivers of hearings and reviews as required.
- Processes for resource family notification of reviews and hearings were inconsistent across the state or were not consistently implemented, resulting in resource families not routinely receiving notice of hearings and reviews, and/or receiving the notifications late.
- The state information management system was not updated timely to identify new resource families caring for children who experienced changes in their placement settings.
- Incorrect resource family addresses were in the state information management system.

Quality Assurance System

Item 25: Quality Assurance System

Description

How well is the quality assurance system functioning statewide to ensure that it is (1) operating in the jurisdictions where the services included in the Child and Family Services Plan (CFSP) are provided, (2) has standards to evaluate the quality of services (including standards to ensure that children in foster care are provided quality services that protect their health and safety), (3) identifies strengths and needs of the service delivery system, (4) provides relevant reports, and (5) evaluates implemented program improvement measures?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided evidence showing how each of the five required QA elements were functioning as intended across the state. Examples included: QA staff in each region, schedule of case review activities across the state, reference to specified standards to evaluate services, processes used and examples of strengths and areas needing improvement identified from QA system, examples of relevant QA reports, processes and examples of evaluation of implemented strategies/interventions.
- States provided results of recent statewide case record and licensing/certification file reviews demonstrating the application of federal, state, or agency standards/program requirements and the creation and monitoring of corrective action plans.
- States included examples of their ability to track, analyze, and address results of QA reviews and performance management reports on a routine basis.
- States provided examples of continually monitoring and addressing findings from program implementation and evaluation data.
- States provided evidence of standardized CQI training protocols, development of regional/county Quality Improvement Plans, use of dedicated CQI specialists, and work of statewide CQI committee.
- States included information about regularly scheduled meetings with external and internal stakeholders to analyze performance reports, survey results, and case record review data, and provided evidence of actions taken to address findings and dissemination of information and feedback.

Challenges Affecting Systemic Factor Functioning

- There was a lack of infrastructure and capacity to routinely implement a comprehensive QA/CQI system statewide with quality.
- States lacked a process for identifying strengths and needs of the service delivery system, including engagement of stakeholders in the process.

- States lacked feedback loops to inform CQI practices.
- States did not consistently perform QA/CQI functions across the entire state.
- States lacked a process to evaluate implemented program improvement changes.
- States lacked standards and instruments to evaluate the quality of services.
- QA/CQI activities were not integrated into agency operations.
- High caseloads and competing priorities made it difficult for staff to find time to lead and participate in QA/CQI activities.

Staff and Provider Training

Item 26: Initial Staff Training

Description

How well is the staff and provider training system functioning statewide to ensure that initial training is provided to all staff who deliver services pursuant to the CFSP that includes the basic skills and knowledge required for their positions?

- Staff receive training pursuant to the established curriculum and timeframes for the provision of initial training; and
- The initial training addresses basic skills and knowledge needed by staff to carry out their duties.



Staff, for purposes of assessing this item, includes all contracted and non-contracted staff who have case management responsibilities in the areas of child protection services, family preservation and support services, foster care services, adoption services, and independent living services pursuant to the state's CFSP.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided information on established initial training requirements and learning objectives for all relevant staff positions (contract and non-contract), and quantitative data from learning management systems showing completion rates for initial staff training.
- States included documentation demonstrating that new caseworkers completed training before being assigned cases.
- States provided results of recent statewide focus groups and/or surveys of caseworkers and supervisors who reported satisfaction with case management staff training, and training addressed basic skills and knowledge needed to perform the job.
- States included data showing recent training evaluation results that demonstrated caseworker satisfaction, and supervisor training was effective.



Challenges Affecting Systemic Factor Functioning

- While some states provided information on initial staff training requirements, modules, and/or courses, some states were unable to provide evidence of the routine collection and analysis of relevant data on staff training specific to this requirement.
- States had gaps and inconsistencies between information learned in the classroom and the skills necessary to carry out case management responsibilities.
- There was variation in training requirements, protocols, and systems for county-administered states that lacked a statewide system to track adherence to training requirements.
- States lacked procedures and data pertaining to contracted case management staff.
- Trainings were not offered with sufficient frequency or at times and locations that facilitated timely completion of staff training.
- New caseworkers were assigned caseloads before completing initial training.

Item 27: Ongoing Staff Training

Description

How well is the staff and provider training system functioning statewide to ensure that ongoing training is provided for staff that addresses the skills and knowledge needed to carry out their duties with regard to the services included in the CFSP?

- Staff receive training pursuant to the established annual, bi-annual hourly, or continuing education requirement and timeframes for the provision of ongoing training; and
- The ongoing training addresses skills and knowledge needed by staff to carry out their duties with regard to the services included in the CFSP.

Staff, for purposes of assessing this item, include all contracted and non-contracted staff who have case management responsibilities in the areas of child

Systemic Factors—Results From the CFSRs: 2015–2018

protection services, family preservation and support services, foster care services, adoption services, and independent living services pursuant to the state's CFSP, and the direct supervisors of those contracted and non-contracted staff.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided information on established ongoing training requirements for all staff (contract and non-contract) positions, and quantitative data from learning management systems showed completion rates for ongoing staff training.
- States provided participants' evaluation data for ongoing trainings (e.g., data showing whether participants believed key learning and skill application objectives were met).
- States included qualitative data from surveys or focus groups of caseworkers and supervisors showing ongoing training meets the needs of staff.

Challenges Affecting Systemic Factor Functioning

- Some states did not have ongoing training requirements.
- While some states provided information on ongoing staff training requirements, modules, and/or courses, the state was unable to provide evidence of routine collection and analysis of relevant data on staff training specific to this requirement.
- Caseworkers were not always aware of ongoing training opportunities and training requirements.
- Caseworkers and supervisors reported a need for more skills-based activities that reflect real-world situations.
- States lacked ongoing/specialized training for new supervisors.
- Competing workload demands impeded staff ability to attend trainings.
- States lacked procedures and information pertaining to contracted staff.



- Trainings were not offered with sufficient frequency or at times and locations that facilitated staff attendance.

Item 28: Foster and Adoptive Parent Training

Description

How well is the staff and provider training system functioning to ensure that training is occurring statewide for current or prospective foster parents, adoptive parents, and staff of state licensed or approved facilities (that care for children receiving foster care or adoption assistance under title IV-E) that addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children?

- They receive training pursuant to the established annual, bi-annual hourly, or continuing education requirement and timeframes for the provision of initial and ongoing training.
- The initial and ongoing training addresses the skills and knowledge base needed to carry out their duties with regard to foster and adopted children.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided information on established training requirements for prospective and current foster and adoptive parents, and staff of state facilities.
- States provided quantitative data from learning management data systems showing timely completion of training.
- States included qualitative data showing that resource parents, and staff of facilities evaluated, were satisfied with trainings.

Systemic Factors—Results From the CFSRs: 2015–2018

- States provided evaluative information showing that training addressed the skills and knowledge necessary for resource parents to perform their roles.
- States provided data showing that state licensed and approved facility staff met training requirements.
- States included qualitative data from surveys or focus groups of resource parents, and state licensed facility staff, showing that training provides the knowledge and skills needed to care for foster and adopted children.

Challenges Affecting Systemic Factor Functioning

- States lacked methods and/or data to track, monitor, and follow up on resource parents, kinship providers', and/or staff of state licensed or approved facilities' compliance with agency training requirements.
- There was a lack of training on relevant topics, e.g., relative care, trauma-informed care, the legal and judicial process, LGBTQ issues.
- Trainings were not offered with sufficient frequency or at times and locations that facilitated participation.
- States did not provide options for childcare to support caregivers' attendance at trainings.
- Resource parents reported inconsistent quality of trainings.
- Training and training materials were not consistently available in languages other than English.



Service Array and Resource Development

Item 29: Array of Services

Description

How well is the service array and resource development system functioning to ensure that the following array of services is accessible in all political jurisdictions covered by the CFSP?

- Services assess the strengths and needs of children and families and determine other service needs;
- Services address the needs of families in addition to individual children in order to create a safe home environment;
- Services enable children to remain safely with their parents when reasonable; and
- Services help children in foster and adoptive placements achieve permanency.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided information and results of state and local multi-disciplinary teams comprising broad membership, including external stakeholders, that completed an assessment of the array, availability, and quality of services.
- States provided findings from evaluations assessing the effectiveness of service programs.
- States included quantitative and qualitative stakeholder feedback from recent statewide surveys showing satisfaction with the availability and quality of services.
- States provided recent focus group results with parents, youth, and agency staff from across the state reporting that an array of services are available that meet the needs of children, youth, and family served by the agency.
- States included information on services available in jurisdictions statewide across the four categories identified in this item.

Systemic Factors—Results From the CFSRs: 2015–2018

- States provided a description of services available statewide and quantitative data on the number of families referred to and receiving each service.

Challenges Affecting Systemic Factor Functioning

- States struggled with the collection and analysis of evidence to show that the array of required services is available and meets the needs of children and families statewide.
- States lacked specific types of services to address family needs (e.g., housing, parent-child-sibling visitation, quality mental health and substance use disorder treatment, trauma-informed services, domestic violence services, employment assistance, childcare).
- There was a lack of services in rural areas of the state.
- Access to services was limited due to lack of transportation, provider capacity, or service availability during times convenient for families.
- Service availability was limited due to a lack of funding.
- Waitlists existed for various services across the state or within specific areas of the state.

Item 30: Individualizing Services

Description

How well is the service array and resource development system functioning statewide to ensure that the services in Item 29 can be individualized to meet the unique needs of children and families served by the agency?



- Services are developmentally and/or culturally appropriate (including linguistically competent), responsive to disability and special needs, or accessed through flexible funding, as examples of how the unique needs of children and families are met by the agency.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States included descriptions of funds available to individualize services for families and included utilization rates for the funds.
- States provided results from recent statewide case record reviews using a standard instrument such as the OSRI that demonstrated individualization of services to families.
- States provided recent statewide survey and focus group results with parents, youth, and agency staff from across the state reporting that services are tailored to meet the individual needs of children, youth, and families served by the agency.
- States provided descriptions of culturally appropriate services, and information and services to meet the needs of non-English-speaking populations, and included data on the need and use of those services.
- States provided descriptions of processes and services used to individualize services for children with developmental disabilities.
- States provided documentation of how results of child, parent, and caregiver assessment data were routinely used to tailor services to meet individual needs.

Challenges Affecting Systemic Factor Functioning

- States struggled with the collection and analysis of evidence to show mechanisms in place and functioning routinely to tailor services to meet the individual needs of children and families statewide.
- States lacked funding to individualize services to meet children, youth, and family needs.

Systemic Factors—Results From the CFSRs: 2015–2018

- There were challenges in finding providers with the capacity and expertise needed to meet the individual needs of families.
- States were unable to meet the cultural needs of the diverse populations they served.
- There was a lack of service providers to provide services and information in languages other than English.
- Agency staff were not always aware of all the available services.

Agency Responsiveness to the Community

Item 31: State Engagement and Consultation With Stakeholders Pursuant to CFSP and APSR

Description

How well is the agency responsiveness to the community system functioning statewide to ensure that, in implementing the provisions of the CFSP and developing related APSRs, the state engages in ongoing consultation with Tribal representatives, consumers, service providers, foster care providers, the juvenile court, and other public and private child- and family-serving agencies and includes the major concerns of these representatives in the goals, objectives, and annual updates of the CFSP?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States identified established ongoing collaborations and consultation sought through councils and workgroups with various stakeholders, partners, and Tribes from across the state that informed the state's development of the CFSP and APSR.
- States provided examples of engaging stakeholders and using their feedback in the agency's strategic planning and CQI processes, including the CFSP and APSR.
- States included data from recent statewide surveys and focus groups held with older youth, parents, agency staff, and other key stakeholders and partners showing respondents/participants were



consistently involved in identifying and assessing the achievement of agency goals and objectives, and implementation and evaluation of related strategies and interventions.

- States provided examples of how they kept stakeholders informed of emerging issues and progress through presentations, reports, websites, and publicly available performance dashboards.

Challenges Affecting Systemic Factor Functioning

- States failed to engage or had limited processes for engaging some key stakeholders and partners, such as parents, resource parents, caseworkers, and Tribes.
- States lacked continuous open dialogue with stakeholders, and there were uneven efforts to engage stakeholders at different levels or to incorporate their feedback.
- States inconsistently invited stakeholder participation and/or did not provide sufficient notice to stakeholders to participate in consultations.

Item 32: Coordination of CFSP Services With Other Federal Programs

Description

How well is the agency responsiveness to the community system functioning statewide to ensure that the state's services under the CFSP are coordinated with services or benefits of other federal or federally assisted programs serving the same population?



Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States described in detail coordination with federally funded service programs and collaboration with a wide array of federal agencies and/or agencies receiving federal funds/grants.
- States provided descriptions, examples, and data showing the coordination of services and benefits with other federal or federally assisted programs serving the same population.
- States included information regarding formal Memoranda of Understanding (MOUs) and informal agreements with agencies managing federal programs and established methods for ongoing communication.
- States provided recent statewide survey results with community professionals, agency staff, and the judicial and legal community agreeing that child welfare services are coordinated with other federal programs, such as housing, mental health services, and Medicaid.

Challenges Affecting Systemic Factor Functioning

- States inconsistently coordinated services across the state.
- States lacked an ongoing mechanism to collect data and information about whether and how agencies coordinated services across federal or federally funded programs.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

Item 33: Standards Applied Equally

Description

How well is the foster and adoptive parent licensing, recruitment, and retention system functioning statewide to ensure that state standards are applied to all licensed or approved foster family homes or childcare institutions receiving title IV-B or IV-E funds?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided results of certification and licensing reviews showing compliance with state standards, including the creation and monitoring of corrective action plans or licensure/certification revocation.
- States included data demonstrating consistent monitoring of licensing agencies, including periodic reviews of the licensing process.
- States demonstrated the use of standard tools, such as checklists and uniform training, to ensure statewide consistency in the application of state licensing standards.
- States provided results of QA reviews to show consistent application of and compliance with licensing standards.
- States provided recent statewide survey and/or focus group results with agency staff and resource families showing that respondents and/or participants believed that licensing standards were applied equally.

Challenges Affecting Systemic Factor Functioning

- States did not have ongoing processes in place to collect, analyze, monitor, and show that licensing standards were consistently applied statewide.
- States applied standards inconsistently across the state.
- States struggled to consistently apply specific components of state licensing standards, as evidenced by overdue criminal background

checks, out-of-date licensee medical exams, and insufficient completion of ongoing training hours.

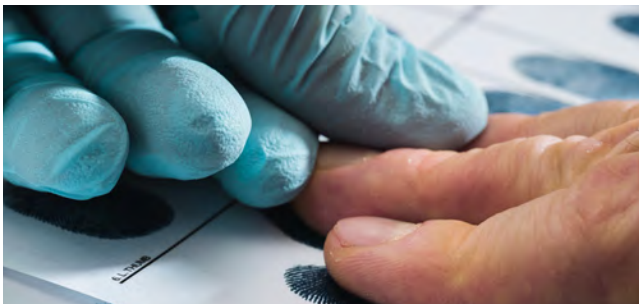
Item 34: Requirements for Criminal Background Checks

Description

How well is the foster and adoptive parent licensing, recruitment, and retention system functioning statewide to ensure that the state complies with federal requirements for criminal background clearances as related to licensing or approving foster care and adoptive placements, and has in place a case planning process that includes provisions for addressing the safety of foster care and adoptive placements for children?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided quantitative data demonstrating compliance with required background check requirements, including the number required, number processed, processing time, and information on appeals.
- States provided descriptions of relevant policies, standards, and methods to ensure the safety of foster and adoptive placements.
- States demonstrated that case planning processes included provisions for addressing the safety of foster and adoptive placements for children by providing data, such as the agency's response to allegations of maltreatment in foster care and analyses of critical incidents.
- States provided evidence regarding the use of automated systems to share relevant information



between the child welfare agency and law enforcement about resource family members or staff at childcare institutions to help meet federal requirements for criminal background clearances.

- States provided results from a recent targeted statewide case record review of a random sample of foster homes showing criminal history background checks are conducted routinely statewide, and negative findings were addressed according to agency policy.
- States provided results of a recent IV-E Review showing the state was in substantial compliance and all cases had required criminal background clearances.

Challenges Affecting Systemic Factor Functioning

- States experienced challenges in processing criminal background checks, including accessibility to approved entities able to take fingerprints, time needed to process background checks, and ability to collect information needed to review concerns identified in a background check.
- Staff were unclear on agency requirements when criminal background checks revealed a concern.
- States experienced difficulty in consistent and timely sharing of relevant information across agencies and providers.
- There was not a well-defined process to ensure that criminal background checks occurred when a new adult moved into the household or a household member turned 18 years of age.
- Agencies did not have information on compliance with criminal background checks for foster or adoptive parents licensed/approved by agencies other than the child welfare agency.
- States' lack of placement resources and/or reported arduous waiver approval process contributed to exceptions being made to place children with resource families without a background check or related to criminal history.

Item 35: Diligent Recruitment of Foster and Adoptive Homes

Description

How well is the foster and adoptive parent licensing, recruitment, and retention system functioning to ensure that the process for ensuring the diligent recruitment of potential foster and adoptive families who reflect the ethnic and racial diversity of children in the state for whom foster and adoptive homes are needed is occurring statewide?

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States provided a clear description of a diligent recruitment plan operating statewide and evidence that adjustments were informed by the use of relevant data on the ethnic and racial diversity of foster and adoptive homes and children in care.
- States provided evidence that they routinely evaluated the effectiveness of recruitment strategies statewide.
- States identified established recruitment strategies for foster and adoptive families that reflected the diversity of the children in foster care.
- States included descriptions of processes for child-specific recruitment activities being undertaken and provided data on success rates.

Challenges Affecting Systemic Factor Functioning

- States lacked a statewide diligent foster and adoptive family recruitment plan.
- Diligent recruitment plans were not data-driven and as a result did not focus on all populations of children needing foster and adoptive families.
- States lacked centralized oversight of recruitment plans.
- States utilized a “one size fits all” approach to diligent recruitment.
- States lacked resources to develop region/county-specific diligent recruitment plans, especially for rural communities.



Item 36: State Use of Cross-Jurisdictional Resources for Permanent Placements

Description

How well is the foster and adoptive parent licensing, recruitment, and retention system functioning to ensure that the process for ensuring the effective use of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children is occurring statewide?

- For example, the percentage of all home studies received from another state to facilitate permanent foster or adoptive care placement that is completed within 60 days.

Combination of Evidence Used to Demonstrate Systemic Factor Functioning

- States included statewide data on timely achievement of permanency for waiting children, and data regarding timely completion of home studies.
- States provided information demonstrating effective utilization of cross-jurisdictional resources, such as local, state, and national adoption exchanges and other resources used to facilitate timely permanency placements for waiting children.
- States provided information regarding formal Memoranda of Understanding (MOU) to facilitate timely permanency for waiting children, such as agreements with the Mexican Consulate, Tribes to secure out-of-state Tribal placements, and

Medicaid Care Coordinators who help identify out-of-state placements for children with special needs.

Challenges Affecting Systemic Factor Functioning

- States lacked systems to track and monitor compliance with timeframes for completing home studies.
- States lacked quality data and information about children legally free and not in a permanent placement.
- States lacked processes for documenting and tracking the referral, use, and effectiveness of cross-jurisdictional resources to facilitate timely adoptive or permanent placements for waiting children.
- Child welfare agency workloads and limited staff resources contributed to delays in completing home studies within required timeframes.
- States attributed delays in meeting required home study timeframes to an array of challenges, such as coordination, communication, and some states requiring full licensure to approve a placement request or for children to be legally free to request an adoption home study.



Appendix B

Information and Resources

Annual Progress and Services Report checklist: https://www.acf.hhs.gov/sites/default/files/cb/state_checklist.pdf

CFSR Procedures Manual: https://www.acf.hhs.gov/sites/default/files/cb/round3_procedures_manual.pdf

Guidance on Potential Data and Information That Can Be Used To Assess Systemic Factor Functioning: https://www.acf.hhs.gov/sites/default/files/cb/cfsr_round3_guidance_data.pdf

Resources for Part 3: 2020-2024 CFSP Requirements (Section D, #1-6): <https://www.childwelfare.gov/topics/management/reform/cfsp/sectiond1-3>

Child and Family Services Review Technical Bulletin #7: <https://www.acf.hhs.gov/cb/resource/cfsr-technical-bulletin-7>

State and Tribal Child and Families Services Plan: <https://www.acf.hhs.gov/cb/programs/state-tribal-cfsp>

Strategic Planning in Child Welfare: Strategies for Meaningful Stakeholder Engagement: <https://capacity.childwelfare.gov/states/focus-areas/cqj/strategic-planning>

Supplemental for the Child and Family Services Reviews Stakeholder Interview Guide: <https://www.acf.hhs.gov/cb/resource/cfsr-stakeholder-interview-guide-supplemental>

Title IV-B and IV-E plan requirements (in the Child Welfare Policy Manual): https://www.acf.hhs.gov/cwpm/public.html/programs/cb/laws_policies/laws/cwpm/policy_dsp.jsp?citID=122

Title IV-B Child and Family Service Plan (ACYF-CB-PI-14-03), March 5, 2014: <http://www.acf.hhs.gov/sites/default/files/cb/pi1403.pdf>