



## DEPARTMENT OF HEALTH & HUMAN SERVICES

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ADMINISTRATION FOR CHILDREN AND FAMILIES  
Administration on Children, Youth and Families  
330 C Street, S.W.  
Washington, D.C. 20201

September 17, 2018

Tom C. Rawlings  
Interim Director  
Division of Family and Children Services  
2 Peachtree Street  
Atlanta, Georgia 30303

Dear Judge Rawlings:

This correspondence is a response to Georgia's September 7, 2018, request to renegotiate the state's Child and Family Services Review (CFSR) Program Improvement plan (PIP). In accordance with guidelines specified in 45 CFR 1355.35(a) the PIP was developed to address the seven CFSR outcomes and five systemic factors identified as out of substantial conformity following the April 1, 2016 – September 30, 2016 CFSR review period. The resulting PIP was approved by the Administration for Children and Families (ACF) effective June 1, 2017, with a negotiated implementation start date of April 1, 2017.

As agreed upon, Georgia has been submitting quarterly progress reports to the Children's Bureau (CB), the most recent submission being the fifth quarter report received on September 7, 2018. The CB responses below to requests for renegotiation are based on progress to date, and discussions with the state regarding successes, barriers, and data trends.

### **Renegotiation Request for changes in key activities:**

1. **Goal III, Strategy I, Key activity 11** – The state has requested to amend this step to the following:

*Georgia will conduct quarterly statewide, local or state level meetings with CIP staff to ensure their awareness of updates to policies, implementation of best practices and relevant data related to permanency, and utilize collaboration with CIP to address legal barriers to permanency.*

The CB has had numerous conversations with Georgia regarding the decline in permanency outcome measures, as well as, provided written feedback articulating concerns identified through the state's case review process. We do not believe that the state's request to amend this step will adequately focus on these problems in practice and performance, but will agree to the change the state has requested. Although not included in the request, we urge Georgia to utilize the information available and focus interventions in problem areas listed in my letter of July 6, 2018.

2. **Goal III, Strategy I, Key Activities 1 and 2** – the state has requested to amend these steps to the following:

- a. *Key Activity 1: Georgia's Data Team each month will create lists from SHINES that identify cases where data is missing or lacks quality for the following areas:*
  - *Demographics*
  - *Person Characteristics*
  - *Legal Status*
  - *Placements*
- b. *Key Activity 2: The Data Integrity Specialists will work to ensure that corrections are made through working with the case manager to provide training or a solution to a system problem. At the end of each month those cases on the list will be accounted for – corrected or awaiting a data fix.*

The CB approves the requested change to the PIP regarding these two key activities.

In addition to the above three key activities, your letter listed an additional four that the state has decided to withdraw requests for renegotiation. However, the state provided attachments to the letter describing the current work being done to address deficits seen in the data and concerns raised by CB staff. We remain concerned that Georgia has chosen not to address areas related to safety, permanency, and well-being by modifying the PIP in more depth and hope that the state will focus appropriate interventions in these areas outside of the PIP. The state will need to memorialize the approved renegotiations in the quarter six progress report following instructions previously provided.

The CB remains committed to assisting Georgia in addressing key practice areas of the PIP that do not appear to be having the desired effect in supporting the achievement of improved practice and the subsequent upward trend in measurement data. For questions or concerns please contact Shalonda Cawthon, Regional Program Manager, [shalonda.cawthon@acf.hhs.gov](mailto:shalonda.cawthon@acf.hhs.gov) or by phone at 404-562-2242. You may also contact Tracy Fava, Children and Family Program Specialist, [tracy.fava@acf.hhs.gov](mailto:tracy.fava@acf.hhs.gov) or 404-562-2843.

Sincerely,



Jerry Milner  
Associate Commissioner  
Children's Bureau

cc: Keith Bostick, Director of Child Welfare, DFCS; Atlanta, GA  
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