



DEPARTMENT OF HEALTH & HUMAN SERVICES

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

July 6, 2018

Virginia Pryor, Director
Division of Family and Children Services
2 Peachtree Street
Atlanta, GA 30303

Dear Director Pryor:

This correspondence is a response to Georgia's June 22, 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 fourth quarter report received on May 25, 2018. The state and the CB have had regular calls and/or meetings in response to each of the first three reports to discuss progress in meeting the terms and conditions of the PIP. 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.

1. Renegotiation Request for ongoing training and monitoring activities related to improving education outcomes to be moved into the CFSP/APSRS for ongoing reporting:

- a. **Goal II, Strategy II, Key Activities 1, 2, 3**
- b. **Goal II, Strategy III, Key Activity 1**
- c. **Goal II, Strategy IV, Key Activity 1**

CB agrees with moving these activities into the CFSP. The state has demonstrated adequate progress in implementing these training and monitoring activities during the first year of the PIP.

2. Renegotiation Request for implementation of permanency roundtables to be moved into the CFSP/APSRS due to inadequate time for implementation during the PIP:

- a. **III, Strategy 1, Key Activities 7, 8 and 9** - CB agrees with removing permanency roundtables from the PIP as Georgia does not have the infrastructure in place to support implementation and additional work in the PIP. The CB has recommended to support more focused strategies aimed at achieving timely permanency.

3. Renegotiation Request/Quarter 4 update request for date extensions:

- a. **Goal I, Strategy II, Key Activity 4** – CB does not agree with this request as substantial work is needed to modify the activities in Strategy II to improve safety outcomes, rather than just extending this due date. See additional comments in number 5 below.

- b. **Goal II, Strategy I, Key Activities 2 and 3** – CB agrees with this request as significant work has been completed for both steps.
- c. **Goal II, Strategy IV, Key Activity 3** – CB does not agree with this request as Georgia indicated in the Q4 report that they will distribute the significant health conditions report, monitoring report, and new reporting protocol on June 10, 2018. It appears the state is on track with implementing the use of these reports in subsequent activities that will continue through Q8 of the PIP, so no extension is required.
- d. **Goal IV, Strategy I, Key Activity 1** – CB agrees with this request as the Q4 report indicates the state has completed the redesign of the curriculum and training is being implemented.
- e. **Goal V, Strategy III, Key Activity 2** – CB does not agree with this request as the Q4 report indicates that the state has already received a draft report from the Chapin Hall Study of GA's placement operations and that recommendations are already being discussed. The CB does not agree with an extension to Q8 as that will not allow any time for anything to be accomplished with the results of the study during the PIP period, as follow up activities were slated for Q7 and Q8. This strategy was intended to address concerns with placement stability, particularly the practice of placing children in hotels due to lack of resources, and achieving permanency for children. Although the state has met the PIP goals for items 4 (85.1%) and 6 (37.2%), Georgia still has tremendous progress to make in ensuring that children have stable and appropriate placements and achieve timely permanency. Therefore, we strongly encourage Georgia to consider needed modifications to their placement operations and begin implementation of system improvements as soon as possible.

4. Renegotiation Request for changes in key activities:

- a. **Goal II, Strategy III, Key Activity 2** – CB agrees with the request to remove “in partnership with CASA” from the key activity due to capacity limitations with the CASA program. CB believes the intent of the activity can still be maintained with this change, in support of successful implementation of the strategy.
- b. **Goal III, Strategy I, Key Activity 5** – CB agrees with aspects of this request but suggests some modifications. Although CB accepts a change in the activity to include additional staff (those higher than supervisors) beyond Permanency Field Program Specialists (FPS) in conducting case consultations for children who have reached 12 (rather than 13) months in care, the proposed language does not clearly articulate a sound implementation plan for this activity that follows the training that was completed to support this activity in step 4. Georgia still has not met the PIP goal for item 5 which is trending down in performance. Georgia's data also indicates concerns in achieving strong outcomes in Permanency 2 which was intended to be addressed by this strategy; therefore, CB cannot support an extension for this activity until Q7. CB encourages the state to develop an effective and sustainable implementation plan for this activity and begin the work as quickly as possible to support appropriate permanency planning for children. GA may want to consider an implementation plan that targets regions that are particularly struggling in achieving P1 and P2 outcomes.
- c. **Goal III, Strategy I, Key Activity 11** – In light of Georgia's declining performance in achieving permanency and well-being outcomes, CB does not agree with the request to slightly modify the language to reflect state activities with CIP. Rather, CB recommends that the state agency and CIP utilize the permanency data that is currently available to identify focused strategies that target key court and agency practices that must be improved to facilitate timely permanency and support the well-being of families. For example, GA's data analysis indicated the following contributing factors to lack of timely permanency:

- *Issues most frequently identified as negatively impacting achievement of permanency included **delays or failure to provide needed services to families** to achieve permanency timely, **failure to file for TPR timely** resulting in adoption not being achieved within 24 months, **having concurrent permanency plans with only one plan being worked**, and **insufficient contacts with parents and/or service providers** to facilitate and support progress on reunification cases. Some regions also reported **court delays** as a contributing factor in failure to achieve permanency goals timely. Of particular concern, there were ten cases reviewed in which **children were free for adoption or became free for adoption during the period under review**, and **there was little progress being made towards that goal** (seeking adoptive home, referral for and completing Child Life History, etc.) (GA trend report April-Sept 2017).*
- d. **Goal III, Strategy I, Key Activities 1 and 2** – CB does not agree with the current request as stated, however CB agrees with a modification to these steps to support a more efficient process. More detail is needed to understand how the suggested change will be implemented (how will automated data quality reports be used, who will track needed corrections, etc.) in order for the request to be approved.
- e. **Goal V, Strategy I, Key Activity 2** - CB agrees with the request to limit the amount of staff that complete the training during the PIP period, due to staffing limitations. GA's plan, outlined in the Q4 report, for supplementing staff shortages through train-the-trainer methods supports sustainability in implementing the training.
- f. **Goal V, Strategy III, Key Activity 3** – CB does not agree with this request. Since a draft report is already available we encourage GA to determine what steps can be taken in the remaining PIP period to implement changes. GA has not recommended any changes to activity 4 and CB recommends that step be utilized to complete activities 2 and 3 of Strategy III in the PIP. See comments on related step in 3e above.

5. Quarter 4 requests and CB recommendations based on current status of PIP implementation and PIP measurement:

- **Goal I, Strategy I and II** – Georgia indicated in the Q4 report that these strategies have not adequately improved safety practice and item 2 and 3 data is trending downward, requiring a course correction. However, Georgia has not submitted a renegotiation or offered any additional strategies that will be implemented to improve safety practice. Q4 update also notes concern with implementation of several key activities in these strategies. CB offered several recommendations for strengthening safety practice, including the following:
 - Staff indicated that ISA training was helpful and supports better quality assessment of safety that is not just incident driven, however staff are struggling to adjust to the new practice. Staff also indicated that high

caseloads from intake (including a high number of inappropriately assigned cases) are impacting their ability to conduct quality assessments as they are pushed to get things done quickly. CB strongly encouraged the State to prioritize a review of intake procedures and data related to intakes and subsequent investigations/assessments to assess whether changes should be made for intake screening as this is having an impact on workload, which will impact workforce stability, as well as an impact on quality casework. Most recent NCANDS report indicates that GA screens in 76% of all referrals, the 6th highest percentage in the nation.

During discussions with Georgia, CB outlined key practices that should be expected with the appropriate use of Safety Resources and encouraged the state to consider what is needed to ensure these key practices are occurring in year 2 of the PIP. CB recommended that court related barriers to these practices should be clearly identified and addressed. CB is concerned that the regional safety action plans that Georgia recently implemented are not adequately addressing barriers either.

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, at Shalonda.cawthon@acf.hhs.gov or by phone at 404-562-2242. You may also contact Tracy Fava, Children and Family Program Specialist, t tracy.fava@acf.hhs.gov or 404-562-2843.

Sincerely,



Jerry Milner
Associate Commissioner
Administration for Children and Families

Enclosure

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