#### Handouts for the Webinar

# The Child and Family Services Review and Program Improvement Plan: What's Ahead for NC?

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# Child and Family Services Reviews Quick Reference Items List

#### **OUTCOMES**

#### Safety Outcome 1: Children are, first and foremost, protected from abuse and neglect.

Item 1: Were the agency's responses to all **accepted child maltreatment reports initiated**, and **face-to-face contact** with the child(ren) made, within time frames established by agency policies or state statutes?

# Safety Outcome 2: Children are safely maintained in their homes whenever possible and appropriate.

- Item 2: Did the agency make concerted efforts to provide services to the family to **prevent** children's **entry into foster care or re-entry** after reunification?
- Item 3: Did the agency make concerted efforts to **assess and address the risk and safety** concerns relating to the child(ren) in their own homes or while in foster care?

#### Permanency Outcome 1: Children have permanency and stability in their living situations.

- Item 4: Is the child in foster care in a **stable placement** and were any changes in the child's placement in the best interests of the child and consistent with achieving the child's permanency goal(s)?
- Item 5: Did the agency establish **appropriate permanency goals** for the child in a **timely manner?**
- Item 6: Did the agency make concerted efforts to achieve reunification, guardianship, adoption, or other planned permanent living arrangement for the child?

# Permanency Outcome 2: The continuity of family relationships and connections is preserved for children.

- Item 7: Did the agency make concerted efforts to ensure that **siblings in foster care are placed together** unless separation was necessary to meet the needs of one of the siblings?
- Item 8: Did the agency make concerted efforts to ensure that **visitation between a child in foster** care and his or her mother, father, and siblings was of sufficient frequency and quality to promote continuity in the child's relationships with these close family members?
- Item 9: Did the agency make concerted efforts to **preserve the child's connections** to his or her neighborhood, community, faith, extended family, Tribe, school, and friends?
- Item 10: Did the agency make concerted efforts to **place the child with relatives** when appropriate?
- Item 11: Did the agency make concerted efforts to promote, support, and/or maintain **positive** relationships between the child in foster care and his or her mother and father or other primary caregivers from whom the child had been removed through activities other than just arranging for visitation?

#### Well-Being Outcome 1: Families have enhanced capacity to provide for their children's needs.

- Item 12: Did the agency make concerted efforts to assess the needs of and provide services to children, parents, and foster parents to identify the services necessary to achieve case goals and adequately address the issues relevant to the agency's involvement with the family?
- Item 13: Did the agency make concerted efforts to involve the **parents and children** (if developmentally appropriate) **in the case planning** process on an ongoing basis?
- Item 14: Were the **frequency and quality of visits between caseworkers and child(ren)** sufficient to ensure the safety, permanency, and well-being of the child(ren) and promote achievement of case goals?

Item 15: Were the frequency and quality of visits between caseworkers and the mothers and fathers of the child(ren) sufficient to ensure the safety, permanency, and well-being of the child(ren) and promote achievement of case goals?

#### Well-Being Outcome 2: Children receive appropriate services to meet their educational needs.

Item 16: Did the agency make concerted efforts to assess children's educational needs, and appropriately address identified needs in case planning and case management activities?

#### Well-Being Outcome 3: Children receive adequate services to meet their physical and mental health needs.

Item 17: Did the agency address the physical health needs of children, including dental health

Item 18: Did the agency address the **mental/behavioral health needs** of children?

#### SYSTEMIC FACTORS

#### **Statewide Information System**

How well is the **statewide information system** functioning statewide to ensure that, at a Item 19: 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?

#### **Case Review System**

Item 20: 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?

How well is the case review system functioning statewide to ensure that a **periodic review** \*\*Item 21: for each child occurs no less frequently than once every 6 months, either by a court or by administrative review?

How well is the case review system functioning statewide to ensure that, for each child, a \*\*Item 22: 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?

Item 23: How well is the case review system functioning to ensure that the filing of **termination of** parental rights (TPR) proceedings occurs in accordance with required provisions?

Item 24: How well is the case review system functioning 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?

#### **Quality Assurance System**

Item 25: 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?

#### **Staff and Provider Training**

Item 26: 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 Child and Family Services Plan (CFSP) that includes the basic skills and knowledge required for their positions?

- Item 27: 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?
- \*\*Item 28: 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 needed to carry out their duties with regard to foster and adopted children?

#### **Service Array and Resource Development**

- Item 29: 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 Child and Family Services Plan (CFSP)?
  - 1. Services that assess the strengths and needs of children and families and determine other service needs;
  - 2. Services that address the needs of families in addition to individual children in order to create a safe home environment:
  - 3. Services that enable children to remain safely with their parents when reasonable; and
  - 4. Services that help children in foster and adoptive placements achieve permanency.
- Item 30: 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?

#### **Agency Responsiveness to the Community**

- Item 31: How well is the agency responsiveness to the community system functioning statewide to ensure that, in implementing the provisions of the Child and Family Services Plan (CFSP) and developing related Annual Progress and Services Reports (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?
- Item 32: How well is the agency responsiveness to the community system functioning statewide to ensure that the state's services under the Child and Family Services Plan (CFSP) are coordinated with services or benefits of other federal or federally assisted programs serving the same population?

#### Foster and Adoptive Parent Licensing, Recruitment, and Retention

- \*\*Item 33: 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 child care institutions receiving title IV-B or IV-E funds?
- Item 34: 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?
- Item 35: 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?
- Item 36: 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?

### DRAFT – SUMMARY FOR CFSR/PIP WEBINAR 06/21/16 – DRAFT

Below is table that serves as a quick reference for which strategies will address the areas identified in the CFSR as needing improvement.

Goal 1: Improve the outcomes of safety, permanency and well-being through the establishment of clear				
perf	performance expectations for practice in CPS Assessments, In-Home services and Foster Care services			
1.1	POLICIES AND PRACTICES	Items 1-3, 7-18, 20, 34 and 36		
1.2	TRAINING	Items 1-3, 7-18, 20, 26, 27, 34 and 36		
1.3	SUPERVISOR ACADEMY	Items 1-3, 7-18, 20, 26, 27, 34 and 36		
1.4	TECHNICAL ASSISTANCE MODEL/POLICIES	Items 1-3, 7-18, 34 and 36		
1.5	PARENT MODEL	Items 7-12, 15 and 31		
Goal	2: Improve the outcomes of safety, perman	ency and well-being through the utilization of a statewide		
	•	strengths and needs of the service delivery system		
2.1	QUALITY ASSURANCE/OSRI	Items 1-18 and 25		
2.2	TECHNICAL ASSISTANCE MODEL/OSRI	Items 1-18 and 25		
Goal	3: Improve the permanency outcomes for cl	nildren through collaboration with the judicial system		
3.1	PERMANENCY PROFILE	Items 4, 5, 6, 20, 23 and 24		
3.2	COURT ENGAGEMENT	Items 4, 5, 6, 20, 23 and 24		
3.3	GUARDIANSHIP ASSISSTANCE PROGRAM	Items 4, 5 and 6		
Goal	Goal 4: Strengthen cross-system service provision to improve safety, permanency and well-being			
	omes for children and families			
4.1	DSS/MCO SERVICE COLLABORATION	Items 4, 12, 18, 29 and 30		
4.2	FOSTER/ADOPTIVE PARENT RECRUITMENT	Item 35		
4.3	CFSP/APSR/PIP ENGAGEMENT	Items 31 and 32		
Goal	5: Enhance the statewide data quality, colle	ction and dissemination of information regarding services		
	provided			
5.1	AFCARS	Item 19 (and CFSR Data Indicators)		
5.2	NCFAST	Items 19 and 25		
5.3	CW ASSIST	Items 2, 3 and 12		

Goal 1: Improve the outcomes of safety, permanency and well-being through the establishment of clear performance expectations for practice in CPS Assessments, In-Home services and Foster Care services (Safety 1, Safety 2, Permanency 2, Well-Being 1, Well-Being 2, Well-Being 3, Staff and Provider Training and Case Review System, Agency Responsiveness to Community and Foster and Adoptive Parent Licensing, Recruitment and Retention)

#### Strategies/Activities:

1. Strengthen and clarify North Carolina's child welfare policies and practices [based on support received from the Capacity Building Center] (Items 1-3, 7-18, 20, 34 and 36)

a.	<ul> <li>Review, assess, and revise the current policies and practices including, but not limited to, frequency, consistency, quality and documentation of:</li> <li>timely initiations of child protective services;</li> <li>risk assessments that inform safety plans and services;</li> <li>involve children, parents and foster parents in needs assessments and identification of and securing the appropriate services (including educational, physical, dental and mental health services);</li> <li>meaningful engagement of children, parents and foster parents in the development of case plans;</li> <li>child, family, siblings and caseworker visits that reinforce the continuity and connections of family relationships;</li> <li>case decision making including case closures</li> </ul>	Begin Date: Q1 Completion Date: Q2
b.	Publish the revised manuals governing child welfare policies and practices	Begin Date: Q1 Completion Date: Q3
C.	Assess and develop capacity for implementation of the revised policies and practices in the 10 OSRI counties	Begin Date: Q2 Completion Date: Q3
d.	Pilot the revised policies, practices and training in the 10 OSRI counties	Begin Date: Q3 Completion Date: Q4
e.	Incorporate lessons learned from the pilot in the 10 OSRI counties and develop a plan for the statewide implementation of the revised policies and practices	Begin Date: Q4 Completion Date: Q5
f.	Develop and execute a statewide communication plan regarding the revised policies and practices	Begin Date: Q4 Completion Date: Q5
g.	Execute the statewide implementation plan for the revised policies and	Begin Date: Q5
	practices	Completion Date: Q7

2. Enhance the training system to support the consistent application of the revised policies and practices [based on technical assistance received from the National Child Welfare Workforce Institute and the Capacity Building Center] (Items 1-3, 7-18, 20, 26, 27, 34 and 36)

a.	Identify the key competencies necessary for the revised policies and practices and compare to current curricula for initial and ongoing training to identify gaps	Begin Date: Q1 Completion Date: Q2
b.	Revise the training curricula and delivery methodology based on the gaps assessment to include the competencies necessary to ensure staff have the basic skills necessary to do their work	Begin Date: Q1 Completion Date: Q4
C.	Strengthen the transfer of learning model for all curricula and mandate the utilization of the transfer of learning tool for county staff to ensure the social work competencies identified in the revised policies and practices are implemented consistently after staff attend training	Begin Date: Q1 Completion Date: Q4
d.	Develop a series of "in-service" trainings (examples include scripted PowerPoints, webinars, role play scenarios, videos, etc.) to be used by county supervisors and training divisions to reinforce consistent implementation of the revised policies and practices	Begin Date: Q2 Completion Date: Q5

3. Strengthen the capacity of county departments of social services to sustain the consistent application of the revised policies and practices through the development and implementation of a supervisor academy (Items 1-18, 20, 26, 27, 34 and 36)

a.	Identify the supervisor competencies necessary to support the consistent	Begin Date: Q1
	implementation of the revised policies and practices	Completion Date: Q2
h	Davidon the supervisor academy based on identified competencies	Begin Date: Q1
b.	Develop the supervisor academy based on identified competencies	Completion Date: Q3
c.	Implement a pilot for the supervisor academy beginning with select	Begin Date: Q4
	supervisors in the 10 OSRI counties	Completion Date: Q6
d.	Incorporate lessons learned from the 10 OSRI counties and develop a plan	Begin Date: Q7
	for the statewide use of the supervisor academy using a regional approach	Completion Date: Q8
e.	Develop and execute a statewide communication plan regarding the	Begin Date: Q6
	supervisor academy	Completion Date: Q6
f.	Use data from supervisor academy graduates to evaluate the supervisor	Begin Date: Q6
	academy	Completion Date: Q8

4. Strengthen and implement a technical assistance model for NC DSS to provide support to county staff regarding the consistent application of the revised policies and practices [based on technical assistance received from the Capacity Building Center] which will clarify the roles and responsibilities of both state and county staff (Items 1-18, 34 and 36)

a.	Assess the current technical assistance model to support the consistent	Begin Date: Q1
	implementation of the revised policies and practices	Completion Date: Q2
b.	Revise the technical assistance model based on the assessment	Begin Date: Q2
D.	nevise the technical assistance model based on the assessment	Completion Date: Q3
	Document the revised North Carolina technical assistance model	Begin Date: Q3
C.	Document the revised North Carolina technical assistance moder	Completion Date: Q3
d.	Develop and pilot an implementation plan for the revised technical assistance model beginning in the 10 OSRI counties to identify additional	Begin Date: Q4
	gaps and/or areas that need to be strengthened	Completion Date: Q5
e.	Incorporate lessons learned from the 10 OSRI counties and execute the implementation plan for the technical assistance model using a regional approach to support the consistent use of the revised policies and practices	Begin Date: Q5 Completion Date: Q8
f.	Develop and execute a statewide communication plan regarding the	Begin Date: Q6
	technical assistance model	Completion Date: Q7
g.	Expand and utilize the TA Gateway to support the consistent application of	Begin Date: Q3
	the technical assistance model	Completion Date: Q8

5. Develop and implement a state level child welfare parent leadership model which will provide parent "voice" to inform state plans [CBCAP, CFSP/APSR, CAPTA], policies and practices [based on support received from FRIENDS: Family Resource Information, Education and Network Development Services - the National Center for Community Based Child Abuse Prevention, and the Capacity Building Center for States] (Items 7-12, 15 and 31)

a.	Review available parent leadership strategies and adopt/adapt components	Begin Date: Q1
	as needed	Completion Date: Q2
b.	Conduct a readiness assessment for the state to implement a parent	Begin Date: Q2
	leadership model	Completion Date: Q3
c.	Formalize the support mechanisms for parent leadership engagement and	Begin Date: Q3
	create a North Carolina Child Welfare Parent Advisory Council	Completion Date: Q4
d.	Engage the NC Child Welfare Parent Advisory Council on the Community	
	Child Protection Team Advisory Board, policy development workgroups,	Begin Date: Q4
	and other opportunities to support practice changes that promote family	Completion Date: Q8
	engagement	

Goal 2: Improve the outcomes of safety, permanency and well-being through the utilization of a statewide quality assurance system which will identify the strengths and needs of the service delivery system (Safety 1, Safety 2, Permanency 1, Permanency 2, Well-Being 1, Well-Being 2, Well-Being 3 and Quality Assurance)

#### Strategies/Activities:

1. Operationalize the state level quality assurance system so that areas of child welfare practice needing improvement are consistently identified and addressed (Items 1-18 and 25)

a.	Develop and execute a statewide communication plan regarding the quality	Begin Date: Q1
	assurance system based on the use of the OSRI	Completion Date: Q2
b.	Develop and record a webinar to orient all county departments of social	Begin Date: Q3
	service staff to the North Carolina process for use of the OSRI	Completion Date: Q3
c.	State staff will provide <i>Quality Assurance</i> oversight to the staff in the 10 OSRI	Begin Date: Q1
	counties who will review 113 cases (50 In-Home and 63 Foster Care each	Completion Date: Q12
	year) using the OSRI as outlined in the "North Carolina Measurement Plan"	Completion Date. Q12
d.	State staff with review a random sample of 100 cases from the remaining 90	Begin Date: Q1
	counties (44 In-Home and 56 Foster Care each year) using the OSRI as	Completion Date: Q12
	outlined in the "North Carolina Measurement Plan"	Completion Date. Q12

2. Develop the protocol and processes by which quality assurance results will be analyzed and program improvement will be implemented and evaluated statewide (Items 1-18 and 25)

a.	Explore other county-administered states technical assistance/support	Begin Date: Q1
	models to inform development	Completion Date: Q2
b.	Clarify how counties' support needs will be determined and how the state will assist counties with item-specific analysis of the case review findings and addressing any identified needs	Begin Date: Q3 Completion Date: Q5
C.	Incorporate lessons learned from strengthening the technical assistance model (Goal 1.4) to develop business processes across NC DSS' child welfare teams	Begin Date: Q5 Completion Date: Q8
d.	Develop and execute a statewide communication plan to disseminate	Begin Date: Q5
	technical assistance/support activities, protocols and processes	Completion Date: Q8

# Goal 3: Improve the permanency outcomes for children through collaboration with the judicial system (Permanency 1, Case Review System)

#### Strategies/Activities:

1. Develop with NC AOC and other judicial system partners a plan to engage local court and DSS to address issues of: notice to resource parents, timely establishment of case goals, concurrent planning, permanency and timely TPR actions (Items 4, 5, 6, 20, 23 and 24)

a.	Utilize OSRI findings from OMS reports, CFSR data indicators and CIP	Begin Date: Q2
	measures to develop a "permanency performance profile"	Completion Date: Q3
b.	Publish state, county and judicial district level "permanency performance profiles" for key court personnel, county staff, GAL Community, and other key stakeholders to encourage increased collaboration around improving data quality and permanency outcomes	Begin Date: Q3 Completion Date: Q8
C.	State DSS and NC AOC staff will facilitate regularly occurring local meetings to review the "permanency performance profile" and develop specific strategies to improve performance	Begin Date: Q3 Completion Date: Q8

2. NC DSS, Indigent Defense Services, Guardian ad Litem and the Court Improvement Program will provide targeted engagement to county department of social services and court personnel in judicial districts and counties across the state to support children achieving permanency and stability in their living situations (Items 4, 5, 6, 20, 23 and 24)

a.	Develop plan with NC AOC and other judicial system partners to provide technical assistance to improve permanency outcomes to counties and judicial districts not meeting performance standards	Begin Date: Q1 Completion Date: Q4
b.	Provide consultation and support to county departments of social services and judicial districts where data indicates children are not achieving permanency as outlined in the "permanency performance profile"	Begin Date: Q3 Completion Date: Q8
C.	Develop opportunities for collaboration and customized training for social services staff and court personnel in judicial districts where data from the "permanency performance profile" indicates children are not achieving permanency	Begin Date: Q5 Completion Date: Q7
d.	Evaluate the effectiveness and impact of the consultation and training provided as measured by changes in the "permanency performance profile"	Begin Date: Q6 Completion Date: Q8

3. Implement a Guardianship Assistance Program for all counties in North Carolina, pending approval by the rules process, to support permanency and stability in children's living situations (Items 4, 5 and 6)

a.	Propose administrative rules to govern the use of Guardianship Assistance	Begin Date: Q1
	Program funds	Completion Date: Q2
h	Publish notice for implementation of the Cuardianship Assistance Brogram	Begin Date: Q2
b.	Publish policy for implementation of the Guardianship Assistance Program	Completion Date: Q2
c.	Develop and provide training to county and court personnel on the	Begin Date: Q3
	application of the Guardianship Assistance Program	Completion Date: Q8
al lucandon	Implement the Guardian Assistance Program statewide	Begin Date: Q3
d.		Completion Date: Q6
e.	Review performance data on the Guardian Assistance Program to ensure	Begin Date: Q4
	that it is operating in accordance with rules and policies	Completion Date: Q8

Goal 4: Strengthen cross-system service provision to improve safety, permanency and well-being outcomes for children and families (Permanency 1, Well-Being 1, Well-Being 3, Service Array and Resource Development, Agency Responsiveness to Community, and Foster and Adoptive Parent Licensing, Recruitment and Retention)

#### Strategies/Activities

1. Establish expectations for serving children and families involved with child welfare programs and services with Local Management Entities/Managed Care Organizations (LME/MCO) agencies to support the best interests of families and children and to achieve their case goals (Items 4, 12, 18, 29 and 30)

a.	Develop performance standards (regarding timely referral for services, assessments, timely initiation and authorization of services, individualized service planning, progress on service provision, and cross catchment area service provision) between County DSS and LME/MCO entities and identify any unmet needs or gaps in service array	Begin Date: Q1 Completion Date: Q6
b.	Develop written agreements regarding performance standards	Begin Date: Q1 Completion Date: Q6
C.	Develop tracking protocols for the agreed upon performance standards as outlined in the written agreement that each county DSS will maintain	Begin Date: Q5 Completion Date: Q6
d.	Disseminate information of performance standards to include, but not limited to, timely service provision, permanency measures, placement stability, and behavioral health outcomes	Begin Date: Q5 Completion Date: Q7
e.	NC DHHS will provide consultation to county departments of social services and LME/MCOs where agreed upon performance standards to improve outcomes for children are not being achieved	Begin Date: Q5 Completion Date: Q8

2. Strengthen and reframe the statewide foster and adoptive parent diligent recruitment plan to support the recruitment of families who meet the needs of the children they serve and who reflect the ethnic and racial diversity of children served by the Foster Care program (Item 35)

a.	Utilize the support from the National Resource Center for Diligent Recruitment and all available data resources to improve the statewide recruitment plan	Begin Date: Q1 Completion Date: Q2
b.	Develop and execute a communication plan regarding the improved diligent recruitment plan to all county departments of social services and private child placing agencies	Begin Date: Q3 Completion Date: Q3
C.	State staff will implement key strategies in the improved diligent recruitment plan to recruit families who reflect the diversity of children served by the foster care program and who can meet their physical, mental and behavioral needs	Begin Date: Q3 Completion Date: Q8
d.	Provide training on, review and monitor county departments of social services' annual Multi-Ethnic Placement Act (MEPA) plans to ensure they reflect the ethnic and racial diversity of children for whom foster and adoptive homes are needed in their county	Begin Date: Q5 Completion Date: Q8

3. Strengthen the external stakeholders understanding of, and input into the development of, the North Carolina Child and Family Services Plan (CFSP) and Annual Progress and Services Report (APSR) goals, objectives and annual updates and establishing ongoing feedback mechanisms (Items 31 and 32)

a.	Develop a recorded presentation for external stakeholders regarding the CFSP/APSR and PIP to strengthen their understanding of the goals and objectives and opportunities for ongoing engagement	Begin Date: Q1 Completion Date: Q4
b.	Consult with foster, adoptive, and kinship parents regarding the CFSP/APSR and PIP utilizing the "Resource Parent Portal" to identify and address any major concerns and engage them in the implementation of the provisions outlined in the CFSP	Begin Date: Q1 Completion Date: Q6
c.	Consult with external stakeholders regarding the CFSP/APSR and PIP in cross systems meetings (such as Court Improvement Program's Interagency collaborative, SAYSO Saturday, EBCI meeting, Child Welfare Parent Advisory Council, CCPT Advisory Council, Benchmarks FAR, FFTA, etc.) to identify and address any major concerns and engage them in the implementation of the provisions outlined in the CFSP	Begin Date: Q1 Completion Date: Q8
d.	Consult with internal stakeholders regarding the CFSP/APSR and PIP at six quarterly regional county DSS meetings to identify and address any major concerns and engage them in the implementation of the provisions outlined in the CFSP	Begin Date: Q1 Completion Date: Q8
e.	Consult with internal stakeholders regarding the CFSP/APSR and PIP at the annual Social Services Institute to identify and address any major concerns and engage them in the implementation of the provisions outlined in the CFSP	Begin Date: Q2 Completion Date: Q6
f.	Engage internal and external stakeholders in "Listening Sessions" to identify issues and concerns related to serving children and families involved in child welfare to inform the development of a Child Welfare Strategic Plan	Begin Date: Q3 Completion Date: Q8

# Goal 5: Enhance the statewide data quality, collection and dissemination of information regarding services provided (Safety 1 Data Indicator; Safety 2; Permanency 1 Data Indicator; Well-Being 1; Statewide Information System; Quality Assurance System)

#### Strategies/Activities

1. Resubmit AFCARS (Adoption and Foster Care Analysis and Reporting System) files from 2013 forward, so that North Carolina is able to meet data quality standards (CFSR Data Indicators, Item 19)

a.	Develop an algorithm to identify duplicate Services Identification	Begin Date: Q1
	System (SIS) numbers	Completion Date: Q2
h	Apply algorithm and conduct data varification by local staff	Begin Date: Q3
b.	Apply algorithm and conduct data verification by local staff	Completion Date: Q3
c.	Adjust algorithm, if necessary, and resubmit the AFCARS files with	Begin Date: Q4
	unduplicated identifiers in accordance with CB instructions	Completion Date: Q4
d.	Develop ongoing process for the identification of duplicate child	Begin Date: Q5
	identifiers prior to future AFCARS submissions	Completion Date: Q5

2. Strengthen the statewide information system through the development of a child welfare module within NC FAST (North Carolina Families Accessing Services through Technology) to improve data quality, consistency, and access to timely statewide data (Items 19 and 25)

a.	Conduct an analysis of the current business child welfare service	Begin Date: Q1
	functions against the existing Cúram Software to identify gaps	Completion Date: Q1
b.	Ensure any revisions to the policies and practices regarding CPS Assessment, In-Home and Foster Care are included in the NC FAST business functions	Begin Date: Q1 Completion Date: Q4
C.	Conduct sufficient testing to ensure practice is supported by the software	Begin Date: Q1 Completion Date: Q6

3. Develop and implement the Child Welfare ASSIST (Accessing and Searching Sensitive Information for Safety through Technology) database statewide [using data from NC FAST, the Child Placement and Payment System and others] to ensure that children are thoroughly assessed for risk and safety throughout the life the case (Items 2, 3 and 12)

a.	Outline the necessary data gathering, analysis, design, coding, testing,	Begin Date: Q1
	deployment and maintenance protocols for development	Completion Date: Q2
b.	Verify the data linkages and evaluate the functionality and usability in	Begin Date: Q1
	select counties	Completion Date: Q2
c.	Assess and secure the technical infrastructure needed to support	Begin Date: Q1
	statewide expansion to all 100 counties	Completion Date: Q4
d.	Develop minimum policy expectations for use of Child Welfare ASSIST	Begin Date: Q2
	in all 100 counties	Completion Date: Q6
e.	Develop training materials/protocols and implement use of Child	Begin Date: Q3
	Welfare ASSIST in all 100 counties	Completion Date: Q6



#### **About this webinar**

This webinar was developed through funding from the North Carolina Division of Social Services by the Family and Children's Resource Program, part of the Jordan Institute for Families at the UNC-Chapel Hill School of Social Work





The audience today includes staff from local county departments of social services, but this recording will be shared with stakeholders across our child-serving system.



#### **Goals for this webinar**

By the end of this webinar, we hope you will understand:

- The Child and Family Services Review (CFSR) and Program Improvement Plan (PIP) Process
- The PIP components and how they may help North Carolina achieve better outcomes for children and families
- What you can begin doing today to help correct some of the identified concerns in the CFSR Report
- The relationship between the PIP and the Child and Family Services Plan (CFSP) and the Annual Progress and Services Report (APSR)

#### **Agenda**

- Orientation & Introductions
- Background and Context for the CFSR
- CFSR Results & Context for the PIP
- Process for Developing the PIP
- PIP Goals/Strategies/Activities
- What Does this Mean for Me and My Agency?
- What You Can Do Today to Help
- Questions and Answers



#### A Special Note About Questions

- We will monitor questions via the chat box and answer them as possible throughout the webinar
- There will also be a <u>follow-up document</u> developed that will include answers to questions asked during this webinar (which will be e-mailed to all registered participants and posted with the webinar recording)
- The recorded webinar will reside on the Family and Children's Resource Program webpage (http://fcrp.unc.edu/webinars.asp)



#### **Panelists**

Kevin Kelley
Kristin O'Connor
Shelia Stokes



Laura Phipps



#### Tech Support

Phillip Armfield John McMahon

#### The Big "Child Welfare" Picture

#### Five Year Strategic Plan

Child and Family Services Plan (CFSP) https://www2.ncdhhs.gov/dss/stats/cw.htm Annual Progress and Services Report (APSR)

#### Federal Review Process

Child and Family Services Review (CFSR) Program Improvement Plan (PIP)



#### **Child and Family Services Review (CFSR)**

- Collaborative effort between federal and state governments
- Promotes continuous quality improvement in child welfare systems nationally
- Identifies areas needing improvement in state child welfare programs
- Enables states to use the information to create strategic plans for improving its child welfare system



#### **Child and Family Services Review (continued)**

- N.C.'s previous reviews were conducted in 2001 and 2007
- The Children's Bureau made several changes to the CFSR process and items and indicators relevant for performance based on lessons learned during the second round of reviews, and in response to feedback from the child welfare field
- As such, a state's performance in the third round of the CFSRs is not directly comparable to its performance in the second round



#### **Child and Family Services Review (continued)**

- The CFSR assesses state performance in regard to seven child and family outcomes and seven systemic factors
- The seven child and family outcomes are around Safety, Permanency, and Well-Being – there are a total of 18 items reviewed (3 Safety items; 8 Permanency items; and 7 Well-Being items)
- Systemic factors look at our system as a whole and there are also 18 items reviewed (just a few are: how we are training staff, how we are providing quality assurance, how we are recruiting foster families)



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#### **Child and Family Services Review (continued)**

- For a state to be in <u>substantial conformity</u> with the seven child and family outcomes (Safety, Permanency, and Well-Being indicators) .... the threshold is high:
  - 95 percent of the applicable cases reviewed must be rated as a strength for each item
  - For Safety 1 and Permanency 1, the state must also meet the national standard data indicators



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#### **Seven Child and Family Welfare Outcomes**

- Safety 1: Children are, first and foremost, protected from abuse and neglect
- Safety 2: Children are safely maintained in their homes whenever possible and appropriate
- Permanency 1: Children have permanency and stability in their living situations
- Permanency 2: The continuity of family relationships and connections is preserved for children



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#### **Seven Child and Family Welfare Outcomes (continued)**

- Well-Being 1: Families have enhanced capacity to provide for their children's needs
- Well-Being 2: Children receive appropriate services to meet their educational needs
- Well-Being 3: Children receive adequate services to meet their physical and mental health needs



#### **Seven Child and Family Welfare Outcomes (continued)**

- We reviewed <u>more cases</u> this CFSR round than in the previous rounds, but it is still a very small sample size compared to the total number of cases in N.C.
- We reviewed cases from <u>more counties</u> than in any other CFSR round as well. Cases were reviewed in Buncombe, Craven, Cumberland, Durham, Hoke, Mecklenburg, Pitt, Scotland, Wake, and Wilson.
- 105 cases (59 foster care and 46 in-home cases) were reviewed between April 1, 2015 and September 30, 2015 using the Children's Bureau's Onsite Review Instrument (OSRI).



#### **Seven Systemic Factors**

- Statewide information system to ensure the state can readily identify the status, demographics, location, and goals for each child in foster care
- <u>Case review system</u> to ensure the agency and courts achieve permanency in a timely manner, and families are engaged in the process
- Quality assurance system statewide to ensure children are provided quality services that protect their health and safety



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#### **Seven Systemic Factors (continued)**

- Staff and provider training ensures staff statewide are properly trained to assess families, and deliver services
- Service array and resource development that is accessible, and appropriate to meet individualized child and family needs
- Agency responsiveness to the community through ongoing consultation with service providers, foster care providers, the juvenile court, and other public and private child and family serving agencies



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#### **Seven Systemic Factors (continued)**

- Foster and adoptive parent licensing, recruitment, and retention system that ensures:
  - state standards are applied consistently;
  - background checks are completed;
  - diligent recruitment occurs that reflects the children in care; and
  - cross-jurisdictional resources are used to facilitate permanence



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#### **The Results**

- We did not obtain substantial conformity for the seven child and family services outcomes or the seven systemic factors.
- There was insufficient data to determine many of the indicators and therefore stakeholder interviews were necessary to gather more information.
- Given we historically did not use the federal language (CFSP, APSR, etc.) with our stakeholders, these interviews were unable to provide a complete picture of many of the state's efforts.



#### The Results

- However, both the stakeholder interviews and the results from the Onsite Review Instrument (OSRI) did highlight several concerns we need to address promptly.
- We will address those concerns through a Program Improvement Plan (PIP) <u>and</u> through activities not included in the PIP.
- The PIP only includes activities that could be completed and measured within a 2-year period.



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#### Let's All Get on the Same Page

#### WHAT THE PIP IS

The PIP is singularly focused on improving the issues that were identified in the CFSR.

The PIP is a great opportunity to align resources, clarify expectations, and create more consistency across our state.

The PIP contains goals, strategies, and activities that we anticipate will improve outcomes for children as measured by the OSRI.

#### WHAT THE PIP IS NOT

The PIP does not contain all of the great activities and innovative ideas that will we will be doing to improve our child welfare system.

The PIP is not the mechanism we will use to address all of the needs we know we want to address in child welfare (practice model. REAP. etc.).

The PIP is not just applicable to the initial OSRI counties (everyone who serves children in North Carolina has a role to play).

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#### **Program Improvement Plan (PIP) Development**

- Development of the plan began prior to the receipt of the final report
- January 11-12, 2016, more than 270 stakeholders and partners attended an event to:
  - Review the report
  - Share observations and thoughts that contributed to the functioning of the system
  - Explore "root causes"
  - Identify opportunities for further exploration of the opportunities and challenges



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#### **Program Improvement Plan Development (continued)**

Five themes were identified and workgroups met in March, 2016

- <u>Court Collaboration</u> Issues to timeliness for hearings, including Termination of Parental Rights
- County Practice Helping front-line social workers identify needs and arrange appropriate services
- System Infrastructure Quality Assurance and management oversight
- <u>Stakeholder Engagement</u> Community responsiveness and special populations
- Service Collaboration Access and effectiveness of behavioral health services, domestic violence services, and parenting supports

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#### **Program Improvement Plan Development (continued)**

- This is a collaborative, negotiated process between the state and the Children's Bureau (CB).
- Because we conducted a state-led review which established the capacity of 10 counties (OSRI Counties) to use the OSRI with fidelity, it is the CB's expectation that we will continue to focus on those 10 counties to help measure improvement.
- Finally, in May 2016, we conducted an online survey to garner feedback from stakeholders regarding the draft plan. This was very beneficial not only to help ensure activities were worded clearly, but helped us see areas where we needed to strengthen the document.

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#### **Themes from Survey**

- Program Improvement Plan implementation activities are very ambitious
- Confusion over the state's technical assistance, quality assurance, and program monitoring activities (how they align, interface, overlap, etc.)
- The limited state office staff to implement and oversee the activities
- Counties are experiencing climbing case loads, "initiative" fatigue, and staff turnover which will make implementation more difficult



#### **Responding to Feedback from Survey**

- NC DSS anticipates getting several new positions to help implement and streamline activities
- We are using the PIP to streamline some of our own internal processes and procedures to reduce confusion and increase efficiencies
- There is synergy among other Departments and Divisions around improving child welfare services
- We hope as we clarify policies, strengthen training, build a supervisory academy, and improve collaboration across systems, the overall impact on county staff (satisfaction and retention) will also improve

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#### **Program Improvement Plan (continued)**

<u>Goals</u> – Broad areas that address the findings in the report, as guided by input from federal staff. The PIP currently has 5 goals.

<u>Strategies</u> – Components that will have a positive impact on the goal area.

The PIP currently has 16 strategies.

<u>Activities</u> – Specific actions with timelines. The PIP currently has 75 activities.



Goal 1: Improve the outcomes of safety, permanency, and well-being through the establishment of clear performance expectations for practice in CPS Assessments, In-Home services and Foster Care services

- 1.1 Policies and Practices
- 1.2 Training
- 1.3 Supervisor Academy
- 1.4 Technical Assistance Model/Policies
- 1.5 Parent Model



Goal 2: Improve the outcomes of safety, permanency, and well-being through the utilization of a statewide	
quality assurance system which will identify the	
strengths and needs of the service delivery system	
2.1 Quality Assurance System/OSRI	
2.2 Technical Assistance Model/OSRI	
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Goal 3: Improve the permanency outcomes for	
children through collaboration with the judicial system	
2.1 Dermananay Profile	
3.1 Permanency Profile	
3.2 Court Engagement	
3.3 Guardianship Assistance Program	
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Goal 4: Strengthen cross-system service provision to	
improve safety, permanency, and well-being outcomes for children and families	
4.1 LME/MCO and DSS Service Collaboration	
4.2 Foster/Adoptive Parent Recruitment	
4.3 CFSP/APSR/PIP Engagement	
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Goal 5: Enhance the statewide data quality, collection and dissemination of information regarding services provided	
5.1 AFCARS	
5.2 NC FAST - Child Welfare Module (P4)	
5.3 Child Welfare ASSIST Implementation	
ASSIST ( <b>A</b> ccessing and <b>S</b> earching <b>S</b> ensitive <b>I</b> nformation for <b>S</b> afety through <b>T</b> echnology)	
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How will the State's Progress	
Be Measured?	
The Future of the OSRI in North Carolina	
213 cases shall be reviewed using the OSRI every year	
for the next three years	-
North Carolina is committed to ongoing use of the OSRI as the foundation of our quality assurance system	
As we move forward beyond the three years, the state staff will help additional counties build the capacity to	
use the measure with fidelity and be able to conduct their own reviews (similar to the 10 initial counties)	
anon own reviews (similar to the 10 initial counties)	

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Findings from 213 cases reviewed each year (for three years)

- 113 cases will be reviewed by the 10 counties who
  participated in the CFSR they will conduct their own case
  reviews using the OSRI and the state staff will provide 2<sup>nd</sup>
  level review.
- 100 cases will be reviewed by the state staff. These cases will be randomly selected from the other 90 counties.
- While a true random sample will probably not reach all 90 counties, every county is eligible for a case to be selected and reviewed.

#### **Measurement Plan**

- Your county may be selected (via random sampling methodology) to have a case reviewed by the state OSRI team. The more data we can collect, the better picture we will have of what is actually happening in North Carolina.
- You will have plenty of notice if your county is selected and plenty of support during the process.
   We'll be helping you interpret the results and help implement any improvements to practice that may be identified.



What Does this Mean for Me and My Agency?

#### Impact on you and your agency

- More focus on safety: safety assessments, safety services, safety plans
- More focus on ensuring practice consistency across the state
- More focus on transfer of learning activities to ensure learning from trainings can be applied to practice
- Use of the Onsite Review Instrument (OSRI) will be the way we measure outcomes – we'll utilize it for practice improvements (not punishment)



#### **Focus Areas**

Safety 1: Children are, first and foremost, protected from harm Safety 2: Children are safely maintained in their home whenever possible and appropriate

- Initiate reports timely and be sure face-to-face contacts are made within established timeframes
- Address the safety concerns that brought the case to your attention as well as any others you identified
- Be sure all safety concerns are addressed prior to case closure



#### **Focus Areas**

Permanency Outcome 2: The continuity of family relationships and connections is preserved for children

- Need improvement on <u>quality</u> and <u>frequency</u> of visits (with mom, with dad, with siblings, with case worker)
- Important to preserve connections even if primary plan is not reunification; promote, support, and/or maintain positive relationships.
- Keep sibling groups together if sibling group of five or more, contact licensing office for possible waiver to rule



#### **Focus Areas**

Well-Being 1: Families have enhanced capacity to provide for their children's needs

- Concerted efforts to assess the needs of and provide services to foster parents (and children/parents)
- · Involve mothers in case planning
- · Involve fathers in case planning
- · Involve youth in case planning
- · Involve non-custodial parents in case planning



#### **Focus Areas**

Case Review System

- Foster, pre-adoptive, and kinship parents notice of, and right to be heard in any review or hearing
- · Timely notification of case planning meetings
- · Involve mothers in case planning
- · Involve fathers in case planning
- · Involve youth in case planning
- Be creative in involving non-custodial parents



Ten Things You Can Start Today That Will Make A Difference

#### Ten Things You Can Do To Make a Difference

- Get familiar with the Child and Family Services Plan (CFSP) if you are not already familiar with it https://www2.ncdhhs.gov/dss/stats/cw.htm
- Make sure all staff have the required training for their roles utilize the "Individual Training Assessment" feature in the "Personalized Learning Portfolio" (PLP) section.
- 3. Use the Supervisor Resource Section of ncswLearn.org to monitor whether or not staff has attended the required training for their position
- Use the 'add a training' feature on ncswLearn.org (PLP in 'Training Attendance History' section) to document additional trainings your staff attends

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#### Ten Things You Can Do To Make a Difference

- If you ever hear someone say in a training "we don't do it like that in our county," please respond "well, we need to" and bring it to the attention of your county's leadership
- 6. Ensure your foster and pre-adoptive parents are getting notices of hearings develop checks and balances for this if not already in place
- 7. Ensure cases are initiated within the policy timeline
- 8. Ensure all issues related to safety have been addressed prior to case closure
- 9. Ensure child/youth is part of case planning
- 10. Ensure the parents are involved in case planning

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#### **Next Steps**

Share the CFSR Handout and Quick Reference List with all of your staff and families to help them understand how the Children's Bureau rates us under the umbrella of Safety, Permanency, and Well-Being, and the Systemic Factors.

Let staff and families know they may be interviewed as part of a case review (using the Onsite Review Instrument or OSRI).



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Beginning June 23, 2016, a recording of this webinar will be available here:

http://fcrp.unc.edu/webinars.asp

Please share this link with stakeholders in your communities and encourage them to watch the recording to help keep them informed.



## **Questions**

### **Contact Information**

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Kristin O'Connor Kristin.Oconnor@dhhs.nc.gov 919-527-6407

Shelia Stokes sstokes@myguilford.com 336-641-6428

#### **Final Steps for DSS Staff**

- 1. Please take a brief survey
  - We will provide link for those logged on
  - Can also access thru ncswlearn.org
- 2. To receive training credit, you must "Complete Course" WITHIN ONE WEEK
  - $\checkmark \ \text{Log in to} \ \underline{\text{www.ncswlearn.org}}$
  - ✓ Select "PLP"
  - ✓ Select "Webinars"
  - ✓ Click "Enter"
  - $\checkmark$  Click "Complete Course" button



Thank you for your participation today.			
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# Follow-up Document from the Webinar

# The Child and Family Services Review and Program Improvement Plan: What's Ahead for NC?

Webinar delivered June 21, 2016 Follow-up document date: June 23, 2016

#### Presenters

Kevin Kelley, Chief Child Welfare Services Section NC Division of Social Services

Kristin O'Connor, Deputy Chief Child Welfare Services Section NC Division of Social Services

Shelia Stokes, QA Training Supervisor

Guilford County Department of Social Services

 $Produced\ by$ Family and Children's Resource Program, part of the Jordan Institute for Families
UNC-Chapel Hill School of Social Work  $Sponsored\ by$ NC Division of Social Services

Recording: if you missed the webinar or want to view it again, go to: http://fcrp.unc.edu/webinars.asp

#### Answers and Resources from the Webinar

#### I. Topic: OSRI/Case Reviews

Will there be more training for use of the CFSR tool to review files (aka, the OSRI, or Onsite Review Instrument)?

The 10 counties that participated in the federal CFSR have been trained in the use of the OSRI. The U.S. Children's Bureau requires the OSRI be implemented with fidelity, therefore specialized training and oversight is required for a county to conduct their own case review using this tool. There is no requirement for the other 90 counties to be fully trained in the OSRI to participate in random case review activities we've described in this webinar. However, it is very important you understand the results. The state team who will conduct the random case reviews will provide consultation regarding the results so your county can address any issues identified.

If your county believes it has the capacity to implement the OSRI with fidelity and would like to do so, please contact Cyndi O'Briant at the Division via e-mail (cynthia.obriant@dhhs.nc.gov).

# Will the cases reviewed (in connection with PIP measurement) be Foster Care and In-Home Cases, plus the underlying CPS Assessments?

The federal protocol requires that foster care and in-home cases be reviewed. During this process, records of CPS assessments will be thoroughly reviewed. However, we do not review individual CPS assessments on their own.

#### Will there be another webinar that focuses on the on-site review instrument?

Yes. We will record a webinar training event to orient everyone to the OSRI. This will be recorded for ongoing viewing (NC's draft PIP Goal 2.1b).

#### 2. Topic: Guardianship Assistance Program

#### When will you have additional information about the Guardianship Assistance Program?

Administrative rules relating to this program will soon be posted for public comment. The Division of Social Services will let counties know as soon as that public comment is open. The NC General Assembly has ordered that program be cost-neutral, which means it will have narrow parameters for eligibility. The anticipated eligibility will be a youth currently placed in a home receiving a board payment, over the age of 14 and where adoption has been ruled out.

As soon as the rules are finalized, the Division will record a webinar and issue policy guidance. It is estimated that this program will begin January 1, 2017.

#### Will the Guardianship Assistance Program apply to in-home services?

No. It will be used only for children currently being served by the foster care program for whom all other avenues to permanency have been ruled out.

#### Where will the funding come from for the Guardianship Assistance Program?

From the foster care budget. This program will serve only children for whom a foster care board payment is already being paid. We have said this program will be cost-neutral, but actually there will be a very small savings, since the county would no longer be required to provide administrative oversight to the family. Under the Guardianship Program, there will be no need for oversight/administrative costs.

# Will the Guardianship Assistance Program requirements be the same as the foster care requirements for licensing?

No. Under the Guardianship Program there won't be a requirement of ongoing licensure unless that guardian chooses to continue as a licensed foster parent providing care for additional non-guardianship children. In this way the Guardianship Assistance Program will resemble Adoption Assistance.

# Do you foresee more children coming into foster care in order to access the Guardianship Assistance Program?

No. This program will be cost-neutral with narrow eligibility requirements. It will be used only for children currently being served by the foster care program for whom all other avenues to permanency have been ruled out.

# Will guardianship payments be issued through the state like Adoption Assistance or tracked and disbursed within the county?

Guardianship Assistance Program payments will be issued by county; the county will then make a claim to the state for the state share of the payment, just as is currently done with foster care board payments.

#### Will guardianship assistance be retroactive or begin at the assigned date?

This program will not be retroactive. The current goal is for this program to be in place beginning January 1, 2017. After that time, any family that meets the criteria would be eligible to 'convert' from a licensed foster home to a guardianship placement.

Will the Guardianship Assistance Program only be applicable for children in foster care placed in licensed foster homes where they are currently having a board rate paid out? What about foster kids that are NOT in licensed homes and therefore there is no board rate being paid?

This program will be cost-neutral, with narrow eligibility requirements. It will only serve children in the homes of licensed caregivers (typically relatives) and for whom foster care board payments are currently being made.

# Would families licensed through the Caring for Our Own kinship licensing program through CHS qualify?

If these families are licensed and payments are being made today, it seems likely they would qualify.

What ages (of children) might be eligible for the Guardianship Assistance Program? It is proposed that youth over the age of 14 will be eligible.

#### 3. Topic: Other

#### Is the GAL program involved as a stakeholder in Goal 3?

Yes. If you look at goal 3 you can see we are going to be engaging with Administrative Office of the Courts (AOC) staff and other judicial partners. The GAL program is included within the scope of AOC. The NC Division of Social Services already has bimonthly meeting with our AOC partners, including GAL program staff.

# In the PIP draft, what is the timeframe that Q1, Q2, etc. refers to? Is Q1 the first quarter of coming fiscal year or first quarter of 2017?

In the PIP draft, the quarters (Q1, Q2, etc.) cover the two years from the date the Children's Bureau approves the PIP (and the final third year of monitoring in some cases). The precise timeframe for the PIP is currently unknown given we are still negotiating the specifics with our Federal Partners, so we have put the generic quarters in as placeholders. We believe it may be 2-3 months (from today) before NC's PIP is approved, at which time, exact dates will be entered.