



STRENGTHENING THE FUNDAMENTAL BUILDING BLOCKS OF THE SYSTEM

CHILD WELFARE WORKFORCE

An informal CWLA survey of state child welfare officials, conducted in August 2008, found general consensus that the greatest challenge is the child welfare workforce. States face challenges in keeping good workers on the job and reducing turnover. Closely related to this, and in fact contributing to turnover, is maintaining a large enough supply of competent supervisors who can provide critical support to frontline and direct service staff.

An additional problem among states is the looming loss of experienced workers due to retirement. This departure of baby boomers is compounded in times of budget cuts and a recession economy, when early retirements become an option that helps states reduce budgets. This strategy may help reduce immediate fiscal pressure, but it eliminates a vast wealth of knowledge and experience that cannot easily be replaced.

These problems spread among all states and the many private nonprofit and faith-based organizations that comprise the child welfare system. Turnover can result in delays in reaching family and child reunification, alternate permanency options, and needed services. Workforce shortages play a role in all areas where critics cite their biggest concerns: failure to recruit enough foster parents, failure to recruit more adoptive families, lack of timely investigation of abuse complaints, lack of follow-up services for vulnerable families, children staying in care too long, individual children having several caseworkers over a short period of time, failure to advocate for continuing elementary and high school education, failure to oversee children receiving proper medical care, poor transition of youth leaving foster care, and failure to prevent removal of children when proper services and support could help families stay together.

By crafting a child welfare system that is not adequately staffed, trained, or supported, we have in some instances created a system that makes it difficult to carry out the mission. Over the past decade, we have witnessed successes that have helped children find permanent families, including dramatic increases in adoptions, from 38,913 in 1998 to more than 51,000 in 2006; reduction in the number of

children in foster care, from more than 562,000 in 1999 to 510,000 in 2006; increased placement of children in kinship care; and 54% of children reunified with their families. But each of these areas can and must be improved upon. We also must step up our efforts to prevent child abuse and child neglect. All of these improvements require a workforce fully staffed, educated in best practices, and supported by proper supervision, equipment, and attention to worker safety.

Child welfare work is labor intensive. Workers must engage families through face-to-face contact, assess children's safety and well-being through physical visits, monitor progress, see that families receive essential services and supports across multiple systems, help with problems that develop, and fulfill data collection and reporting requirements.

Recruitment is an important first step in building a child welfare workforce. In 2008, Congress reauthorized the Higher Education Act. As part of that reauthorization, Congress created a loan forgiveness program that covers child welfare workers working for public or private agencies. This new program could provide up to \$2,000 of loan forgiveness for each of the first five years a social worker remains at an agency. To implement this new program, Congress must now provide the funding. Recruitment will also require greater efforts to build a career development ladder for social workers taking up the field of child welfare. Some states, such as Kentucky, have formed partnerships with their state universities to provide training and recruitment. A small amount of funding exists under Title IV-B part 1 Child Welfare Services that can help these kinds of initiatives. Now set at \$7 million, this funding should be increased enough to encourage greater efforts and university partnerships in all 50 states.

Other state efforts that have shown promise include Oklahoma's stipend program, which creates bonuses spread out over two years, since the state's research suggests that new workers staying beyond 25 months are more likely to stay long-term.

In discussing any future expansion of public services or national service initiatives, Congress should also include efforts that would encourage career paths in child welfare as part of this national service.



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Retention is also critical to the child welfare workforce. Once workers are in place, it's important they remain on the job, building years of experience that can inform their work and ultimately help the families and children with whom they have contact. Part of the challenge of retaining good workers is to provide a range of needed supports. Although salary is vital to any job, just as critical is ensuring workers have acceptable caseloads, access to ongoing training, the necessary infrastructure, and feel safe in conducting their work.

Another important factor in addressing retention is providing good supervision by veteran staff. Experienced supervisors can provide critical advice and guidance to caseworkers at important decision points. By having a system and a formula to retain workers, we also build a pool of future supervisors. The voice of experience and senior guidance can play a vital role in maintaining best practices and fulfilling the best interests of children and families involved in child welfare.

With the Fostering Connections Act, Congress has expanded Title IV-E training funds to private agencies and to court- and child welfare-related employees, such as court-appointed special advocates (CASAs) and guardians ad litem. States must have effective technical assistance and guidance from HHS on how to access these funds and use them to expand available training.

In addition to the challenges of recruitment, retention, and proper supervision is the underlying need to address worker safety. Social workers frequently confront unsafe conditions and circumstances. The National Association of Social Workers, the American Federation of State, County, and Municipal Employees, and others have determined significant percentages of workers experience violence or threats on the job. Legislation in the 110th Congress, the Teri Zenner Social Worker Safety Act, would create a small grant program to help develop and implement safety efforts, such as the use of modern technology, including cell phones and GPS equipment, and other measures and training that would help ensure worker safety.

Child welfare workers often experience secondary trauma. This is the result of dealing with the many traumatic events caseworkers may encounter on a regular basis, such as criminal activity, drug use, extreme poverty, the death of a child or adult, and detailed accounts of abuse and domestic violence. Without the supports to help address secondary trauma, burnout can result, manifested as increased absences from work, lower morale, and ultimately a less effective workplace. In a study of CPS workers in Colorado, approximately 50% of staff were suffering from "high or very high levels of compassion fatigue," yet 70% reported "high or good potential for compassion satisfaction."

RECOMMENDATIONS

Short-Term Actions:

- ★ The new Administration should issue regulations regarding the use of Title IV-E training funds enacted under the Fostering Connections Act that that will broadly cover court-related workforce, including all court-appointed special advocates (CASAs) and guardians ad litem.
- ★ The new Administration should provide technical assistance to states in how to draw down Title IV-E training funds and how to leverage those funds to expand training of the child welfare workforce of both public and private agencies and use the new training funds as an opportunity to strengthen public and private workforce development.
- ★ The new Administration should create consistency across HHS regions by allowing the use of Title IV-E training funds not just for training in foster care and adoption activities, but also for training in activities designed to keep children out of foster care.

Long-Term Actions:

- ★ Congress and the new Administration should fully fund the new loan forgiveness program enacted as part of the 2008 Higher Education Reauthorization Act.
- ★ Congress and the new Administration should enact legislation similar to the 2008 Child Welfare Workforce Improvement Act that would fund a study by the National Academy of Sciences on workforce, that will include a study of the challenges and strategies as it relates to child welfare, make recommendations regarding caseload standards, and use data to expand the research, training and demonstration projects.
- ★ Congress and the new Administration should significantly increase the \$7 million in Title IV-B part 1, training funds to allow all 50 states to build or strengthen university and college partnerships to recruit, train, and strengthen the child welfare workforce.
- ★ Congress and the new Administration should significantly increase the current \$20 million allocated in 2010 and 2011 under the Promoting Safe and Stable Families (PSSF; Title IV-B part 2) program funding for workforce improvement and allocate for workforce strategies including bonus programs and technology.
- ★ Congress and the new Administration should designate a portion of funding under PSSF for worker safety similar to the Teri Zenner Social Worker Safety Act of 2007.



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- ★ The new Administration should assure that the U.S. Department of Labor and the Department of Education work with AmeriCorps in an effort to create a model similar to Teach for America that would recruit college graduates to children's human services for two years as a strategy to build the child welfare and other key human service workforce.
- ★ The new Administration and Congress, working through the resource centers and other initiatives, should increase state and local child welfare agencies' awareness of the impact of secondary trauma on the child welfare workforce.

DISPROPORTIONALITY AND CULTURAL COMPETENCE

In the *Child Welfare Outcomes 2002–2005 Report to Congress*, new data reaffirms the challenge of overrepresentation of certain populations in the child welfare system. In 28 states, the percentage of black (non-Hispanic) child victims was at least 1.5 times greater than the percentage of these children in the states' populations. In 4 states, the percentage of black (non-Hispanic) child victims was at least 3 times greater than the states' populations. In 8 states, the overrepresentation of Hispanic child victims was at least 1.5 times greater than their populations in the states; in another 4 states, this overrepresentation was 3 times greater. In 15 states, the percentage of American Indian/Alaska Native victims was 1.5 times greater; in another 6 states, the overrepresentation was 3 times greater than the states' population of these children.

Disproportionality in child welfare refers to the over- or under-representation of a particular ethnic or racial group within the child welfare system, compared with their respective percentage in the general population. An early 1980 HHS National Incidence Study showed that all children, regardless of race or ethnicity, are equally likely to be abused or neglected. But in the years following the study, minorities, especially African American children, were overrepresented.

Nationwide surveys cited African American children as being disproportionately represented within child welfare compared with all other racial and ethnic groups. Of the children entering foster care on the last day of fiscal year 2003, 35% were African American, 17% Hispanic, 39% White, 6% Other, 2% American Indian/Native American, and 1% Asian. Minority children account for more than half of the children in foster care, although they comprise roughly 40% of all children in the nation.

African American and Native American children are twice as likely to comprise the population of children

entering foster care, compared with children in the general population. Data suggest Hispanics and Asians may be underrepresented in foster care nationally, but overrepresented in some counties and states. Research on Native American, Hispanic, and Asian American children is limited due to few studies focusing on these populations, which suggests further research is necessary to better assess their levels of disproportionality.

Research indicates poverty as a contributing factor to disproportionality. A 2007 Government Accountability Office (GAO) report on African American children in foster care found that 23% of African Americans live below poverty levels, compared with only 6% of whites. The rate of single-parent families, an issue also related to poverty, is higher for African American children, who are least likely to live in two-parent households. The National Incidence Study found children in single-parent families are at 77–87% greater risk of harm than are children in two-parent families.

Further compounding the issue, those in poverty have greater difficulty accessing services that can help support and keep families safe and stable. Limited access to services also hinders parents' ability to actually complete required services once their children are removed. Although affordable, adequate housing, substance abuse treatment, and family services, such as parenting classes and counseling, are critical to family reunification, availability and access remains limited. At times, parents encounter long waiting lists for services, and completing such services is lengthy, thus extending the amount of time their children have to remain in foster care.

Some data shows that once the decision is made to investigate, race and ethnicity are no longer factors in determining maltreatment, which is contrary to other data that contends race is a factor throughout a child's stay within the child welfare system. Furthermore, disproportionality is found in the type of services provided. Although African American and Native American children are more likely to be removed from their families and placed in foster care, white children and their families are more likely to receive in-home services.

To improve access to prevention and support services, neighborhoods must be a major partner in this effort. The child protective services (CPS) agency should engage private, faith, community, fraternal, and neighborhood organizations; businesses; and recreational programs in protecting children from child abuse and neglect and providing support to families that could prevent children from coming to the attention of CPS. Neighborhoods and communities must also be involved in ensuring ongoing supports to families, such as corporate-sponsored child care, afterschool programs, flextime for working parents, and parental leave.



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These neighborhoods have to be more engaged in planning with CPS for a range of services and supports.

In addition to points of entry and exit, type of placement is significant in comparing lengths of stay among racial and ethnic groups. African American and Hispanic children are more likely to be placed with relatives (32% and 48%, respectively) than are white children (27%). Placement with a relative is cited as a factor in the disproportionate length of stay in foster care for minority children. Some researchers suggest that due to high numbers of minority children being placed with relatives (which are considered foster care placements), the data will reflect a disproportionate composition of minorities in the system.

Although the rate of African American adoption has increased, the slowness of the adoption process impedes the ability of child welfare agencies to provide children with stable environments in a timely manner. Still, studies show difficulty in finding appropriate adoption placements for African American children, citing factors such as the likelihood of African American children being diagnosed as having special needs or medical conditions and therefore needing additional training, support, and commitment for and from prospective adoptive parents.

Congress took some important steps in 2008 to offer tools to state and private agencies to address the challenge of disproportionality. The GAO had urged Congress to enact new laws to extend the use of Title IV-E funds to kinship placements. Under the Fostering Connections Act, Title IV-E funds are now available for kinship placements. The new law will also allow tribal governments and communities to apply directly for Title IV-E funds to provide foster care, adoption subsidies, and kinship care. State and local agencies will also have greater support for child welfare training, which may help address some of the challenges of disproportionality. This is an important start, but we now require more focus on up-front, or prevention services, and enhancements to them that might prevent children from entering care.

As the demographics of the United States continue to change, child welfare agencies will encounter even more diverse families and will have to find a way to effectively meet their needs. Incorporating a cultural competency framework within the child welfare system can help agencies in their work with diverse families, and will likely reduce disproportionality, because it helps eliminate biases. Culturally competent practices place primary focus on a child's well-being and safety while understanding well-being and safety within a cultural context. Understanding cultural factors within cases of child abuse and neglect allows for appropriate prevention and intervention measures to effectively address the family's needs.

RECOMMENDATIONS

Short-Term Actions:

- ★ The new Administration should address barriers to fully engaging minority families in fostering and adopting, and assist state and local agencies in the use of tools such as family group decision making.
- ★ The new Administration should assist states in the use of such innovations as differential or alternate response and other approaches that can help all families access the services they need to keep their children safe.
- ★ The new Administration should ensure that the removal of children from their homes is based on objective safety measures, and not cultural, racial, or socio-economic biases.
- ★ The new Administration should implement guidance and regulation that will encourage state agencies to take the new option under the Fostering Connections Act to provide subsidized guardianship for children for whom adoption is not the best option.

Long-Term Actions:

- ★ Congress and the new Administration should provide funding for recruitment programs that would provide states and local agencies with the resources needed to develop and implement these programs.
- ★ The new Administration should amend the Inter-Ethnic Placement Act to allow consideration of race/ethnicity in permanency planning. Sound, ethical adoption practice requires attention to racial and ethnic issues, so that the original Multiethnic Placement Act (MEPA) standard—which provided that race is one factor, but not the sole factor to be considered in selecting a foster or adoptive parent for a child—should be reinstated.
- ★ The new Administration should enforce the MEPA requirement to recruit families who represent the racial and ethnic backgrounds of children in foster care and provide funding to support such recruitment.
- ★ The new Administration and Congress should require and provide funding to states and local agencies so that they can report on the corrective steps taken to address disproportionate representation in the child welfare system.

EQUAL ACCESS TO SERVICES/ FUNDING IN TRIBAL CHILD WELFARE

Approximately 2.5 million American Indian and Alaskan Natives live in the United States, representing some 565



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federally recognized tribes. The largest population of Native Americans is concentrated in 13 states and includes more than 646,000 people.

Congressional hearings, beginning in 1974, led to the passage of the Indian Child Welfare Act (ICWA) in 1978. The hearings and the focus of the act were an attempt to address a significant problem reflected in studies between 1969 and 1974, which showed 25–35% of all Native American children in some states were removed from their homes and placed in foster care or adoptive homes. In certain states, Native American children were 13 times more likely to be removed from their families than were non-Indian children.

ICWA requires states to identify Indian children and notify their parents and tribes of their rights to intervene in custody proceedings. ICWA also requires certain procedures regarding the use of tribal courts, child custody proceedings, tribal intervention standards, and placement preferences. The act establishes a two-part requirement for states before they remove an Indian child, which involves efforts to prevent the breakup of the Indian family, and standards for court findings.

In 2005, Congress directed the Government Accountability Office (GAO) to study ICWA's impact and, in particular, determine if the law's requirements caused delays in the placement of Native American children. The GAO concluded ICWA's requirements did not result in poorer outcomes for children. Few states in the GAO study kept detailed information, but those that did provided sufficient data demonstrating no clear link or evidence ICWA was having harmful effects. Interviews with tribes and states participating in the study indicated the law facilitated greater availability of resources and cooperation between tribes and states in protecting and providing services to Indian children. Comments submitted to GAO during its study indicated that, at times, the lack of resources for tribes hindered placements, and states relied on tribes for assistance in meeting ICWA's requirements.

Tribal child welfare services operate in a unique context shaped by laws, jurisdictional issues, cultural factors, financial constraints, and a federal trust relationship that is unlike any other in the states or territories. Efforts by more mainstream technical assistance centers—sometimes in partnership with tribal consultants or Indian organizations—to address tribal program capacity and professional worker development have been ongoing, but even more attention, and a truly dedicated technical assistance and training center, is necessary to properly address these unique issues. Establishing this type of center would more effectively organize resources to address tribal child welfare needs, and allow for fuller development of expertise, as well as new methods for delivering needed technical assistance and training.

Progress in 2008

The recently enacted Fostering Connections Act allows tribes direct access to IV-E funding. Before this legislation, tribes could not access Title IV-E funds to administer their own foster care or adoption assistance programs but instead had to enter into agreements with their respective state governments to access IV-E funds—agreements that more than half of the federally recognized tribes did not have.

The new law creates the option for tribes or tribal consortia to directly access and administer IV-E funds by submitting a plan, including evidence of sound financial management, a description of the service area, and assurance that the use of Title IV-E funds will be for coverage of foster care, special-needs adoptions, and kinship guardianship assistance payment to only those children eligible for Title IV-E funds.

The Fostering Connections Act grants tribes access to a portion of the state's Chafee Foster Care Independence Program funds, and requires certain guarantees by the tribe to provide independent-living services for tribal youth in the state. These provisions in the legislation do not take effect, however, until the start of federal fiscal year 2010 (October 1, 2009).

The new law also provides \$3 million annually to HHS to provide technical assistance to assist interested tribes to directly provide foster care, adoption assistance, and (at tribal option) kinship programs. A tribe or consortia can receive a maximum one-time grant of \$300,000.

To this point tribes have received very few funds from federal child welfare funding sources. Currently, they receive limited set-asides from Title IV-B, parts 1 and 2—Child Welfare Services (CWS) and Promoting Safe and Stable Families (PSSF), respectively. Under part 1, more than half of the tribal grants are less than \$10,000 each; under part 2, most of the tribal grants are under \$40,000 each. Under the Child Abuse Prevention and Treatment Act (CAPTA), tribes compete for a very small portion of funding with other organizations that serve migrant populations. Tribes are not eligible to receive direct funding from other grant programs and are forced to compete with states.

In 2006, the Senate passed the reauthorization of the Indian Child Protection and Family Violence Act, but the House failed to follow through with final action. The legislation would have reauthorized funding for child protection programs for tribal communities. First enacted in 1990, the act is intended to channel child abuse prevention and treatment funding to tribal governments nationwide. Throughout their history, the two grant programs authorized for tribes to prevent or treat victims of child abuse and neglect have not been funded.



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RECOMMENDATIONS

Short-Term Actions:

- ★ The new Administration should give high priority to providing initial guidance to tribes interested in conducting Title IV-E tribal foster care, adoption assistance, kinship, and independent living programs.
- ★ The new Administration should propose and facilitate the development of key regulations, including those that establish a definition of in-kind matching contributions as part of the Title IV-E tribal programs.
- ★ In the first year, the new Administration should allocate technical assistance funds to assist tribes that have applied to establish Title IV-E tribal programs.
- ★ The new Administration should encourage and work to develop cooperative efforts between state governments and tribes to implement effective strategies that will address infrastructure issues such as effective data collection and administrative procedures.

Long-Term Actions:

- ★ Congress and the new Administration must fully fund Title IV-B part 2, Promoting Safe and Stable Families (PSSF), to ensure that tribal families have the resources they need.
- ★ Congress and the new Administration should give tribes greater funding access through Title IV-B and other child welfare and human service programs such as the Child Abuse Prevention and Treatment Act (CAPTA) and the Social Services Block Grant (SSBG).

DATA COLLECTION SYSTEMS

The collection of data on children in foster care and children contacted by child protective services (CPS) is relatively new. Not every state was required to report its foster care statistics until 1975. Before 1980, states were not required to collect data on non-federally assisted foster care, which in some states include more than half the foster care population. The Adoption Assistance and Child Welfare Act of 1980, however, imposed new data requirements.

In 1990, the U.S. Department of Health and Human Services (HHS) issued regulations to implement the Adoption and Foster Care Analysis System (AFCARS), which collects case-level information on all children in foster care for whom state child welfare agencies have responsibility for placement, care, or supervision, and on children who are adopted under sponsorship of the state's

public child welfare agency, regardless of children's eligibility for Title IV-E funds.

While changes were being enacted with regard to data on children in care, in 1988 Congress, with the reauthorization of the Child Abuse Prevention and Treatment Act (CAPTA), established the National Child Abuse and Neglect Data System (NCANDS), a voluntary national data collection and analysis system created in response to the requirements of CAPTA that would track the volume and nature of child maltreatment.

Regulations were issued in 1993 to establish the Statewide Automated Child Welfare Information System (SACWIS), intended as a comprehensive automated case-management tool that operates at the state level and supports social workers' foster care and adoptions assistance practice. SACWIS informs AFCARS and NCANDS reports. If cost-efficient, SACWIS functions could include resource management, tracking and maintenance of legal and court information, administration and management of staff and workloads, licensing verification, risk analysis, and interfacing with other automated information systems.

The Child and Family Service Review (CFSR) process was the result of a 1994 congressional mandate included as amendments to the Social Security Act (P.L. 103-432), which required HHS to review state child welfare programs to ensure "substantial conformity" with state plan requirements in Titles IV-B and IV-E. The law requires that state child welfare programs be measured or judged in certain areas or standards. HHS and the states worked to develop this review process over the next several years.

State child welfare information systems are largely defined by two major factors:

- federal reporting requirements and their relation to the implementation of the CFSRs as part of a heightened national effort at measurement and accountability, and
- the unique needs of individual states, particularly as they apply to the demands of case management and individual financial record keeping.

This results in a national child welfare information system that is actually a collection of 51 different systems, bound together principally by the need to report a core set of data elements to the federal government. The systems have evolved to be responsive to such things as unique state case practice standards, differing levels of authority between state and local jurisdictions, varying roles among state agencies, and the demands of state finance and management systems.

When we put all of this into practice, a system must have the capacity to accomplish three things:



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- state compliance with federal reporting requirements, including documentation of the state's ability to meet federal outcome standards under the Adoption and Safe Families Act (ASFA);
- program management and decision making, including providing the data necessary to track and analyze both short- and long-term indicators of individual and system performance; and
- ongoing daily case management.

The requirement to perform case management functions is perhaps the most important thing to appreciate about state information systems. These systems are not simply for reporting. They also must be fully integrated into the daily work of thousands of direct service staff as tracking and decision-making tools. Complete, accurate, and timely information about the status of individual children is essential to providing supervision and care to children.

States, even those with approved SACWIS frameworks, have much more to accomplish in fully implementing information systems that meet all of the demands of federal reporting, agency management and accountability, and case management. Significant technological challenges still exist, both for those states still designing systems and those in need of upgrades for existing systems. The most daunting challenges, however, remain with the human factor. Additional investments are necessary in reducing workloads and improving the capacity of frontline staff to integrate information management methods into sound case practice.

On occasion, federal guidance and rules can make the use of SACWIS a barrier for caseworkers and agencies attempting to address the needs of the families and children they serve. Some local agencies have the technology to link directly with a state's SACWIS. They have been blocked by the federal government, however, and as a result may be using valuable resources of staff and money to reenter data into SACWIS when they have the software to avoid this duplication.

Given the complexity of these systems, maintaining strong federal leadership will be necessary for years to come. States will continue to need support in the form of funding, technical assistance, training, and clear standards for both practice and data management, but this guidance must recognize the always-changing world of computer technology.

One of the areas where strong support from the federal government is necessary is in the use of the CFSRs, which the Children's Bureau began conducting in 2001. Federal law requires that state child welfare programs be measured or judged in certain areas or standards. In 2007, the Children's Bureau began the second round of CFSRs. As

of December 2008, 32 states were scheduled to have completed their reviews. In the first round of reviews, no states "passed," or achieved substantial conformity in their CFSRs. Because of this, all states were required to complete Program Improvement Plans (PIPs), which gave them the opportunity to improve specific outcome and systemic factors. The PIP is a two-year process, with an extra year allowed for states to realize negotiated improvements in their outcome data.

States, advocates, and others have noted a number of challenges with the CFSR process. States have expressed concern that the original sample size of 50 cases, and increased sample size of 65 in the second round, is not adequate as representative of their outcome performance. Some debate exists among child welfare researchers and advocates over the specific outcomes being measured and their value as performance indicators. States do provide HHS with data regarding their performance on a number of outcome measures through their AFCARS submissions. The determination of substantial conformity on specific outcome measures, however, is based on an on-site review. A state may actually exceed national standards on specific outcome measures and still be required to develop a PIP for those outcomes.

In the second round of CFSRs, states' performance has improved in some areas and decreased in others. This inconsistency calls into question the value of the process and the accuracy and validity of the measurements. Although many states agree the CFSRs have compelled them to closely scrutinize their policies and practices with a focus on outcomes, the methodology may be counterproductive in terms of providing states with the guidance and resources necessary to achieve their goals of improved outcomes.

Another difficulty in data collection that extends to oversight is the penalty structure when errors are detected. In some human service areas, such as the Food Stamp program, when a program is in error, the state is allowed to take the fine imposed by the federal government and reinvest it in the system to address the cause of the errors. The same process should be incorporated into child welfare.

RECOMMENDATIONS

Short-Term Actions:

- ★ The new Administration should allow states that utilize the services of nonprofit child welfare agencies to have providers enter data directly into the Statewide Automated Child Welfare Information System (SACWIS), and transfer data between agencies, resulting in better use of staff time, more attention to caseload, and a maintenance of required data.



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Long-Term Actions:

- ★ Congress and the new Administration should enact legislation similar to the 2008 Child Welfare Workforce Improvement Act that would fund a study by the National Academy of Sciences on workforce. This study would look at the challenges and strategies as it relates to child welfare, make recommendations regarding case-load standards, the use of data, and expand the research, training, and demonstration projects. Such a study should include workers involved with the child protective services and those considered to be part of the front end of services.
- ★ Congress and the new Administration should enact legislation to evaluate data collection and reporting strategies in fields similar to child welfare, with particular attention paid to the established national standards, the impact on service provision and workforce, and capacity of states to comply with federal data collection requirements. Recommendations for future data collection efforts should be based on the findings of this study. In light of the Adoption and Foster Care Analysis System (AFCARS) Notice of Proposed Rule Making released in 2008, this study should be done prior to any rule changes being put into place.
- ★ Congress and the new Administration should revise the Child and Family Service Review (CFSR) process to allow states to substitute AFCARS outcome data for the on-site review measurements.
- ★ Congress and the new Administration should evaluate the CFSR and the Program Improvement Plan (PIP) process and results. The oversight and closer scrutiny are important and useful tools, but the results of these first two rounds and whether they have created and improved results for families and children need to be examined, along with ways to improve or change the process and measures.
- ★ Congress and the new Administration should replace the current penalty format with a system that reinvests dollars so that child welfare systems can make necessary improvements.
- ★ Congress and the new Administration should initiate legislation that provides for more comprehensive federal funding for states developing a SACWIS, and should support more flexibility in data collection/reporting strategies and partnerships with local agencies.

URBAN AND RURAL CHALLENGES

There are several conditions found in our nation's urban centers that may exist throughout our country, but due to the fact that these problems can be concentrated in U.S. cities, a greater and increased pressure is brought to bear on that city's child welfare system.

Poverty has a tremendous impact on child welfare and well-being. Many children raised in poverty begin their lives at a disadvantage because of inadequate prenatal care, poor maternal nutrition, or birth complications. They often face an array of family and environmental obstacles, including low levels of parental education, increased levels of family stress, poor social support, and limited community assistance. Compared with other children, children living in poverty are more likely to experience difficulty in school and have a higher high school drop-out rate. Urban school districts have a high school graduation rate of 60.4%, compared with the national average of 69.9%, and the suburban average of 74.9%.

Poverty during early childhood may be more damaging than poverty later in life because much of the foundation for learning is built in the early years. Children in poverty score lower on measures of vocabulary, language skills, understanding of number concepts, organization, and self-regulation. Children raised in poverty are likely to experience more risks and have fewer protective factors and resources than children living above the poverty threshold. In addition, children living in poverty are more likely to become teen parents and, as adults, earn less and be unemployed more frequently.

The stress created by living in poverty may play a distinct role in child abuse and neglect. Parents who experience prolonged frustration in trying to meet their family's basic needs may be less able to cope with even normal childhood behavior problems; those who lack social support in times of financial hardship may be particularly vulnerable. According to child abuse risk assessments, child protective services (CPS) staff frequently rate parents who experience employment problems as being at moderate to high risk of child maltreatment.

According to estimates, some 2 million children in the United States have an incarcerated parent. These children face immense challenges to their mental health and emotional well-being. Incarceration affects families both economically and socially. They face economic instability resulting from the loss of the incarcerated parent's income, as well as uncertainty in their living arrangements, which can result in children entering the dependency system. Many experience the stigma and shame associated with incarceration.

The emotional trauma of having an incarcerated parent has lasting effects on children. The trauma of loss occurs



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both at the initial removal of the parent from the home and with the barriers to communicating with the parent. The coping mechanisms that children develop to handle this trauma can result in long-term emotional and behavioral issues. The challenges and needs of this population are steadily growing as the rate of incarceration increases.

Substance abuse and child maltreatment are tragically, undeniably linked. Alcohol and other drug use and abuse have a profound effect on millions of children and their families and pose a challenge to the capacity of the child welfare system. More than 6 million children in this country live with substance-abusing parents. The impact on child welfare is clear: Children whose parents abuse alcohol and other drugs are nearly three times as likely to be abused, and more than four times as likely to be neglected, than are children whose parents are not substance abusers.

Child abuse and neglect are inextricably intertwined with substance abuse. Caring for children in substance-abusing families is a major factor in child welfare and has other social costs as well. According to a 1999 survey by Prevent Child Abuse America, 85% of states identified substance abuse as the problem most frequently exhibited by families reported to CPS agencies for maltreatment.

RECOMMENDATIONS

Long-Term Actions:

- ★ Congress and the new Administration should support expanded federal resources to increase substance abuse treatment capacity within the child welfare system and stimulate effective partnerships between child welfare and substance abuse agencies.
- ★ Congress and the new Administration should support efforts and legislation that would encourage community-based partnerships to address the problems of access to health and mental health services, housing, and family support services.
- ★ Congress and the new Administration should implement policies and establish procedures for limiting the disruption and trauma that children of incarcerated parents who are in care may experience, based on individualized reviews of each family's case history.

THE CHALLENGES TO RURAL AMERICA

Providing services in rural communities demands a different approach than that in urban and suburban communities.

For too long, practitioners have assumed that models developed, tested, and proven effective in urban settings would easily translate to rural settings. Instead, rural communities have unique characteristics that require services tailored to their cultures. Broad application of services developed in urban settings and applied without regard for cultural differences in rural communities can actually harm recipients of those services and the perceptions of service providers.

Promoting cultural competence in human services has focused attention on ensuring that services are provided in a manner that respects the client's culture. As we gain understanding of the aspects of rural culture, we learn to provide services in rural communities differently than we would in other environments. Rural communities tend to be closer-knit, they can be distrustful of outsiders, they emphasize family and individualism, and often they are influenced by religious beliefs.

The needs of children and families in rural communities are related to a range of conditions that can exist in rural communities as a whole, such as poverty, cultural and racial differences, and geographical and social isolation. In rural communities, poverty and racial disproportionality are closely linked. Nearly half of rural African American children live in poverty (48%), compared with 46% of rural Latino children and 41% of Native American children. Poverty is tied to significant health risks, such as higher rates of infant mortality, childhood illness, and nutritional deficits.

Rural communities can have limitations when it comes to the workforce and educational opportunities. Another major problem is the lack of resources available within the community and the difficulty posed by having to travel long distances to get to more urban areas where a broader range of services may be available. The 40 million Americans who live in rural communities often lack access to critically needed social services.

It is important to understand, however, that there is not one "rural America." Differences exist in culture, expectations, and beliefs from one rural area to another. But common factors do exist among rural communities that, when understood and accounted for, can improve the quality of services.

If we are to serve rural clients appropriately, not all standards generally accepted in social service practice can apply within these communities. For example, traditional social service ethics demand careful attention to dual relationships and conflicts of interest. The small-town nature of rural localities, however, makes it nearly impossible for a professional to avoid dual relationships with clients, if that professional lives in the area in which he or she also works. In many cases, due to the lack of service alternatives available in the community, it may be unethical to decline a client on the basis of a dual relationship.



STRENGTHENING THE FUNDAMENTAL BUILDING BLOCKS OF THE SYSTEM

Social service professionals in rural areas will be called upon to offer a broader range of services themselves because of the lack of other available services, similar to a general medical practitioner as opposed to a medical specialist.

Social service professionals have to network to a greater degree within the rural community to provide services in a highly collaborative manner that reflects the community's values. For example, mental health practitioners often are encouraged to co-locate with medical professionals because of the high esteem in which rural community members hold family doctors, and a doctor's recommendation that one see a counselor can carry great weight. Linking clients to other services is a key role of social service professionals, particularly in underserved areas. This likely will demand professional relationships and collaboration among providers to establish the network and maintain trust. Social service professionals also must recognize that, within rural communities, the concept of service provider may encompass roles and locations traditionally overlooked by professionals, such as pastors or local business leaders, or community centers that can provide resources for clients that are not available elsewhere.

RECOMMENDATIONS

Long-Term Actions:

- ★ Congress and the new Administration should undertake research, create plans, and enact policy that ensures rural communities receive ample resource allocation needed to address the unique barriers and characteristics of these communities.
- ★ Congress and the new Administration should also provide rural communities with basic human services that include a special focus on the need for day treatment services, mental health and psychiatric services, and access to basic health care.
- ★ Congress and the new Administration should promote educational and workforce options that may help address some of the unique rural barriers, such as the use of e-learning and other technological tools that may overcome distance and other barriers.

IMMIGRATION ISSUES IN CHILD WELFARE

Families are central to children's well-being. Family ties, especially between parent and child, are extremely important. CWLA's *Standards of Excellence for Services to*

Strengthen and Preserve Families and Children provide a vision of what is best for children and their families. The *Standards* point out that children develop the ability to have productive lives in the context of their families.

Immigrant families are a large and growing segment of the population. An estimated one-fourth of children and youth in the United States are either immigrants themselves or children of immigrants. Data about the number of children in the child welfare system who are immigrants is difficult to obtain.

The child welfare system, however, does not have enough translation services or bilingual staff members at any level. Too often, child victims of abuse and neglect are asked to translate for a parent who is suspected of abuse or neglect. The system also has a lack of culturally relevant services, such as parenting classes and drug treatment programs. Cultural norms and child-rearing practices often differ from those most common in the United States, so services must be culturally competent.

We have to examine eligibility guidelines for support services. In many instances, immigrant families lack access to federal income and employment supports. Undocumented children are not eligible for federally funded Title IV-E foster care. Welfare reform and immigration reform have restricted immigrants' access to food stamps, public health insurance, Supplemental Security Income (SSI), and Temporary Assistance for Needy Families (TANF).

Without reliable data on the number of immigrant children and families in the child welfare system, effective planning and service delivery is difficult. Research about immigrants in the child welfare system should be encouraged, and data about immigrants in the system should be collected, analyzed, and summarized on a national, regional, and local basis. Policymakers and community agencies need this information to be responsive to immediate and emerging needs.

We need to consider increasing federal funding for child welfare services to eligible immigrant children and families. Federal funding is necessary for a variety of interventions, including foster care and services for undocumented children and youth. Training and technical assistance to states and communities can adequately respond to the diverse and often complex needs of eligible children and families with transnational and immigration issues.

Recent Developments

The reasons undocumented and mixed-status children enter child welfare are no different than those of other children, but these children do face many unique challenges. There is much trauma associated with migration. Once a family



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arrives in the United States, cultural and language barriers, fear, poverty, and difficulty finding work create further stress on families.

Child welfare agencies also face unique challenges serving children of immigrants or mixed-status parents. Federal law requires that states consider giving preference to relatives when a child is placed outside the home, but relatives are not always available in immigrant communities, and the children may be placed in nonrelative family foster care. Involvement with child protective services (CPS) can be especially traumatic for immigrant children. They are new to the country, may not speak English, and are likely to have different cultural backgrounds. Placement in nonrelative family foster care group homes may be particularly upsetting and difficult for immigrant children. Additionally, permanency planning for these children is more complex.

Children who are separated from parents face short- and long-term psychological damage, including depression, post-traumatic stress, anxiety, feelings of abandonment, and suicidal thoughts. Increased immigration enforcement by the federal government is jeopardizing the health, well-being, and economic security of our nation's children. Immigration raids and actions by law enforcement have resulted in hundreds of children being separated from their parents. These separations cause serious disruptions that can have large, long-lasting negative consequences for children and communities. These disruptions cause tremendous stress on families. When parents are unable to provide care and supervision, their children are at increased risk.

Immigration enforcement officials should employ humane policies and procedures when dealing with the arrest, detention, and processing of anyone involved in workplace immigration enforcement operations, and especially anyone with children. Enforcement must be done in a way that is humane and protects the children involved. Immigration laws must be enforced, but we must respect basic human dignity as we enforce the law.

RECOMMENDATIONS

Short-Term Actions:

- ★ The new Administration should provide up-front guidance and technical assistance to all the states and child welfare agencies on proper handling of immigration issues.
- ★ The new Administration should ensure that the immigration enforcement officials give sufficient notice to these agencies of an impending raid so they can arrange for representatives who speak the detainees' first language fluently and for any other services that

may be needed. Additionally, they need to place undocumented immigrants, especially parents, in detention within the jurisdiction of the local immigration field office (to the extent that space is available), so the interruption of the interaction with children is minimized. A toll-free number should also be provided for families to use after a raid, to report their relationship to a detainee and to inquire for more information about the status of their loved one.

- ★ The new Administration should ensure that the child welfare systems assist immigrant children in obtaining legal permanent residency under the Special Immigrant Juvenile Status (SIJS) provisions and other immigration options of existing immigration law.
- ★ Congress and the new Administration should allow the Court Improvement Program funds to be used to train judges and lawyers to assist children with immigration options.

Long-Term Actions:

- ★ The new Administration should ensure that the immigration authorities and child welfare agencies consider the child's best interest—safety, permanency, and well-being—in all decisions concerning immigrant children.
- ★ The new Administration should assist states and local agencies in screening all children in the child welfare system as to their eligibility under immigration options.
- ★ Congress and the new Administration should make federal funding available to 1) pay for foster care and services for undocumented children and youth; 2) create national resource centers that will provide training and technical assistance to all states so that they have a better understanding as to how to best assist families with transnational and immigration needs; and 3) create resources for states to adequately respond to the diverse and often complex needs of eligible children and families with transnational and immigration issues.
- ★ As part of any immigration reform, Congress should include ways to collect data about immigrants in the child welfare system. The data should be analyzed and summarized on a national, regional, and local basis. Policymakers and community agencies need accurate and up-to-date data regarding immigration status of children in their communities. This information is needed to be responsive to immediate and emerging needs.