



DEPARTMENT OF HEALTH & HUMAN SERVICES

ADMINISTRATION FOR CHILDREN AND FAMILIES
Administration on Children, Youth and Families
1250 Maryland Avenue, S.W.
Washington, D.C. 20024

JUN 11 2007

Michael J. Willden, Director
Department of Health and Human Services
4126 Technology Way
Room 100
Carson City, Nevada 89706-2009

Dear Mr. Willden:

I want to thank you and your staff for meeting with the Federal review team on May 1 - 4, 2006, in Las Vegas and Carson City and for the timely submission of Nevada's Child and Family Services Review (CFSR) Program Improvement Plan (PIP) eighth quarter report (covering the period December 1, 2006 – February 28, 2007, on April 1, 2007). The purposes of the site visit were to evaluate the State's progress in implementing the PIP, and to review the State's achievements and challenges.

Based on the results of Nevada's CFSR in February 2004, the State developed a PIP that included a series of action steps and benchmarks, identified specific numeric goals to achieve (as measured by the State's on-site case review process), and identified a minimum level of improvement that would be made towards achieving the National Data Standards (NDS). Subsequent information that came to light, such as the Independent Child Death Review Panel, consistent overcrowding at Child Haven and tragedies involving children in foster care lead to a re-negotiation, in September 2007, of the State's PIP and the addition of ten new action steps and seventy-three new benchmarks.

The purpose of this letter is to inform you that the State has successfully completed all action steps and benchmarks in the PIP. In addition, the State has achieved the identified specific numeric goals for all outcome measures, except for Safety Outcome 1 Items: Timeliness of Investigations (Item 1), Repeat Maltreatment (Item 2), and Safety Outcome 2 Item: Risk of Harm (Item 4), and Permanency Outcome 1 Item: Permanency goal for child (Item 7). These measures are being monitored through the agency's quality assurance case reviews. In addition, the State has achieved the goals set for the two NDS indicators (Time to Reunification and Placement Stability) during the PIP period. Although the State is still working to achieve the goals of Safety Outcomes 1 and 2 and Permanency Outcome 1, Nevada can and should take pride in the actions it has taken to improve its services to the children and families in the State.

In the June 2004, CFSR final report, Nevada was initially informed that the minimum penalty associated with the level of non-conformity (for seven outcome measures and three systemic factors) was approximately \$368,955, based on the first year of expenditures (FY 2004). The

cumulative penalties (as of FY 2007, Quarter 1) for these ten areas total \$1,699,402. As a result of the goals that the State has met, we are rescinding the penalties associated with four outcomes measures and three systemic factors. Approximately \$ 608,628, of the cumulative penalties remain in place pending achievement of the measures related to Safety Outcomes 1 and 2, and Permanency Outcome 1. The amount of these penalties will continue to increase until the State meets the PIP goals during the non-overlapping data period, as described in the paragraph below. Failure to meet the PIP goals by this deadline will mean that penalties must be paid by the State and will continue to accrue and be paid until either the State is found in substantial conformity during the next CFSR or the State successfully completes a PIP as a result of that subsequent CFSR (according to 45 CFR 1355.35(d) (4) (iii)).

Per the Child and Family Services Review Technical Bulletin #1, dated January 2005, the State has a 12-month evaluative period of non-overlapping data, following the closure of its PIP, to come into conformity with any outstanding outcome measures. For Nevada, this 12-month period began March 1, 2007, and will end on February 28, 2008. We will monitor Nevada's case review results throughout this period to determine whether the State achieves the goals for the outstanding Safety 1 and 2, and Permanency 1 Outcomes.

Because of the magnitude of the cumulative fiscal risks pursuant to 45 CFR 1355.36(e) (2) (iii) for failure to be in substantial conformity with any of the CFSR outcome measures, it is important that the State continue its efforts to meet the PIP goals by February 28, 2008.

In June 2006, we agreed to use the results of the State's first statewide case review as the baselines for items 1, 2, 3, 4, 7, 17, 19 and 20. According to the State's January 2007 case review results, the goals for items 17, 19 and 20 have been achieved. Timeliness of investigations (Item 1), Repeat Maltreatment (Item 2), Risk of Harm (Item 4) and Permanency goal (Item 7) remain outstanding. During the year of non-overlapping data, the State will need to achieve a 20 percent increase in the cases complying with the elements related to timeliness of investigations, a 5.5 percent increase in the cases complying with the elements related to repeat maltreatment, an increase in 3 percent of the cases complying with the elements in the area of risk of harm, and an increase of 9 percent in the area of permanency goal of child. See enclosure A.

The State has implemented many systemic, program and practice changes, including the differential response program, facilitating legislative changes, effectively supporting efforts to obtain additional staffing and fiscal resources, and realizing improvements toward meeting many goals and outcomes for children and families. Of note is the State's progress in standardizing, defining and implementing consistent statewide policies and procedures, the significant progress made towards improving access to mental health treatment for children with the assistance of a Substance Abuse and Mental Health Services Administration systems infrastructure grant, and the development and implementation of the first statewide Quality Assurance Case Review System.. The State will need to make a concerted effort to sustain the systemic and programmatic changes initiated and completed under the PIP, as well as commit to continued progress in these areas.

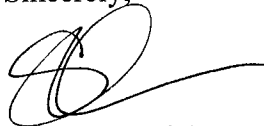
Although a great deal of progress has been made, the State still has considerable work to do to meet the national data standards and the 95 percent scores for cases reviews expected in order to

achieve conformity in the next CFSR scheduled in 2009. As the largest metropolitan area, Clark County represents unique challenges and opportunities. The County has struggled to license its shelter, recruit and retain enough foster homes and agency staff, develop collaborative and effective relationships with service providers and create a vigorous and sustainable array of services. The State's recent efforts to provide direction and guidance to Clark County with staff and resource investment will need to continue for the State to be successful in reforming the child welfare system. The State's commitment to transparency, sharing and reviewing data and following up with suggested or needed improvements will be essential in continuing child welfare reform in Nevada. The State must continue its commitment of oversight in Clark County.

As you are aware, training and technical assistance is available to assist the State. We have suggested that the State contact the National Resource Center for Organizational Improvement (NRCOI) for further on-site assistance in evaluating the Quality Assurance/Case Review process to ensure it achieves the intent of the process.

We have held, and will continue to hold, regular conference calls and work with the State as it continues to develop strategies to improve and accurately measure Nevada's performance.

Sincerely,



Susan Orr, Ph.D.
Associate Commissioner
Children's Bureau

Enclosure

cc:

Fernando Serrano; Division of Children and Families; Carson City, NV
Barbara Legier; Division of Children and Families; Carson City, NV
Jerry Milner; Children's Bureau; Washington, DC
Linda Mitchell; Children's Bureau; Boston, MA

**Statewide On-Site Case Review Results
2005-2006**

Item/Outcome	Item/Outcome Description	PIP BASELINE (SET YEAR 1)	GOAL YEAR 2	ACHIEVED YEAR 2	DIFFERENCE
Outcome S1	Children are first and foremost, protected from abuse and neglect				
Item 1	Timelines of investigations	88%	90%	70%	-20%
Item 2	Repeat maltreatment	98%	99.5%	94%	-5.5%
Outcome S2	Children are safely maintained in their homes whenever possible and appropriate				
Item 3	Services to families to protect children and prevent removal	86%	88%	88%	0
Item 4	Risk of harm to children	68%	70%	67%	-3%
Outcome P1	Children have permanency and stability in their living situations				
Item 7	Permanency goal for child	90%	92%	83%	-9%
Outcome WB1	Families have enhanced capacity to provide for their children's needs				
Item 17	Needs and services of child parents and foster parents	60%	62%	72%	+10%
Item 19	Worker visits with child	55%	57%	70%	+13%
Item 20	Worker visits with parent(s)	58%	60%	68%	+8%