



August 6, 2013

Region IX  
90 7th Street  
San Francisco, CA 94103

Amber Howell, Acting Administrator  
Department of Health and Human Services  
Division of Child and Family Services  
4126 Technology Way, 1<sup>st</sup> Floor  
Carson City, NV 89706

Dear Ms. Howell:

This letter is in regard to the Nevada Child and Family Services Review (CFSR) Program Improvement Plan (PIP) that was approved by the Children's Bureau, Administration for Children and Families, on December 1, 2010. As of June 30, 2013, Nevada completed Quarter 10 of the PIP and submitted a status report on July 31, 2013. The purpose of this letter is to provide you with a status report on progress the State has made in meeting the terms and conditions of the PIP.

#### **Action Steps and Strategies**

The State has fully completed all action items and benchmarks listed in the PIP.

#### **Performance Measures**

As the State requested, the baselines for performance measures were prospective and established during the review cycle of January 2011 through December of 2011. The State has met the negotiated baselines for the Item measures as follows:

Safety Outcome 1:	Item 1-Timeliness of initiating investigations
Safety Outcome 2:	Item 3-Services to family to prevent removal
Safety Outcome 2:	Item 4-Risk of Harm
Permanency Outcome 1:	Item 7- Permanency Goal
Permanency Outcome 1:	Item 10-Other planned permanent living arrangement
Well-Being Outcome 1:	Item 17-Needs and services of child, parents, foster parents
Well-Being Outcome 1:	Item 18-Child and family involvement in case planning
Well-Being Outcome 1:	Item 19-Visits with children in foster care
Well-Being Outcome 1:	Item 20-Caseworker visits with parents

2. Ms. Amber Howell

However, the State has *not* met the National Standard for the Safety Outcome of Absence of Maltreatment of Children in Foster Care. Your current performance is 99.43, while your goal is 99.64. Since there is a pending data measure, the State continues to be in the non-overlapping period, which ends March 31, 2014.

As you discuss in your Q10 submission letter, you have taken a variety of steps to improve your performance and meet this target: you have evaluated the input of inaccurate data, mapping problems and programmatic concerns. After extensive review of FY 2011 and FY 2012 data, you resubmitted FY2011 resulting in an increase from 99.43 to 99.59. You've also identified the following pending concerns:

- Disproportionate amount of cases coming from Clark County;
- Lengthy appeal processes with a high number of overturned appeals due to a lack of consistency in the process of substantiating, unclear documentation of the investigation and assessment, and a "credible evidence" level of proof; and
- Mapping problems in UNITY.

We encourage you to continue your analysis and to evaluate your programs and practices (in addition to your strategies of refining your data), to determine other avenues that may improve safety outcomes for children in care. As you continue with your improvements and refinements, feel free to resubmit your data and we will re-run your profile to improve accuracy. Please understand that any changes in the baseline data may result in changes to the baseline and consequently changes to the negotiated improvement goal.

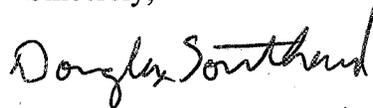
As the State is aware, the Children's Bureau is required to assess a penalty, pursuant to 45 CFR 1355.36, if a State is unable to successfully complete its PIP. If the State fails to meet the negotiated improvement goals, the estimated potential assessed penalty could be **\$340,299**.

We appreciate all the hard work and dedication that your staff has demonstrated in successfully completing the elements of the PIP that the State has met. We will continue to work with your staff providing technical assistance in an effort to meet the outstanding requirements. Your efforts to improve the permanency, safety and well being of Nevada's children are greatly appreciated.

If you have questions or comments related to the PIP, please contact Mark Marshall, State Specialist at (415) 437-8554 or by email at [mark.marshall@acf.hhs.gov](mailto:mark.marshall@acf.hhs.gov) or Liz Walker, ICFI Consultant, CB Region IX Child Welfare at (415) 437-8660 or by email at [elizabeth.walker@acf.hhs.gov](mailto:elizabeth.walker@acf.hhs.gov).

3. Ms. Amber Howell

Sincerely,

A handwritten signature in black ink that reads "Douglas Southard". The signature is written in a cursive style with a large initial 'D'.

Douglas Southard  
Regional Program Manager  
Children's Bureau Region IX

Cc:

Jill Marano, Deputy Administrator, Division of Child and Family Services,  
4180 South Pecos, Suite 150, Las Vegas, NV 89121

Jan Fragale, Social Services Chief III, Division of Child and Family Services,  
4126 Technology Way, 3<sup>rd</sup> Floor, Carson City, NV 89706

Angela Adams, JBS Contractor, CFSR Unit; Children's Bureau, Washington, DC