

We appreciate the opportunity to provide feedback on the OSRI Quarterly Report. Feedback was received from 22 counties. Counties appreciated seeing the data from the reviews and several remarked that seeing other state's performance was a helpful comparison point. Many counties expressed serious concerns about the decline of performance reviews. Equally concerning were that the recommendations provided to directors were insufficient to improve performance. After reviewing the comments provided, the tri-chairs of Children's Services Committee have identified several questions regarding additional information that could be included in the report. These questions are listed below:

- The apparent decrease in performance as indicated in the OSRI review data is troubling, especially the data reflecting a more significant decline by the 10-pilot counties as compared to the other 90 counties. Much of the PIP efforts are focused on the 10 pilot counties and we would expect their performance to be higher than the other 90 counties. We are seeking information from the Division regarding their understanding of the "big picture" of this decline. What are the possible root causes of these fluctuations and how can we make improvements to address them? Has or will the Division provide support and assistance by completing analytics that could help shed light on this data? Is it possible to control for certain variables (e.g. worker case load size at the time of review, years of experience, training level) as these reviews are conducted to better understand why the state is declining and why the OSRI counties appear to have lower scores than the other 90 counties? How do variations in interpretation of the tool affect these ratings? Are there specific lessons that can be shared from failures and successes?
- Multiple counties have expressed concerns regarding the reliability of the data. Although the workforce in many counties is stretched as the result of rising caseload numbers and additional responsibilities (e.g. NCFAS, new policy requirements, and increased case complexity) some of the drops in performance are so large that it is unrealistic to think that over the periods reviewed that these impacts on practice could have been so large. Has any review of scoring taken place at the division to examine these individual discrepancies?
- We understand that the benchmark from the Children's Bureau is high and challenging to meet, however, could this context be included (with the possible inclusion of additional comparisons to other states) so that the document is reflective of the full picture, particularly when it is reviewed by a person who may be unfamiliar with child welfare and the context of these high federal requirements?
- We have heard that some counties are using a practice model. Is this a solution that the Children's Bureau would be in support of that might provide helpful structure to the work being done and improve OSRI performance? Have any cases been reviewed from counties using a performance model to evaluate performance in comparison to a county that is only using the Division policies and procedures?
- We are concerned that the specific recommendations provided (e.g. repeating training annually, watching webinars) will not equal the improvements that the Division is expecting from counties. We have heard from counties that they would like more detailed training and we know that training capacity at the Division level is stretched.

In summary, we are very concerned about the information in this report and that these scores are likely indicative of a larger problem or root cause. It is more than inadequate documentation or staff turnover. Counties are committed to high quality work and are seeking guidance on specific recommendations and solutions that are directly connected to improved OSRI reviews and practice. We

also hope that some context could be provided in the body of the document to raise some of these questions to provide a more complete picture of the current state of our OSRI performance.