

EXECUTIVE SUMMARY

Final Report: Iowa Child and Family Services Review

This document presents the findings of the Child and Family Services Review (CFSR) for the State of Iowa. The CFSR assesses State performance with regard to seven outcomes for children in the areas of safety, permanency, and well-being and seven systemic factors pertaining to the State's capacity to achieve positive outcomes for children and families. The CFSR was conducted the week of May 19, 2003. The findings were derived from the following documents and data collection procedures:

- The Statewide Assessment, prepared by the State child welfare agency – the Iowa Department of Human Services (DHS), Division of Behavioral, Developmental, and Protective Services for Adults, Children and Families.
- The State Data Profile, prepared by the Children's Bureau of the U.S. Department of Health and Human Services, which provides State child welfare data for the years 1999 through 2001;
- Reviews of 50 cases at three sites in the State (Linn County [Cedar Rapids], Polk County [Des Moines], and Woodbury County [Sioux City]; and
- Interviews or focus groups (conducted at all three sites and at the State-level) with stakeholders including, but not limited to children, parents, foster parents, all levels of child welfare agency personnel, collaborating agency personnel, service providers, court personnel, and attorneys.

A key finding of the Iowa CFSR was that Iowa is in substantial conformity with two of the seven outcomes and three of the seven systemic factors. With regard to the outcomes, Iowa achieved substantial conformity with Safety Outcome 2 (Children are safely maintained in their homes whenever possible and appropriate) and Well Being Outcome 2 (Children receive appropriate services to meet their educational needs). The CFSR determined that DHS is effective in addressing the risk of harm to children either through placement in foster care or through providing adequate services to maintain children safely in their own homes. The CFSR also determined that DHS makes concerted efforts to address the educational needs of children in the child welfare agency caseloads.

One of the weakest areas of State performance on the outcomes occurred for Permanency Outcome 1 (Children have permanency and stability in their living situations). The CFSR found that DHS is not consistently effective with regard to (1) preventing foster care re-entries; (2) ensuring that children experience placement stability while they are in foster care; (3) establishing appropriate permanency goals in a timely manner; (4) achieving finalized adoptions in a timely manner; or (5) ensuring that older children in long-term foster care received appropriate services to assist them in making the transition from foster care to independent living. Despite these concerns, the CFSR found that DHS is consistently effective in reunifying children with their families in a timely manner.

Stakeholders interviewed during the onsite CFSR noted that the courts, in general, make concerted efforts to adhere to the timelines for permanency established by both the Adoption and Safe Families Act and by State statute, and for the most part meet all requirements.

However, some stakeholders also noted that the quality of case reviews and hearings is not always sufficient to effectively move the child toward permanency. In addition, stakeholders also noted that there is reluctance on the part of some judges to terminate parental rights for a child if the child is not in an adoptive placement, which often results in delays in achieving finalized adoptions.

Another area of concern with regard to the State's CFSR performance pertained to Well-Being Outcome 1 (Families have enhanced capacity to provide for their children's needs). Only 24 percent of the 50 cases reviewed were determined to have substantially achieved this outcome. Although all of the indicators for this outcome were determined to be areas in need of improvement, the frequency of caseworker contacts with the children in their caseloads was identified as the most significant problem area within this outcome. Case reviewers determined that caseworker contact with children was of sufficient frequency and quality in only 10 percent of the 50 applicable cases. The lack of contact was attributed to the excessively high caseloads carried by caseworkers in the State, and the consequent reliance on information from other sources, such as service providers, to monitor children's safety and well-being.

With regard to the systemic factors, the State was determined to be in substantial conformity with the factors of Statewide Information System; Agency Responsiveness to the Community; and Foster and Adoptive Parent Licensing, Recruitment, and Retention. The State did not achieve substantial conformity with the systemic factors of Case Review System, Training, Service Array, and Quality Assurance System. Information from the Statewide Assessment and the stakeholder interviews conducted during the onsite CFSR attributes many of the current difficulties experienced by DHS to recent budget cuts in all areas of child welfare agency functioning. In recent years, funds available for services, training, quality assurance, and even maintenance of the management information system have been substantially reduced and there is an anticipation of further budget cuts in the future.

The CFSR findings with regard to the State's efforts to address the needs of Native American children and the child welfare agency's relationship with the Tribes were mixed. Although some stakeholders, particularly in Woodbury County, expressed the opinion that the requirements of the Indian Child Welfare Act (ICWA) are not routinely adhered to by the courts and the agency, other stakeholders reported that DHS is in the process of working collaboratively with Tribes within the State and has made extensive progress in improving agency adherence to ICWA requirements.

The overall findings with regard to the State's performance on the safety and permanency outcomes are presented in table 1 at the end of the Executive Summary. Findings regarding well-being outcomes are presented in table 2. Table 3 presents the State's performance relative to the national standards and table 4 provides information pertaining to the State's substantial conformity with the seven systemic factors assessed through the CFSR.

I. KEY FINDINGS RELATED TO OUTCOMES

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

Safety Outcome 1 incorporates two indicators. One pertains to the timeliness of initiating a response to a child maltreatment report (item 1) and the other relates to the recurrence of substantiated or indicated maltreatment for the same children (item 2).

Iowa did not achieve substantial conformity with Safety Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 82.9 percent of the cases reviewed, which is less than the 90 percent required for a rating of substantial conformity.
- The State did not meet the national standards for (1) the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period, and (2) the percentage of children maltreated while in foster care.

A key finding of the CFSR case reviews was that, although caseworkers established face-to-face contact with children and families in accordance with State-established timeframes when the maltreatment reports involved immediate threat or high-risk, they were less consistent in meeting these timeframes when the maltreatment reports were not classified as high risk.

In addition, although case reviews did not identify extensive repeat maltreatment as it is measured for the CFSR (item 2), the maltreatment recurrence rate (11.2%) reported in the State Data Profile indicates that in 2001, Iowa did not meet the national standard for this measure of 6.1 percent or less. The State Data Profile also indicates that Iowa's incidence of maltreatment in foster care in 2001 (.89%) did not meet the national standard of .57 percent or less. Stakeholders commenting on the issue of maltreatment in foster care suggested that this problem may be attributed to situations in which there are too many children in one foster home or in which there has not been an appropriate match between the children's needs and the foster family's ability to meet those needs.

Safety Outcome 2: Children are safely maintained in their homes when possible and appropriate

Performance on Safety Outcome 2 is assessed through two indicators. One indicator (item 3) addresses the issue of child welfare agency efforts to prevent children's removal from their homes by providing services to the families that ensure children's safety while they remain in their homes. The other indicator (item 4) pertains to the child welfare agency's effectiveness in reducing risk of harm to children.

Iowa achieved substantial conformity with Safety Outcome 2. This determination was based on the finding that the outcome was substantially achieved in 93.5 percent of the cases reviewed, which meets the 90 percent required for a rating of substantial conformity.

For the most part, case reviewers determined that DHS was effective in: (1) providing appropriate services to families to protect children in the home and prevent their removal, and (2) appropriately removing children from their homes when the potential risk of harm was high. Some stakeholders, however, expressed concern that in some cases the agency's assessment of risk is not sufficiently comprehensive to capture underlying problems in the family, particularly mental health issues.

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

There are six indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain to the child welfare agency's effectiveness in preventing foster care re-entry (item 5), ensuring placement stability for children in foster care (item 6), and establishing appropriate permanency goals for children in foster care in a timely manner (item 7). Depending on the child's permanency goal, the remaining indicators focus on the child welfare agency's success in achieving permanency goals (such as reunification, guardianship, adoption, and permanent placement with relatives) in a timely manner (items 8 and 9), or whether children who have "other planned living arrangements" as a case goal are in stable placements and adequately prepared for eventual independent living (item 10).

Iowa did not achieve substantial conformity with Permanency Outcome 1. This determination was based on the following findings:

- The outcome was substantially achieved in 50.0 percent of the cases, which is less than the 90 percent required for an overall rating of substantial conformity.
- The State Data Profile indicates that for fiscal year (FY) 2001, the State did not meet the national standard for the rate of foster care re-entries.

However, the FY 2001 data reported in the State Data Profile indicate that Iowa met the national standards for (1) the percentage of children who were reunified within 12 months of entry into foster care, (2) the percentage of children who were discharged to finalized adoptions within 24 months of entry into foster care, and (3) the percentage of children who experienced no more than 2 placements after having been in foster care for 12 months or less.

A key case review finding was that five of the six indicators for Permanency Outcome 1 were rated as an Area Needing Improvement. In addition, performance on this outcome varied across the sites included in the onsite CFSR. Case reviewers determined that the outcome was substantially achieved in 75 percent of Woodbury County cases, compared to only 42 percent of Linn County cases and 41 percent of Polk County cases.

With regard to Permanency Outcome 1, the key concerns identified through the case reviews pertained to the agency's inconsistent effectiveness with regard to (1) preventing children's re-entry into foster care, and (2) achieving finalized adoptions in a timely

manner. At least 40 percent of the applicable cases were rated as an Area Needing Improvement for both of these indicators. Despite these concerns, case reviewers also found that DHS was effective in reunifying children in a timely manner.

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

Permanency Outcome 2 incorporates six indicators that assess the child welfare agency's performance with regard to (1) placing children in foster care in close proximity to their parents and close relatives (item 11); (2) placing siblings together (item 12); (3) ensuring frequent visitation between children and their parents and siblings in foster care (item 13); (4) preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); (5) seeking relatives as potential placement resources (item 15); and (6) promoting the relationship between children and their parents while the children are in foster care (item 16).

Iowa did not achieve substantial conformity with Permanency Outcome 2. This determination was based on the finding that the outcome was rated as substantially achieved in 82.1 percent of the cases, which is less than the 90 percent required for substantial conformity.

Key CFSR findings were that DHS makes concerted efforts to (1) place children in close proximity to their families, (2) place siblings together in foster care, and (3) promote frequent visitation between children and their parents and siblings in foster care. Areas of concern with respect to this outcome pertained to a lack of consistent effort on the part of DHS to (1) seek and assess relatives as placement resources, (2) preserve children's connections to their families and racial and religious heritage, and (3) support or promote the parent-child relationship.

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

Well Being Outcome 1 incorporates four indicators. One pertains to the child welfare agency's efforts to ensure that the service needs of children, parents, and foster parents are assessed and that the necessary services are provided to meet identified needs (item 17). A second indicator assesses the child welfare agency's effectiveness with regard to actively involving parents and children (when appropriate) in the case planning process (item 18). The two remaining indicators examine the frequency and quality of caseworker's contacts with the children in their caseloads (item 19) and the children's parents (item 20).

Iowa did not achieve substantial conformity with Well-Being Outcome 1. This determination was based on the finding that the outcome was rated as substantially achieved for 24.0 percent of the cases reviewed, which is less than the 90 percent required for a

determination of substantial conformity.

A key finding relevant to this outcome was that case reviewers determined that in a large percentage of cases, the frequency of face-to-face contact between DHS caseworkers and the children and parents in their caseloads was determined to be insufficient to meet the needs of children or to effectively promote attainment of case goals. Case reviewers found that the lack of adequate contact between caseworkers and children resulted in caseworkers being unaware of important information and/or events in the children's lives. For example, in one case a caseworker was not aware that an adolescent in foster care had graduated from high school and thought that he was a junior in high school. In another case, the caseworker thought that the child had supervised visits with his sibling, but he did not. In another case, the caseworker did not know that the child had frequent visits with her biological mother although the mother's parental rights had been terminated.

Information in the Statewide Assessment indicates that the State expected that the onsite CFSR would identify caseworker contacts with children and parents as areas needing improvement. According to the Statewide Assessment, severe budget cuts have significantly reduced the number of agency staff, which has resulted in very high caseloads that adversely impact the ability of caseworkers to establish face-to-face contact with parents and children.

Case reviewers also determined that DHS was not consistently effective in assessing and meeting the service needs of children, parents, and foster parents or in involving children and parents in the case planning process. Stakeholders reported that the agency's use of some form of family group decision making in the case-planning process resulted in greater involvement of parents and children in the case planning process, but that caseworkers were not using this format on a consistent basis, primarily because of their excessively high caseloads.

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

There is only one indicator for Well-Being Outcome 2 and it pertains to the child welfare agency's effectiveness in addressing and meeting the educational needs of children in both foster care and in-home services cases (item 21).

Iowa achieved substantial conformity with Well-Being Outcome 2. The outcome was determined to be substantially achieved in 92.7 percent of the applicable cases, which exceeds the 90 percent required for substantial conformity.

The CFSR found that DHS made concerted efforts to effectively assess children's educational needs and provide appropriate services to meet those needs. Stakeholders in all counties reported that there is a positive and productive collaboration between DHS and the schools, which allows the agency to be effective in meeting children's educational needs.

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

This outcome incorporates two indicators that assess the child welfare agency's efforts to meet children's physical health (item 22) and mental health (item 23) needs.

Iowa did not achieve substantial conformity with Well-Being Outcome 3. This determination was based on the finding that the outcome was rated as substantially achieved in 78.7 percent of the 47 applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

Although the individual items pertaining to this outcome were rated as a Strength for the State, there were an insufficient number of cases in which both items were rated as a Strength. That is, in some cases, the agency was effective in addressing children's physical health issues, but not their mental health service needs, and in some cases, the opposite was true.

II. KEY FINDINGS RELATED TO SYSTEMIC FACTORS

Statewide Information System

Substantial conformity with the systemic factor of Statewide Information System is determined by whether the State is operating a statewide information system that can identify the status, demographic characteristics, location, and goals for children in foster care.

Iowa was determined to be in substantial conformity with this systemic factor because the State's Statewide Information System can identify the required information for all children in foster care.

Case Review System

Five indicators are used to assess the State's performance with regard to the systemic factor of a Case Review System. The indicators examine the development of case plans and parent involvement in that process (item 25), the consistency of 6-month case reviews (item 26) and 12-month permanency hearings (item 27), the implementation of procedures to seek termination of parental rights (TPR) in accordance with the timeframes established in the Adoption and Safe Families Act (ASFA) (item 28), and the notification and inclusion of foster and pre-adoptive parents and relative caregivers in case reviews and hearings (item 29).

Iowa is not in substantial conformity with the factor of Case Review system. Although the State implements 6-month reviews and 12-month permanency hearings on a timely basis, and has a procedures in place for seeking termination of parental rights (TPR) in accordance with the provisions of the Adoption and Safe Families Act (ASFA), the CFSR determined that case plans are not consistently developed jointly with the child's parents. In addition, the CFSR found that key stakeholders in the agency, courts, and community do not seem to have a clear and uniform understanding of who is responsible for notifying foster parents of reviews or court hearings, although the Statewide Assessment indicates that there is a written protocol for this process.

Quality Assurance System

Performance with regard to the systemic factor of Quality Assurance System is based on whether the State has developed standards to ensure the safety and health of children in foster care (item 30), and whether the State is operating a statewide quality assurance system that evaluates the quality and effectiveness of services and measures program strengths and areas needing improvement (item 31).

Iowa is not in substantial conformity with the systemic factor of Quality Assurance System. Although the State has implemented standards to ensure the safety and health of children in foster care, DHS does not have a quality assurance system that operates Statewide.

Training

The systemic factor of Training incorporates an assessment of the State's new caseworker training program (item 32), ongoing training for child welfare agency staff (item 33), and training for foster and adoptive parents (item 34).

Iowa is not in substantial conformity with the systemic factor of Training. Although the CFSR determined that the State has a well-conceptualized and broad pre-service training curriculum for caseworkers, the training system is not functioning as it should. Specifically, the ability of caseworkers to participate in training in a timely manner has been compromised due to reductions in the frequency of offering the training and the high caseloads that caseworkers carry. Furthermore, in the absence of a functioning quality assurance system, the agency is reliant on front-line supervisors to ensure quality casework, but no training is provided to assist them in this task. In addition, the CFSR found that opportunities for ongoing training are not readily available because of the 75 percent reduction in the agency's budget allocated for training. Despite these concerns, the CFSR found that pre-service and ongoing training for foster and adoptive parents are perceived as being of high quality and readily accessible.

Service Array

The assessment of the systemic factor of Service Array addresses three questions: (1) Does the State have in place an array of services to meet the needs of children and families served by the child welfare agency (item 35)? (2) Are these services accessible to families and children throughout the State (item 36)? And (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency (item 37)?

Iowa is not in substantial conformity with the systemic factor of Service Array. The CFSR found that recent and severe budget cuts have resulted in significant reductions in the service array, leading to a number of critical services either being eliminated or sharply reduced. Consequently, even when services are available, there are long waiting lists. In addition, services are not available in all areas of the State, particularly in rural areas. The CFSR determined that a lack of foster family or residential treatment services in some areas of the State often results in children being placed away from their home communities. Finally, the CFSR found that services are not routinely meeting the diverse needs of the children and families, primarily because the flexibility in designing services to meet individual needs has been significantly reduced due to budget cuts.

Agency Responsiveness to the Community

Performance with regard to the systemic factor of Agency Responsiveness to the Community incorporates an assessment of the State's consultation with external stakeholders in developing the Child and Family Services Plan (items 38 and 39), and the extent to which the State coordinates child welfare services with services or benefits of other Federal or federally-assisted programs serving the same population.

Iowa is in substantial conformity with the systemic factor of Agency Responsive to the Community. The CFSR found that the State child welfare agency engages many partners in the development and implementation of the goals and objectives of the CFSP and maximizes opportunities to coordinate with Federal and federally assisted service programs. However, the CFSR also determined that there is a need for DHS to be more inclusive of Tribes in planning its goal and activities.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

The assessment of this systemic factor focuses on the State's standards for foster homes and child care institutions (items 41 and 42), the State's compliance with Federal requirements for criminal background checks for foster and adoptive parents (item 43), the States efforts to recruit foster and adoptive parents that reflect the ethnic and racial diversity of foster children (item 44), and the State's activities with regard to using cross-jurisdictional resources to facilitate permanent placements for waiting children.

Iowa is in substantial conformity with this systemic factor. The CFSR found that standards for foster homes and care facilities have been established and are applied consistently, and background clearances are routinely conducted for all foster families. In addition, the State has a functioning process for obtaining cross-jurisdictional resources for waiting children.

Despite these strengths, the CFSR determined that, although the State has a Statewide recruitment contract in place, there is a strong need to focus concentrated efforts on foster and adoptive homes that reflect the ethnic and racial diversity of the children entering foster care, particularly Native American children.

Table 1. Iowa CFSR Ratings for Safety and Permanency Outcomes and Items

Outcomes and Indicators	Outcome Ratings			Item Ratings		
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards?</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Safety Outcome 1-Children are first and foremost, protected from abuse and neglect	No	82.9	No			
Item 1: Timeliness of investigations				ANI	73	
Item 2: Repeat maltreatment				ANI	92	No
Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate	Yes	93.5				
Item 3: Services to prevent removal				Strength	100	
Item 4: Risk of harm				Strength	93	
Permanency Outcome 1- Children have permanency and stability in their living situations	No	50.0	3 met, 1 not met			
Item 5: Foster care re-entry				ANI	60	No
Item 6: Stability of foster care placements				ANI	82	Yes
Item 7: Permanency goal for child				ANI	75	
Item 8: Reunification, guardianship and placement with relatives				Strength	92	Yes
Item 9: Adoption				ANI	55	Yes
Item 10: Other planned living arrangement				ANI	80	
Permanency Outcome 2 - The continuity of family relationships and connections is preserved	No	82.1				
Item 11: Proximity of placement				Strength	95	
Item 12: Placement with siblings				Strength	88	
Item 13: Visiting with parents and siblings in foster care				Strength	85	
Item 14: Preserving connections				ANI	79	
Item 15: Relative placement				ANI	77	
Item 16: Relationship of child in care with parents				ANI	79	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI)

Table 2. Iowa CFSR Ratings for Child and Family Well Being Outcomes and Items

Outcomes and Indicators	Outcome Ratings		Item Ratings			
	<i>In Substantial Conformity?</i>	<i>Percent Substantially Achieved*</i>	<i>Met National Standards</i>	<i>Rating**</i>	<i>Percent Strength</i>	<i>Met National Standards</i>
Well Being Outcome 1 - Families have enhanced capacity to provide for children's needs	No	24.0				
Item 17: Needs/services of child, parents, and foster parents				ANI	72	
Item 18: Child/family involvement in case planning				ANI	66	
Item 19: Caseworker visits with child				ANI	10	
Item 20: Caseworker visits with parents				ANI	23	
Well Being Outcome 2 - Children receive services to meet their educational needs	Yes	92.7				
Item 21: Educational needs of child				Strength	93	
Well Being Outcome 3 - Children receive services to meet their physical and mental health needs are met	No***	78.7				
Item 22: Physical health of child				Strength	89	
Item 23: Mental health of child				Strength	86	

*90 percent of the applicable cases reviewed must be rated as having substantially achieved the outcome for the State to be in substantial conformity with the outcome.

**Items may be rated as a Strength or an Area Needing Improvement (ANI)

***Although the individual items pertaining to this outcome were rated as a Strength, there were many cases in which only one of the items was rated as a Strength. That is in some cases the agency was effective in addressing a child's physical health needs but not their mental health needs, and in some cases, the opposite was true.

Table 3: Iowa's Performance on the Six Outcome Measures for Which National Standards have been Established

Outcome Measure	National Standard	Iowa Data
Of all children who were victims of a substantiated or indicated maltreatment report in the first 6 months of CY 2001, what percent were victims of another substantiated or indicated report within a 6-month period?	6.1% or less	11.2%
Of all children who were in foster care in the first 9 months of CY 2001, what percent experienced maltreatment from foster parents or facility staff members?	.57% or less	.89%
Of all children who entered foster care in FY 2001, what percent was re-entering care within 12 months of a prior foster care episode?	8.6% or less	25.0%
Of all children reunified from foster care in FY 2001, what percent were reunified within 12 months of entry into foster care?	76.2% or more	81.0%
Of all children who were adopted from foster care in FY 2001, what percent were adopted within 24 months of their entry into foster care?	32.0% or more	49.0%
Of all children in foster care during FY 2001 for less than 12 months, what percent experienced no more than 2 placement settings?	86.7% or more	88.0%

Table 4: Iowa CFSR Ratings for the Seven Systemic Factors

Systemic Factors	In Substantial Conformity?*	Rating
IV. Statewide Information System	Yes (3)	
Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care		Strength
V. Case Review System	No (2)	
Item 25: Process for developing a case plan and for joint case planning with parents		ANI
Item 26: Process for 6-month case reviews		Strength
Item 27: Process for 12-month permanency hearings		Strength
Item 28: Process for seeking TPR in accordance with ASFA		Strength
Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard		ANI
VI. Quality Assurance System	No (2)	
Item 30: Standards to ensure quality services and ensure children’s safety and health		Strength
Item 31: Identifiable QA system that evaluates the quality of services and improvements		ANI
VII. Training	No (2)	
Item 32: Provision of initial staff training		ANI
Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge.		ANI
Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge		Strength
VIII. Service Array	No (1)	
Item 35: Availability of array of critical services		ANI
Item 36: Accessibility of services across all jurisdictions		ANI
Item 37: Ability to individualize services to meet unique needs		ANI
IX. Agency Responsiveness to the Community	Yes (4)	
Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP		Strength
Item 39: Develops annual progress reports in consultation with stakeholders		Strength
Item 40: Coordinates services with other Federal programs		Strength
X. Foster and Adoptive Parent Licensing, Recruitment and Retention	Yes (4)	
Item 41: Standards for foster family and child care institutions		Strength
Item 42: Standards are applied equally to all foster family and child care institutions		Strength
Item 43: Conducts necessary criminal background checks		Strength
Item 44: Diligent recruitment of foster and adoptive families that reflect children’s racial and ethnic diversity		ANI
Item 45: Uses cross-jurisdictional resources to find placements		Strength

*Systemic factors are rated on a scale from 1 to 4. A rating of 1 or 2 indicates “Not in Substantial Conformity.” A rating of 3 or 4 indicates Substantial Conformity.

** Individual items may be rated either as a Strength or as an Area Needing Improvement (ANI)

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