

EXECUTIVE SUMMARY

Final Report: Utah Child and Family Services Review

The Child and Family Services Review (CFSR) assesses State performance during a specified time period on seven child welfare outcomes pertaining to safety, permanency, and well-being and on seven systemic factors. Utah CFSR was conducted the week of April 28, 2003. The assessment is based on information from the following sources:

- The Statewide Assessment, prepared by the State child welfare agency – the Utah Division of Child and Family Services (DCFS);
- 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 throughout the State – Salt Lake County, Utah County, and Grand and San Juan (Grand/San Juan) Counties; 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.

One key finding was that the CFSR found that Utah is highly successful in achieving adoptions for children in a timely manner. The fiscal year 2001 data presented in the State Data Profile indicate that Utah’s percentage of children experiencing a finalized adoption within 24 months of entry into foster care (70.8%) far exceeds the national standard of 32 percent. In addition, case reviewers determined that DCFS had made concerted efforts to achieve a finalized adoption in a timely manner in 8 of the 9 applicable cases. Stakeholders commenting on this issue noted that a key facilitating factor with respect to expedited adoptions is the placement of children in foster homes that are already licensed as adoptive homes and the ability to count the time in these foster homes toward the State’s statutory requirement that children have to be in an adoptive placement for 6 months prior to finalization. This means that many adoptions can be finalized immediately after termination of parental rights.

Another finding in the Utah CFSR was that only 57 percent of the cases reviewed were determined to have substantially achieved permanency outcome 1 – Children have permanency and stability in their living situations. The primary areas of concern pertained to the rate of foster care re-entry (item 5), the instability of foster care placements for many children (item 6), and the establishment of inappropriate goals for many of the children in the foster care cases (item 7). However, it is important to note that there was considerable variation across the sites included in the onsite CFSR with respect to performance on this outcome. In Grand/San Juan Counties, for example, 91 percent of the foster care cases reviewed were determined to have substantially achieved this outcome, compared to 60 percent of the foster care cases reviewed in Salt Lake County, and only 11 percent of the foster care cases reviewed in Utah County.

The State was found to be in substantial conformity with safety outcome 2 – Children are safely maintained in their homes whenever possible and appropriate. In all counties included in the onsite CFSR, case reviewers determined that DCFS made concerted efforts to prevent the placement of children in foster care whenever possible and to reduce the risk of harm to children.

One concern that emerged during the CFSR pertained to the relationship between DCFS and the Ute Tribe, which is one of the major Tribes located in Utah. At present, there is no written agreement between the Tribe and the State pertaining to child welfare issues and this appears to result in some confusion and inconsistency in responding to child maltreatment and other child welfare related concerns. Several stakeholders suggested that a written agreement, similar to the one that exists between the State and the Navaho Tribe, would result in improvements in ensuring the safety, permanency, and well-being of Ute children.

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, and 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).

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

- The outcome was substantially achieved in 81.4 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 standard for the percentage of children experiencing more than one substantiated or indicated child maltreatment report within a 6-month period.

However, the State did meet the national standard for the percentage of children maltreated while in foster care.

There were considerable differences in performance on Safety Outcome 1 among the sites included in the onsite CFSR review. In Utah County, for example, only 61 percent of the cases were determined to have substantially achieved this outcome compared to 90 percent in Salt Lake County and 89 percent in Grand/San Juan Counties.

The case reviews revealed inconsistent practices with respect to the timeliness of initiating a response to child maltreatment reports and establishing face-to-face contact with children and families. Although in many cases workers did respond in a timely manner, in 25 percent of the applicable cases (20), face-to-face contact with the alleged child victim was not established in accordance with the State's required time frames. Responses that did not meet State requirements, however, occurred only when maltreatment reports were classified as low or moderate risk, and not when reports were determined to be high risk. Stakeholders interviewed during the onsite CFSR indicated that delays in responding were due in part to the large caseloads carried by DCFS caseworkers.

Although case reviews did not identify extensive maltreatment recurrence as measured by the indicator in the CFSR (item 2), the State's incidence of maltreatment recurrence in fiscal year (FY) 2001 (7.4%) did not meet the national standard for this measure of 6.1 percent or less.

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

Performance relevant to safety outcome 2 is assessed through 2 indicators. One indicator (item 3) addresses the issue of the DCFS' 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 DCFS' effectiveness in reducing the risk of harm to the child.

Utah achieved substantial conformity with Safety Outcome 2. This determination was based on the finding that this outcome was substantially achieved in 90.4 percent of the cases reviewed, which meets the 90 percent required for a rating of substantial conformity.

In most of the cases reviewed for the CFSR, reviewers determined that the agency made diligent efforts to prevent the placement of children in foster care whenever possible by providing services to families while children remained in their home or in voluntary placements with relatives. When the risk of harm to children was considered too high to warrant in-home services, the agency risk of harm was usually addressed by removing children from their homes and either providing services to the family to bring about a reunification or seeking termination of parental rights (TPR) to achieve alternative permanency goals.

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

There are 10 indicators incorporated in the assessment of permanency outcome 1, although not all of them are relevant for all children. The indicators pertain DCFS' 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 DCFS' success in achieving permanency goals (such as reunification, guardianship, adoption, permanent placement with relatives) in a timely manner (items 8 and 9), or whether children who have other planned living arrangements are in stable placements and adequately prepared for eventual independent living (item 10).

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

- The outcome was substantially achieved in 57.1 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 Federal fiscal year (FFY) 2001, the State did not meet the national standards for (1) the rate of foster care re-entries and (2) the percentage of children in foster care for 12 months or less who experienced no more than 2 placements.

The State did meet the national standard for the percentage of children in FFY 2001 who were (1) reunified within 12 months of entry into foster care and (2) discharged to finalized adoptions within 24 months of entry into foster care.

Performance with respect to permanency outcome 1 varied considerably across the three sites included in the onsite CFSR. In Grand/San Juan Counties, 91 percent of the applicable cases reviewed were determined to have substantially achieved this outcome, compared to 60 percent of the applicable cases in Salt Lake County, and as few as 11 percent of the applicable cases in Utah County. The primary difference among counties occurred for the indicator pertaining to the establishment of appropriate permanency goals in a timely manner (item 7). In Utah County, 67 percent of the applicable cases were rated as an Area Needing Improvement for this indicator, compared to only 9 percent of the applicable cases in Grand/San Juan Counties and 33 percent of the applicable cases in Salt Lake County.

In general, case reviews revealed inconsistencies with regard to DCFS' efforts to achieve permanency and stability for children in foster care. Although there were many cases in which the children experienced permanency and stability in their living situations, there also were cases in which children re-entered foster care within 12 months of a prior foster care episode (item 5), experienced multiple placements during the period under review (item 6), and either had inappropriate permanency goals (item 10) or were not reunified with parents or relatives in a timely manner (items 7 and 8).

Despite these areas of concern, almost all children with a goal of adoption were found to have achieved or be likely to achieve a finalized adoption in a timely manner (item 9). This is consistent with the Statewide data for FY 2001 indicating that the State's percentage of children exiting foster care to adoption within 24 months of entry into foster care (70.8%) far exceeded the national standard of 32.0 percent or more. Stakeholders commenting on this issue noted that a key facilitating factor with respect to expedited adoptions is the placement of children in foster homes that are already licensed as adoptive homes and the ability to count the time in these foster homes toward the State's statutory requirement that children have to be in an adoptive placement for 6 months prior to finalization. This means that many adoptions can be finalized immediately after termination of parental rights.

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

The assessment of permanency outcome 2 incorporates six indicators that assess DCFS' performance with regard to placing children in foster care in close proximity to their parents and close relatives (item 11); placing siblings together (item 12); ensuring frequent visitation between children and their parents and siblings in foster care (item 13); preserving connections of children in foster care with extended family, community, cultural heritage, religion, and schools (item 14); seeking relatives as potential placement resources (item 15); and promoting the relationship between children and their parents while the children are in foster care.

Utah 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 77.1 percent of the cases, which is less than the 90 percent required for substantial conformity.

Similar to permanency outcome 1, there was considerable variation among counties in performance on permanency outcome 1. Fifty-five percent of the cases in Utah County were determined to have substantially achieved this outcome, compared to 87 percent of the cases in Salt Lake County and 82 percent in Grand/San Juan County. For the most part, cases in Utah County were less likely than cases in the other two counties to be rated as a Strength for the indicators pertaining to preserving connections and seeking relatives as potential placement resources.

In general, the CFSR findings indicate that the Utah DCFS makes concerted efforts to place children in close proximity to their families, to promote and maintain parent-child relationships, and to ensure frequent visitation between children and their parents and siblings in foster care. Reviewers determined that DCFS was less consistent in its efforts to seek and assess relatives as placement resources and to preserve children's connections to their families and racial and religious heritage.

A key concern identified with respect to this item pertained to the finding that Native American children's connection with their culture is not being consistently maintained. Stakeholders reported that if Native American children are placed with the child welfare agency, they are generally in non-Native homes because there are not enough Native American foster homes. This often results in a lack of connection for these children to their tribe, their culture, and their customs because the agency usually leaves it up to the foster parents to decide whether they will try to keep the child connected rather than making it a requirement and having a formal process in place.

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 DCFS' 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 DCFS' 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 DCFS caseworker contact with the children in their caseloads (item 19) and the children's parents (item 20).

Utah 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 66.0 percent of the cases reviewed, which is less than the 90 percent required for a determination of substantial conformity.

Case reviewers determined that DCFS was not consistent in assessing and addressing the service needs of children and their parents, involving parents and children in the case planning process, or establishing sufficient face-to-face contact with children and parents. In general, however, DCFS was found to be more effective in achieving these objectives when the children were in foster care than when the children remained in their homes or in the home of a relative. One key concern identified pertained to inadequate assessments of all family members. Another area of concern pertained to a lack of consistent effort to address father's needs, involve fathers in case planning, and establish contact with fathers.

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

There is only one indicator for well being outcome 2, and that pertains to DCFS' effectiveness in addressing children's educational needs (item 21). Utah achieved substantial conformity with Well-Being Outcome 2 based on the finding that 100 percent of the cases reviewed were found to have substantially achieved this outcome, which meets the 90 percent required for substantial conformity.

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

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

Utah 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 81.6 percent of the applicable cases, which is less than the 90 percent required for a determination of substantial conformity.

Although Utah did not reach the 90 percent substantially achieved required for substantial conformity with this outcome, the CFSR case reviews identified many strengths in the agency's efforts to meet children's physical and mental health needs. For the most part, the agency has been highly successful in providing physical health and dental services to children and in assessing and meeting their mental health needs. A key concern identified with respect to mental health needs is that while children were receiving appropriate assessments, in some cases, services to address the needs identified through the assessments were not being provided. In addition, while stakeholders in the rural county were more likely than stakeholders in the urban county to identify meeting children's mental health needs as somewhat problematic, 100 percent of the cases in the Grand/San Juan Counties were rated as a Strength for this item compared to 79 percent of the cases in Utah county and 75 percent of the cases in Salt Lake County.

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. Utah did achieve substantial conformity with this systemic factor. Stakeholders interviewed during the onsite CFSR were in general

agreement that the State's information system meets and exceeds the requirements of the indicator. The Statewide Assessment reported that the system is in the process of being updated to conform to the agency's Practice Model.

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 (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 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.

Utah did not achieve substantial conformity with the systemic factor of case review system. Key concerns identified with regard to this factor pertained to the lack of involvement of parents in the case planning process and inconsistencies with respect to seeking TPR in accordance with ASFA timeframes. Stakeholders interviewed during the onsite CFSR expressed the opinion that although the new Practice Model approach is resulting in an increase in the involvement of parents in the case planning process, the use of this model is uneven across caseworkers. This perception is supported by the case review finding that parents were involved in the case planning process in only 72 percent of the applicable cases.

Despite these concerns, stakeholders were in agreement that all cases are reviewed at least every 6 months, and usually more frequently, and that 12-month permanency hearings are held in a timely manner. Stakeholders also noted that foster and pre-adoptive parents usually are notified of hearings and reviews, although their ability to provide input during court hearings varies across judges.

Quality Assurance System

The State's 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. Utah was found to have met both of these requirements and to be in full substantial conformity with this systemic factor.

Training

The systemic factor of training incorporates an assessment of the State's new worker training program, ongoing training efforts for child welfare agency staff, and training for foster and adoptive parents. All of these indicators were determined to be a Strength for the State and Utah was found to be in substantial conformity with this systemic factor. The training for foster and adoptive parents, which is provided by the Utah Foster Care Foundation, was identified by stakeholders as particularly noteworthy for its high quality and comprehensive approach.

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 that meet the needs of children and families served by the child welfare agency? (2) Are these services accessible to families and children throughout the State? And (3) Can services be individualized to meet the unique needs of the children and family served by the child welfare agency? Overall, the State was determined to be in substantial conformity with this systemic factor. However, although the CFSR determined that the State does have the necessary array of services in place and can individualize services to meet needs, the issue of the accessibility of services statewide was rated as an Area Needing Improvement. Stakeholders noted that children and families in many rural areas of the State do not have access to needed services and often have to travel long distances to receive services. During the CFSR, this was particularly noteworthy with respect to placement resources. In the most rural counties included in the onsite review (Grand/San Juan), there were insufficient placement resources to ensure that children in foster care are placed in close proximity to their families and close relatives.

Agency Responsiveness to the Community

Utah achieved substantial conformity with the systemic factor of Agency Responsiveness to the Community. The State's Child and Family Services Plan is developed in conjunction with many local representatives from other agencies. The agency has strong collaborations with external stakeholders on the State and local levels and is effective in ensuring the coordination of services with other agencies. However, it was noted that there appears to be a lack of representation of all appropriate stakeholders, particularly representatives of some of the federally recognized Tribes in the State.

Foster and Adoptive Parent Licensing, Recruitment, and Retention

Utah achieved substantial conformity with these systemic factors. It was determined that DCFS maintains and implements standards for foster family homes and the standards are applied to all licensed foster homes and facilities. It also was noted that the State completes criminal background checks prior to the approval of all foster and adoptive homes. The one concern noted with regard to this factor pertained to the recruitment of foster and adoptive parents that match the ethnic and racial diversity of children in foster care. Stakeholders noted that there are not enough Hispanic, Native American, or African American foster homes.

Table 1. 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 | 81.4 | No (1) | | | |
| Item 1: Timeliness of investigations | | | | ANI | 75 | |
| Item 2: Repeat maltreatment | | | | ANI | 91 | No |
| Safety Outcome 2 - Children are safely maintained in their homes when possible and appropriate | Yes | 90.4 | | | | |
| Item 3: Services to prevent removal | | | | Strength | 96 | |
| Item 4: Risk of harm | | | | Strength | 90 | |
| Permanency Outcome 1- Children have permanency and stability in their living situations | No | 57.1 | No (2) | | | |
| Item 5: Foster care re-entry | | | | ANI | 71 | No |
| Item 6: Stability of foster care placements | | | | ANI | 69 | No |
| Item 7: Permanency goal for child | | | | ANI | 66 | |
| Item 8: Reunification, guardianship and placement with relatives | | | | ANI | 72 | Yes |
| Item 9: Adoption | | | | Strength | 89 | Yes |
| Item 10: Other planned living arrangement | | | | ANI | 75 | |
| Permanency Outcome 2 - The continuity of family relationships and connections is preserved | No | 77.1 | | | | |
| Item 11: Proximity of placement | | | | Strength | 91 | |
| Item 12: Placement with siblings | | | | Strength | 86 | |
| Item 13: Visiting with parents and siblings in foster care | | | | Strength | 85 | |
| Item 14: Preserving connections | | | | ANI | 80 | |
| Item 15: Relative placement | | | | ANI | 80 | |
| Item 16: Relationship of child in care with parents | | | | Strength | 87 | |

*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. 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 | 66 | | | | |
| Item 17: Needs/services of child, parents, and foster parents | | | | ANI | 66 | |
| Item 18: Child/family involvement in case planning | | | | ANI | 73 | |
| Item 19: Worker visits with child | | | | ANI | 72 | |
| Item 20: Worker visits with parents | | | | ANI | 58 | |
| Well Being Outcome 2 - Children receive services to meet their educational needs | Yes | 100 | | | | |
| Item 21: Educational needs of child | | | | Strength | 100 | |
| Well Being Outcome 3 - Children receive services to meet their physical and mental health needs are met | No | 81.6 | | | | |
| Item 22: Physical health of child | | | | Strength | 94 | |
| Item 23: Mental health of child | | | | Strength | 85 | |

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

| Outcome Measure | National Standard | Utah 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 | 7.4% |
| 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 | .57% |
| Of all children who entered foster care in FY 2001, what percent were re-entering care within 12 months of a prior foster care episode? | 8.6% or less | 15.2% |
| 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 | 81.7% |
| 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 | 70.8% |
| 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 | 80.1% |

Table 4: CFSR Ratings for the Seven Systemic Factors

| Systemic Factors | In Substantial Conformity? | Ratings** |
|--|-----------------------------------|------------------|
| IV. Statewide Information System | Yes | |
| Item 24: System can identify the status, demographic characteristics, location and goals of children in foster care | | Strength |
| V. Case Review System | No | |
| 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 | | ANI |
| Item 29: Process for notifying caregivers of reviews and hearings and for opportunity for them to be heard | | Strength |
| VI. Quality Assurance System | Yes | |
| 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 | | Strength |
| VII. Training | Yes | |
| Item 32: Provision of initial staff training | | Strength |
| Item 33: Provision of ongoing staff training that addresses the necessary skills and knowledge. | | Strength |
| Item 34: Provision of training for caregivers and adoptive parents that addresses the necessary skills and knowledge | | Strength |
| VIII. Service Array | Yes | |
| Item 35: Availability of array of critical services | | Strength |
| Item 36: Accessibility of services across all jurisdictions | | ANI |
| Item 37: Ability to individualize services to meet unique needs | | Strength |
| IX. Agency Responsiveness to the Community | Yes | |
| Item 38: Engages in ongoing consultation with critical stakeholders in developing the CFSP | | ANI |
| 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 | |
| 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 |