

PUBLIC COMMENTS

Enhancing the Delivery of Services Steering Committee

01-08-202

The recommendations should state the issue or problem that is being addressed. Some of these recommendations are items that should be included as part of the normal conduct of any organization. Some of these recommendations are difficult to trace back or even trace to the focus groups or themes that were identified.

While there were eight stakeholder groups involved in the focus groups working with the steering committee it's not clear what representation these groups have, if at all, on the committee itself. The priorities of the recommendations presented in the report must be taken with a grain of salt as these are computed with an inherent bias of each committee members' perspective which may or may not be representative of those involved in the state's child welfare system.

Comments on specific recommendations are as follows

Recommendation A-Study, Review, Establish, and Publish CYFD Protocols to Ensure Child Health and Safety

- This recommendation is to continue to study the problem? Isn't this ongoing through a multitude of effort?. The expectation of this steering committee should be specific recommendations not to further study the problem. The number one recommendation shouldn't be to continue to study the problem. Provide distinct guidance and direction. There have been other groups that have done essentially the same thing. How is this different?

Recommendation B-Establish Internal and External Communication Protocols to Follow

- Some mention of transparency should be made in this recommendation.

Recommendation C-Create and Implement a Culture Change Strategy

- This should be the number one recommendation. Concepts like respect, integrity, ethics, transparency, willingness to do the right thing, willingness to put in the required effort should all be mentioned here.

- This theme is found in multiple focus groups.

- Culture change needs to begin with management and work its way down.

Recommendation D-Build and Sustain a Professional Workforce

- The wording of this recommendation should be changed as it implies the workforce is not professional. The recommendations are all things organizations do anyway to add staff. Nothing new here.
- This recommendation is redundant with Recommendation G. Keep G and remove D.

Recommendation E-Provide Workforce Supports

- This recommendation is good in that it lists specific actions that can be taken.

Recommendation F-Maximize Federal Title IV-E Funding

- I do not understand what problem this recommendation addresses. CYFD is well-funded having reverted millions of dollars the previous year. Agree with maximizing federal funding, but as a recommendation here this is unnecessary. It must be understood that federal money levies constraints and limitations that may not be desired or useful.
- From the focus groups and themes, it was recommended that other sources of funding should be investigated and obtained. Why only focus on Title IV-E funds?

Recommendation G-Develop a Workforce Retention Plan and Training Program

- See Recommendation D. This recommendation is redundant with D. This recommendation is the one that should be fleshed out more with specific items to develop, retain, and train the workforce
- CYFD employee training records have an entry for CYFD Code of Conduct training. The recommendation here should include actually implementing this training and have each member of the workforce complete it.

Recommendation H-Clarify Grievance Procedures and Rights of People Within the System

- This does not need clarification, it needs to be changed.
- Updating the various bill of rights may feel like progress is being made, but it is more important that these rights are actually promoted and not infringed upon.
- The foster parent grievance process needs to be changed. Retaliation and fear of retaliation are very real. The two levels of adjudicating grievances does not provide any reassurance that resolution will be impartial and not met with negative consequences.

- More discussion should occur regarding the Office of the Inspector General and Constituent Affairs for not only this area, but in the other recommendations as well

Recommendation I - Address Confidentiality Issues

- What are the confidentiality issues? Again, what problem is this recommendation supposed to address?
- One of the issues of confidentiality is that it is used to avoid working problems and finding solutions for them. Confidentiality is used as a roadblock to getting things done.
- Recommendation is to find where in the law confidentiality provisions need to be updated and changed.

Recommendation J-Support Foster Parent Associations

- The title of this recommendation does not match the supporting text. Not sure that this recommendation should even be on the list. Is this recommending that NFPA come to NM?
- Foster Parent Associations are not discussed in the focus groups or mentioned in the steering committee themes from focus groups.
- There are groups in NM that specifically support foster parents. CYFD should reach out and coordinate with these groups if it hasn't already.
- This recommendation would be more appropriate if it were to recommend a concerted effort to recruit and retain foster parents. There's data to be collected regarding foster parent churn and reasons why.
- A well-written and executed annual recruitment plan as specified in NMSA 8.26.2.10 should be completed. Recommend follow-up with the reviewing the latest plan the current and the status of its execution.

Recommendation K-Use Data to Identify Trends and Post Data Reports Frequently

- Recommendation should be to use the data to improve. For example, data would show repeat SCI calls and the need to elevate and provide focused attention.
- The discussion in Recommendation A about another category besides "substantiated" and "unsubstantiated" belongs here.

Recommendation L-Make It Easy to Find Information

- This recommendation should be about transparency and relates to Recommendation C. Providing information and being open helps in tis regard.

- Publishing IPRA responses contributes to being transparent and open. The comment about triggering duplicate requests doesn't make sense as the response to the original request would be available to all. Publishing requests is not a new or novel concept.

Recommendation M-Improve Utilization of Substitute Care Advisory Council

- It is not and should not be CYFD's responsibility to ensure that the SCAC is fully funded.
- This recommendation should be that CYFD responds to the SCAC's report in a timely fashion (within six months?) and address the items and concerns documented in the report. The current situation allows the SCAC to be ignored and made irrelevant.
- Additional recommendations should include updating NM Stat 32A-8-4 and NMAC 8.26.7
- Recommend SCAC be the review arm as it currently is and not make it a monitoring or oversight entity. Review and monitoring should be two separate and distinct functions.

Recommendation N-Continue an Advisory Entity

- Overall priority for this should be 12 and not 13 (M is 13)
- Before continuing an advisory entity, perhaps realist recommendations are actually defined, refined, and implemented.
- Option 1 of this recommendation is a self-licking ice cream cone

Recommendation O-Legislative Efforts

- This recommendation is listed as "CYFD should support an independent, objective monitoring entity" on page 5. Recommendation O should have a consistent title that is neither of these.
- This recommendation focused on independent, objective monitoring. Are there other legislative efforts that were discussed in the focus groups that were not included here?
- Survey question A asks "Do you think CYFD needs independent, objective monitoring?" and Survey question D asks "If you support an independent, objective monitoring effort, which option do you support?". Four options are provided to include #3: "CYFD should support legislation to create an autonomous internal ombudsman office housed at CYFD". An autonomous internal office housed at CYFD does not make sense as to how this is independent or objective.

Comments 12-03-2022

1.A Protocols to Ensure Child Health and Safety.

This section should include a protocol about how to use proactive connections with the First Response team (EMT's, paramedics, police and firefighters) to reduce mental health stigma during a crisis response and implement safety responses in a timely manner.

1.D Build and Sustain a Profession Workforce.

Role of Functions.

- Value the professional background and skills that each staff member can offer as a team.

1.G - Develop a workforce Retention Plan training program.

- It will be necessary to identify the staff professional growth, expectations for financial and career achievement.

- Implementing regular surveys that include levels of distress, promotions, culture of overwork, high-pressure jobs, skills performance and input from staff.